



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Tarchon Interconnector Project

Case Reference: EN0210009

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

13 May 2026

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	OVERARCHING COMMENTS	3
2.0	Description of the Proposed Development.....	3
2.1	EIA Methodology and Scope of Assessment	7
3.	ENVIRONMENTAL ASPECT COMMENTS – ONSHORE ENVIRONMENT	10
3.1	Ground Conditions and Contamination	10
3.2	Water Environment.....	12
3.3	Land Use, Soils and Agriculture	17
3.4	Onshore Biodiversity	19
3.5	Onshore Archaeology and Cultural Heritage	24
3.6	Traffic and Transport.....	28
4.	ENVIRONMENTAL ASPECT COMMENTS – OFFSHORE ENVIRONMENT	30
4.1	Marine Physical Environment.....	30
4.2	Benthic and Intertidal Ecology	33
4.3	Fish and Shellfish Ecology	37
4.4	Marine Mammal Ecology	41
4.5	Commercial Fisheries.....	45
4.6	Shipping and Navigation	48
4.7	Offshore Archaeology and Cultural Heritage	50
4.8	Offshore Infrastructure and Other Sea Users	51
5.	ENVIRONMENTAL ASPECT COMMENTS – UK SCHEME WIDE	53
5.1	Landscape and Visual Impact Assessment.....	53
5.2	Noise and Vibration	57
5.3	Ornithology	60
5.4	Socio-economics and Land Use.....	63
5.5	Health and Wellbeing	65
5.6	Materials and Waste.....	68
5.7	Tourism and Recreation	69
5.8	Air Quality	71
5.9	Carbon and Climate Change	74
5.10	Risk of Major Accidents and Disasters	77
5.11	Other Environmental Topics.....	79

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

- 1.0.1 On 07 April 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Tarchon Energy Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Tarchon Interconnector Project (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/EN0210009>
- 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'](#)

- 1.0.8 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 Sections 1-5)

ID	Ref	Description	Inspectorate's comments
201	Section 1.2.1	Intertidal zone	The Scoping Report divides the UK scheme scoping boundary into the English Onshore Scheme (EOS) and UK Marine Scheme (UKMS) to differentiate between the onshore and offshore components. The Inspectorate notes that EOS and UKMS scoping boundaries overlap in the intertidal zone to ensure intertidal receptors and potential interactions between marine and terrestrial activities are assessed. The ES should be clear what activities fall into the EOS and UKMS and ensure consistency across chapters. Where activities fall within the intertidal zone, it should be clear where the assessment of effects can be found to avoid gaps or double counting in the assessment. This should be supported by figures at an appropriate scale.
202	Sections 2.2 and 2.4	Design envelope/ Maximum Design Senario (MDS)	The Inspectorate notes the intention to define a design envelope or MDS within the ES to seek flexibility and address uncertainty. The applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the proposed development have yet to be finalised and provide the reasons. 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 Development Consent Order (DCO) application, the applicant may wish to consider requesting a new scoping opinion.

ID	Ref	Description	Inspectorate's comments
203	Sections 2.3, 2.4.4, 2.4.5 and 2.4.7	Landfall	The Inspectorate notes the potential for the cable landfall to be installed in the intertidal area either through the use of trenchless techniques, such as Horizontal Directional Drilling (HDD) or micro tunnelling, or through open cut trenching. The ES should assess the potential worst-case environmental effects of the cable landfall during construction, operation and decommissioning. This should also demonstrate how design decisions have considered the environmental effects of potential alternatives. The ES should assess significant effects associated with the anticipated changes at the coastal landfall site throughout the lifetime of the proposed development. The assessment should address, both vertical change in beach profile and the effects from coastal retreat. The ES should describe how cable burial and siting of associated infrastructure will be managed throughout the lifespan of the proposed development.
204	Sections 2.3 and 2.4.5	Joint bays and link boxes	The Scoping Report identifies the need for joint bays at interfaces between EOS cable sections at regular intervals expected to be between 800m and 1,500m and link boxes at each cable joint. However, the Scoping Report does not define whether their locations will be determined by the time the application is made. The Inspectorate anticipates this may not be the case. If uncertainty persists, the ES should identify a worst-case scenario for the number of jointing points and link boxes that may be required, and their impact during all project phases.
205	Sections 2.3 and 2.4.3	Offshore cable installation – crossings	The Inspectorate notes that up to two High Voltage Direct Current (HVDC) cables (up to 20km long) and one fibre optic cable will be bundled together and installed in a single trench connecting the converter station to the UK landfall and up to six High Voltage Alternating Current (HVAC) cables (up to 5km long) in two circuits, plus two fibre optic cables will be bundled and installed in two trenches linking the converter station to the grid connection point. However, as the location of the converter station and the onshore cable route are not yet confirmed, it is not yet clear whether any (or how many) temporary or permanent crossings of watercourses, major roads and/ or railways would be required. The ES should identify the locations and types of all such crossings and assess the likely significant effects from accidental release of drilling fluids, where HDD methods are proposed to be used. The ES should include reference to the measures that will be taken to prevent impacts from occurring. Where reliance is placed on the use of a specific method to mitigate significant effects, the applicant should ensure that such commitments

ID	Ref	Description	Inspectorate's comments
			are appropriately defined and secured. The applicant should seek to agree the depths of trenchless crossings (such as HDD) below watercourses with the relevant consultation bodies, including the Environment Agency and Internal Drainage Boards, as appropriate.
206	Sections 2.3 and 2.4.3	Offshore cable protection	The Inspectorate notes that the UKMS is targeting 80% cable burial based on current knowledge of the site and that the sub-sea cable bundle will be surface laid where burial is not achievable due to surrounding conditions. The Inspectorate also notes the applicant plans to undertake a Cable Burial Plan (CBP) and Cable Burial Risk Assessment (CBRA). The ES should clearly explain where and why target burial depths may not be achievable. Burial could be achieved through a number of techniques dependent on seabed conditions, and where burial is not possible protection measures could be used. The CBP and CBRA should be submitted alongside the ES where available. The ES should explain which burial techniques are to be used in which locations and, where a final decision has not been made, include an assessment of the effects using the worst-case scenario. It should detail the maximum volume of material required for cable protection and explain how this has been quantified.
207	Paragraphs 2.4.2.10 to 2.4.2.15	Seabed preparation	The Inspectorate notes the requirement for seabed preparation activities in advance of cable installation but that 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.
208	Section 2.4.2.15	Trailing Suction Hopper Dredgers (TSHD)	The Scoping Report states that TSHD is one of three potential installation tools for the HVDC cable, however, it is not clear if impacts from TSHD have been assessed. The ES should clearly assess impacts from TSHD within the relevant aspect chapters. The applicant's attention is drawn to comments from the Environment Agency (at appendix 2 of this Opinion) regarding potential impacts from TSHD on European eel.
209	Paragraph 2.4.4.15	Temporary access roads and vehicle movements during construction	The Scoping Report states that a temporary access road to the UK landfall is likely to be required. The ES should describe the location and parameters of temporary access routes, including any changes proposed to the existing highway, and confirm the predicted number/ type of traffic movements required. Where details are unknown, a worst-case scenario should be presented. If crossing of watercourses and culverts are required, these should be discussed and agreed with the EA.

ID	Ref	Description	Inspectorate's comments
20.10	Section 2.4.6	Construction of the converter station	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.
20.11	Paragraphs 2.4.6.8 and 2.5.6.9	Temporary construction compound(s)	The Inspectorate notes that a temporary construction compound will be needed for the construction of the converter station. The ES should describe the proposed number, location and parameters of temporary construction compounds and laydown areas required during construction and decommissioning of the proposed development. The ES should assess any likely significant effects arising from these works.
20.12	Section 2.4.8	Connection to National Grid East Anglia Connection Node (EACN) substation	The Scoping Report identifies the proposed development's connection with other proposed and/ or planned infrastructure projects. The ES should describe the relationship between the proposed development and any connected projects, including the use of figures. This should include the extent to which the proposed development is dependent on their delivery and the development timelines of other projects (including the predicted lifespans once operational), with an explanation of how these will be coordinated to reduce environmental effects. Any assumptions made about connected projects should be explained, together with any uncertainty remaining and how this is addressed in the assessment.
20.13	Sections 2.5, 2.6 and 2.7	Vessel movements	The ES should describe the expected number, type and frequency of vessel movements required to construct, operate and decommission the proposed development. If these are unknown, then the ES should explain the assumptions that have been made about vessel movements to inform assessment using a worst-case scenario.
20.14	Section 2.7	Decommissioning	The Scoping Report states that at the end of the operational lifetime, the UK scheme would be decommissioned, and offshore cables may be left in-situ or removed. The Inspectorate notes that an outline Decommissioning Environmental Management Plan (DEMP) will be prepared in the ES. 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 6)

ID	Ref	Description	Inspectorate's comments
211	Section 5.7.1	Good design	The summary of guidance advice notes does not mention the Nationally Significant Infrastructure Projects: Advice on Good Design. The applicant is encouraged to review this advice and incorporate the principles into the proposed development.
212	Section 6.3	Future baseline	The ES should clearly explain which other developments will be assumed to be under construction or operational as part of the assessment of the future baseline, with and without the proposed development.
213	Section 6.3	Baseline data	The Scoping Report indicates that the ES will utilise previous data collected as part of other applications for developments in the vicinity of the UK scheme, alongside data collected by the applicant specifically for the proposed development. The ES should utilise the most recently available representative datasets at the time of production. Data collected in relation to other projects and used within the ES for this proposed development should be clearly referenced; and the ES should include an explanation of why that data is considered applicable and (where not updated) considered to remain representative of the current state of the environment. The applicant should make effort to agree the suitability of information used for the assessments in the ES with relevant consultation bodies.
214	Section 6.4	Mitigation and monitoring	The ES should clearly describe the details of any avoidance and mitigation measures to be implemented, along with associated monitoring, reporting, and adaptive management. These should be agreed, if possible, with relevant consultation bodies and the ES should explain how they would be secured.
215	Paragraph 6.6.1.7	Professional judgement	The ES should provide evidence to support conclusions or clearly identify where professional judgement has been relied upon to determine the magnitude of impacts

ID	Ref	Description	Inspectorate's comments
			or the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
21.6	Volume 5	Scoped in and scoped out effects - consistency	The Inspectorate notes that there are some inconsistencies between the effects scoped in/ out within aspect tables and those set out in the summary tables in Scoping Report volume 5. The applicant should ensure that where summary tables are used, that the content is consistent with the relevant aspect chapters.
21.7	Section 6.7 and volume 5, chapter 32	Cumulative effects assessment (CEA)	The Inspectorate notes that the approach to the cumulative assessment is set out in volume 5, chapter 32 of the Scoping Report. 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 Essex County Council, Natural England, Tendring District Council and others in appendix 2 of this Opinion that contain comments on proposed developments for consideration within the CES. 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.
21.8	Section 6.8 and volume 6, chapter 32, annex 32-1	Transboundary	The Inspectorate notes the applicant's preliminary transboundary screening is provided in volume 06, chapter 32, annex 32-1 of the Scoping Report and screens the following UKMS aspects in for further consideration in the ES: • marine physical environment • benthic and intertidal ecology • fish and shellfish ecology • marine mammal ecology • commercial fisheries

ID	Ref	Description	Inspectorate's comments
			• shipping and navigation • offshore archaeology and cultural heritage • offshore infrastructure and other users • offshore ornithology • carbon and climate change • risk of major accidents and disasters The Inspectorate recommends that the ES should identify whether the proposed development has the potential for significant transboundary effects, and if so, what these are, and which EEA States would be affected. The Inspectorate will be undertaking a transboundary screening on behalf of the Secretary of State in due course.
21.9	n/a	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development will be shared with the relevant Local Environmental Records Centres, The Crown Estate's Marine Data Exchange, the JNCC's Marine Noise Registry, and any other relevant environmental recording schemes, in line with best practice.

3. ENVIRONMENTAL ASPECT COMMENTS – ONSHORE ENVIRONMENT

3.1 Ground Conditions and Contamination

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraphs 7.5.10.7 and 7.7.3.1	Operation	The applicant proposes to scope out this matter on the basis that there would be no potential impact pathways on ground conditions and contamination once construction is complete. However, paragraph 7.5.10.7 of the Scoping Report identifies potential risks to ground conditions and contamination during operation of the proposed development, including escape of firefighting foams in the event of a fire, escape of subsurface cabling insulating fluids and heat pollution of contacted groundwater. As a result, the Inspectorate is not in a position to agree to scope this matter out of further assessment. The ES should include an assessment of the potential effects on ground conditions and contamination during operation or provide evidence, demonstrating agreement with relevant consultation bodies, and the absence of likely significant effects.
3.1.2	Table 7-7	Hydrogeological and hydrological effects (construction and decommissioning)	The Scoping Report states that potential effects from the proposed development on hydrogeological and hydrological setting would be included within the water environment assessment. On this basis, the Inspectorate agrees that this this matter can be scoped out of the ground conditions and contamination chapter of the ES.

ID	Ref	Description	Inspectorate's comments
3.1.3	Section 7.2	Study area	A 250m buffer is proposed around the scoping boundary for the land contamination study area, and 1km from the scoping boundary for terrestrial hydrogeology study area. The applicant should seek to agree a study area with the relevant consultation bodies, state why this is appropriate in accordance with relevant guidance and ensure all sites and receptors within the scoping boundary are included within the assessment.

ID	Ref	Description	Inspectorate's comments
3.14	Section 7.3.3	Guidance document	The Inspectorate also suggests consideration of the Institute of Sustainability and Environmental Professionals (ISEP) Guidance – Land and Soil in EIA (2022).
3.15	Section 7.5	Intrusive investigation	The ES should include a full description of any further intrusive investigation and survey work required and confirm how this is to be secured. Effort should be made to agree the scope with all relevant consultation bodies, for example, the EA and local planning authorities where it relates to land within their administrative area.
3.16	n/a	Figures	The ES should provide figures to support the description of the baseline conditions, including illustrating location of relevant sensitive receptors and designated sites.

3.2 Water Environment

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 8-7	Assessment of following surface water receptors: • Unnamed tributary of 'Holland Brook Water Body' (HB2) • Unnamed reservoir (SW4) • Unnamed ordinary watercourse (MB3) • Unnamed ordinary watercourse (MB4) • Unnamed reservoir (SW7) • Unnamed reservoirs (SW8) • Unnamed pond (SW9) • Unnamed reservoirs (SW10)	The applicant proposes to scope out an assessment of the proposed development on these surface water receptors on the basis that there is no hydrological connectivity between them and the EOS. The Inspectorate agrees that the proposed development is unlikely to lead to significant effects on these surface water receptors and is content for these receptors to be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Dovercourt Boating Lake	
322	Table 8-7	Assessment of unnamed ordinary watercourse (RB7)	The Scoping Report states that the unnamed ordinary watercourse (RB7) has already been substantially altered and any impacts due to the proposed development are unlikely to further adversely impact this watercourse. On this basis, the Inspectorate agrees to scope this matter out of further assessment.
323	Table 8-18	Groundwater effects (operation)	The Scoping Report proposes to scope out this matter on the basis that no works would connect to aquifers and permanent foundations and other below ground infrastructure would be designed to maintain groundwater flow and not lead to changes in groundwater quality or quantity during operation. However, paragraph 7.5.10.7 of the Scoping Report identifies potential risks to groundwater during operation of the proposed development, including escape of firefighting foams in the event of a fire, escape of subsurface cabling insulating fluids and heat pollution of contacted groundwater. As a result, the Inspectorate is not in a position to agree to scope this matter out of further assessment. The ES should include an assessment of the potential effects on groundwater during operation or provide evidence, demonstrating agreement with relevant consultation bodies, and the absence of likely significant effects.
324	Table 8-18	Hydromorphology effects (operation)	The Scoping Report states that following construction watercourses would be reinstated following the principles of geomorphologically sensitive design and the EA and the Lead Local Flood Authority (LLFA) Essex County Council would be consulted on the design of any permanent watercourse crossings and proposes to scope this matter out of further assessment. The Inspectorate agrees that this matter can be scoped out provided that the construction phase assessment considers the permanent changes introduced by the proposed development, such as impacts on flow regime or sediment dynamics, and that any mitigation required to avoid likely significant effects is described in the ES and demonstrably secured in the draft Development Consent Order (dDCO).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
325	Table 8-18	Water resources (operation)	The Scoping Report proposes to scope out this matter on the basis that no works would connect to aquifers and permanent foundations and other below ground infrastructure would be designed to maintain groundwater flow. Paragraph 8.8.1.10 states that water supply would be required for the future operation of any above-ground facilities; however, no information has been provided on the volume of water required during operation. The applicant is also directed to Anglian Water's consultation response in appendix 2 of this Opinion. Anglian Water request that a Water Resources Assessment (WRA) is provided to form part of the EIA setting out daily water demand for each stage of the proposed development, including operation. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.

ID	Ref	Description	Inspectorate's comments
326	Paragraph 8.5.1.2	Baseline data sources – flood and coastal erosion risk data	The ES should also consider the Environment Agency's flood and coastal erosion risk data published 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.
327	Paragraph 8.5.1.36	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

ID	Ref	Description	Inspectorate's comments
			probability of flooding' and 'functional floodplain'. The ES should include a figure to illustrate the extent of Flood Zones 3a and 3b.
328	Paragraph 8.7.3.3	Watercourse crossings	The ES should describe the number, location and types of watercourse crossings required for the proposed development and assess impacts where there is the potential for significant effects to occur. The ES should consider the potential of such works to negatively impact watercourses within the study area, including the ecological status of any watercourses protected under the Water Framework Directive. Effort should be made to agree the approach and appropriate location(s) with the relevant consultation bodies and should drilling fluid be used in construction, a breakout plan should be produced, submitted and secured in the application.
329	n/a	Vulnerability to flood risk	The applicant should ensure that an assessment of the proposed development's vulnerability to flooding is provided in the ES with clear cross referencing to the Flood Risk Assessment (FRA), where appropriate. The applicant is directed to the consultation response form the Environment Agency at appendix 2 of this Opinion in this regard.
3210	n/a	Existing flood defences	The Scoping Report contains limited information about the existing coastal and fluvial flood defences, which could be affected by the proposed development. The ES should clearly include in the baseline, a description of existing (and where relevant, proposed) flood defences that could be impacted by the proposed development, together with figures showing their location. Effort should be made to agree the extent of baseline information required with relevant consultation bodies, including the EA.
3211	n/a	Water demand	The estimated water demand for the proposed development, including the volume of water required during each phase is not set out in the Scoping Report. The ES should describe the water demands for the proposed development and identify appropriate supply resources. Where water demands are identified, the ES should assess any associated significant effects, including within other relevant chapters and with appropriate cross-references within the water environment chapter. For example, if water

ID	Ref	Description	Inspectorate's comments
			requires to be tankered in, any implications should be considered in the traffic and transport chapter.
3212	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.

3.3 Land Use, Soils and Agriculture

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 9-6	Agricultural land (operation)	The Scoping Report states that there is limited potential for operational activities to adversely impact agricultural land. The Inspectorate agrees that operation of the proposed development is unlikely to result in significant effects on agricultural land and is content for this matter to be scoped out of further assessment.
332	Table 9-6	Soil resources (operation)	The Scoping Report states that operational activities have limited potential to disturb soil resources and any maintenance works would be confined to small, discrete areas. The Inspectorate agrees that operation of the proposed development is unlikely to result in significant effects on soil resources and is content for this matter to be scoped out of further assessment.
333	Paragraph 9.3.3.9 and table 9-6	Electromagnetic Field (EMF) effects on agricultural land and soil resources	The applicant proposes to scope out the effects of EMFs on agricultural land and soil resources from underground cables on the basis that there is " <i>little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences</i> ". Provided the proposed development complies with relevant EMF guidelines in its operation, the Inspectorate agrees that it is unlikely that EMF effects on agricultural land and soil resources would be significant and is content for this matter to be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
334	Section 9.5.1	Agricultural land	The ES should contain a clear tabulation of the areas of land in each 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

ID	Ref	Description	Inspectorate's comments
			of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.
335	Section 9.5.3	Future surveys	The Scoping Report states that additional data is proposed to be obtained from future surveys. The Inspectorate advises that any survey effort should be sufficient to establish the baseline condition to enable a robust impact assessment. The ES should describe the final survey method and extent, with evidence of agreement with relevant consultation bodies. The results of the survey work should be described in the ES, including supporting figures that show land within different agricultural land classification (ALC) grades. In the description of baseline conditions, the applicant should also refer to the updated predictive ALC map for England.
336	Paragraph 9.6.1.2	Decommissioning	Paragraph 9.6.1.2 of the Scoping Report states that decommissioning effects on agricultural land and soil resources will not be specifically assessed within the ES as the precise method for decommissioning is currently unknown. However, impacts during decommissioning are expected to be similar to, or of a lesser magnitude than, construction effects. As a result, to represent a worst case, decommissioning effects will be considered to be the same as construction phase effects. The Inspectorate is broadly content with this approach; however, if additional impacts are identified during decommissioning these should be clearly set out and assessed within the ES.

3.4 Onshore Biodiversity

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Paragraph 10.7.4.2 and table 10-7	Operational effects for buried onshore cables	The Scoping Report proposes to scope out an assessment of the following operational effects from buried onshore cables on onshore biodiversity, except for where permanent above ground infrastructure is present: • Impacts to terrestrial invertebrates • Impacts to reptiles • Impacts to hazel dormouse • Impacts to bats • Impacts to amphibians, including great crested newt (GCN) • Impacts to Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites located up to 10km from the EOS scoping boundary. • Impacts to statutory designated sites located up to 2km from the onshore scoping boundary • Impacts to non-statutory designated sites This is on the basis that the HVAC and HVDC cables cause no permanent above ground land take except for up to 25 small link boxes (2m by 2m) and after reinstatement, the land would be returned to agriculture or grassland with negligible operational phase ecological effect. In the absence of information on the access and maintenance activities required during the operational phase and evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree that impacts on the above receptors

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			can be scoped from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of LSE.
342	Table 10-7	Impacts on fish (operation)	The Scoping Report seeks to scope out an assessment of operational impacts on fish from disturbance to spawning or nursery habitats during water crossing works; sediment or pollution release, reduced water quality or interruption of flow patterns; and temporary barriers to movement along watercourses. This is on the basis that the operational phase entails no in-channel works, no routine access, no noise or vibration and no ongoing water quality pathway after construction controls and reinstatement, so significant operational effects are not anticipated. The Inspectorate is not in a position to agree to scope this matter out of the assessment. The applicant's attention is drawn to comments from the Environment Agency (at appendix 2 of this Opinion) in this regard. An assessment of EMF on fish should be included in the ES.
343	Table 10-7	Impacts to aquatic macrophytes and aquatic macro-invertebrates (operation)	Although not explicitly identified as a matter for scoping out, the Scoping Report infers an assessment of direct habitat loss, degradation of water quality and sedimentation on aquatic macrophytes and aquatic macro-invertebrates are scoped out of the ES during the operational phase. This is on the basis that impacts to aquatic macrophytes and aquatic macro-invertebrates are scoped in for construction and decommissioning when crossing suitable watercourses has the potential to lead to effects on macrophytes and macro-invertebrates. The Inspectorate is content to scope this matter out.

ID	Ref	Description	Inspectorate's comments
344	Section 10.2	Study area for designated sites	The Inspectorate notes that the Scoping Report proposes a 10km and 2km study area for international and national designated sites, respectively. The ES should ensure the study area for each ecological receptor reflects the proposed development's Zone of Influence

ID	Ref	Description	Inspectorate's comments
			(Zol) rather than being based on a fixed distance. The impact assessment should be based on the Zol from the proposed development and any sensitive receptors. Clear justification should be provided to support any distances applied. In relation to internationally designated sites, the ES should consider the potential for effects to occur beyond 10km particularly where sites are designated for mobile species such as birds, bats, fish, and otters. Efforts should be made to agree the study areas with relevant consultation bodies.
345	Paragraphs 10.2.1.2 and 10.5.7.3 and table 10-3	Ancient woodland and veteran trees	The Scoping Report sets out receptors upon which potential impacts have been considered in paragraph 10.2.1.2 of the Scoping Report. However, this does not include ancient woodland or veteran trees. The Inspectorate notes that the location of ancient woodland and veteran trees have been included in the scoping baseline and that the applicant's intention is to avoid ancient woodland wherever possible. The proposed development should avoid ancient woodland as an irreplaceable habitat. The applicant's attention is drawn to comments from the Forestry Commission, Natural England and Essex County Council (at appendix 2 of this Opinion) in this regard. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
346	Paragraph 10.3.2.1 and section 10.7.3	Biodiversity Net Gain (BNG)	The Scoping Report states that a BNG calculation will be submitted as part of the dDCO application using the statutory biodiversity metric, however BNG (Irreplaceable Habitat) Regulations 2024 are omitted from the list of legislation considered. The ES should include this legislation in the list and ensure the proposed development meets the requirements. The ES should clearly differentiate between essential mitigation and enhancement that is proposed as part of the DCO.
347	Section 10.5.1	Fish survey data	The data sources listed which have informed the scoping baseline does not mention the Environment Agency's fish survey data. The ES should use this data to inform the baseline.
348	Table 10-4	Proposed field survey scope	The Inspectorate notes that the proposed scope of field surveys for most protected and/ or notable species, includes a buffer depending on boundary refinement or where deemed necessary. The ES should provide a clear rationale and a justification as to the approach undertaken to the study area for each ecological receptor and surveys used to inform the assessment. The Inspectorate advises that, amongst other matters, effort is made to agree with relevant consultation bodies the scope of the proposed field surveys.

ID	Ref	Description	Inspectorate's comments
34.9	Table 10-4	Surveys for GCN	The Scoping Report identifies a buffer of 250m for amphibians including GCN; however, depending on the habitats present, connectivity and the nature and scale of the proposed development, it may be necessary to extend this survey area to 500m. The applicant should make effort to agree the survey extent with Natural England, or provide suitable justification for the extent of the surveys undertaken.
34.10	Table 10-4	District Level Licensing (DLL)	The Scoping Report describes the applicant's intention to not undertake population size class surveys as it is assumed that if a licence is required a DLL registration will be gained in consultation with NE. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, Natural England will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
34.11	Table 10-6 and paragraph 10.7.2.5	Trenchless techniques such as HDD	The Inspectorate notes that trenchless methods of cable laying, such as HDD, are being considered as a form of mitigation. The ES should confirm where trenchless techniques will be employed. Where HDD is proposed to be employed, the ES should assess impacts, such as from drilling fluid breakout and/ or noise and vibration, where significant effects are likely to occur. Should this have the potential to impact on sensitive ecological receptors, such as fish and other freshwater species or sensitive habitats, appropriate mitigation should be described in the ES and appropriately secured through the dDCO or other legal mechanism. The approach to assessment should be discussed and where possible agreed with relevant consultation bodies.
34.12	n/a	Habitat severance	The applicant's attention is drawn to comments from Natural England (at appendix 2 of this Opinion) regarding the need to include an assessment of impacts of severance on biodiversity and the functionality of habitats at a landscape scale within the ES.

ID	Ref	Description	Inspectorate's comments
34.13	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.

3.5 Onshore Archaeology and Cultural Heritage

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 11-6	Setting impacts on designated heritage assets from the proposed converter station (construction)	The Scoping Report proposes to scope out an assessment of temporary setting impacts on designated heritage assets from the construction of the proposed converter station. This is on the basis that the effects will be assessed as an operational effect, as a worst-case scenario, as this is where the maximum effect will take place. The Scoping Report does not provide justification as to why all project phases will not temporarily change the setting of heritage assets. Additionally, the design and location of the converter station has not been finalised, and if it was to be located close to a heritage asset this could result in a significant effect. The applicant's attention is drawn to comments from Essex County Council at appendix 2 of this Opinion regarding the potential for impacts arising from the converter station and need for embedded mitigation measures. The Inspectorate is therefore unable to agree to scope this matter out, and the ES should include an assessment of impacts from the construction of the converter station on the setting of heritage assets or evidence demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.
3.5.2	Table 11-6	Impacts to setting of designated heritage assets from landfall and onshore cable route (operation)	The Scoping Report proposes to scope out an assessment of impacts to setting of designated heritage assets from landfall and the onshore cable during operation of the proposed development. This is on the basis that there would be no further impacts arising post construction given the predominantly below-ground nature of this infrastructure. The Inspectorate agrees that likely significant effects on the settings of above ground heritage assets during operation of the proposed development (excluding converter stations) are unlikely and is content that this matter can be scoped out of further assessment.
3.5.3	Table 11-6	Effects to buried archaeological remains from the	The Scoping Report seeks to scope out physical effects to buried archaeological remains during operation and decommissioning on the basis that physical disturbance would occur during construction. The Inspectorate considers that potential indirect impacts to archaeology remaining in situ during operation may include impacts from alteration of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		EOS (operation and decommissioning)	drainage patterns as a result of the existence of the proposed development. The applicant's attention is drawn to comments from Historic England (at appendix 2 of this Opinion), which further highlight the potential for damage to archaeological and palaeoenvironmental remains during operation resulting from changes to groundwater levels, or from any heat emitted from the buried cables. These effects should be assessed within the ES, with cross-references to the water environment ES chapter. Furthermore, there is potential for ground disturbance during decommissioning and effects are likely to be similar to those experienced during construction. Accordingly, the ES should include an assessment of this matter or demonstrate the absence of likely significant effects with agreement from the relevant consultation bodies.
354	Table 11-6	Effects to buried archaeological remains from landfall, onshore cable route and converter stations (decommissioning)	The applicant proposes to scope out impacts on buried archaeological remains arising from decommissioning of the proposed development on the basis that, similar to the operational phase, no additional land take is proposed and that physical disturbance would have occurred during construction. However, in the absence of information on the precise decommissioning activities and works that would be required, the Inspectorate is not in a position to scope this matter out at this stage. Accordingly, the ES should consider whether any additional below-ground disturbance could occur at decommissioning, and where there is potential for likely significant effects, these should be assessed, or further justification provided as to why such effects would not arise.
355	Table 11-6	Effects to historic hedgerows from onshore cable route and converter station (operation and decommissioning)	The Scoping Report proposes to scope out an assessment of loss or fragmentation to archaeologically or historically important hedgerows from the onshore cable route and converter station, on the basis that effects are likely to take place during construction and no additional land take is proposed. However, in the absence of information on the precise operation and decommissioning activities and works that would be required, the Inspectorate is not in a position to scope this matter out at this stage. Accordingly, the ES should consider whether any additional loss or fragmentation to archaeologically or historically important hedgerows could occur during the operational and decommissioning phases, and where there is potential for likely

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			significant effects, these should be assessed, or further justification provided as to why such effects would not arise.

ID	Ref	Description	Inspectorate's comments
35.6	n/a	Non-designated heritage assets	The Scoping Report identifies non-designated heritage assets using Essex Historic Environment Record (HER) data within a 500m radius of the EOS scoping boundary, as shown in figures 11-2 to 11-4. However, the scope of the assessment in table 11-6 of the Scoping Report only refers to designated heritage assets, it is not clear if potential effects on non-designated heritage assets are assessed. The ES should consider potential effects on non-designated heritage assets are included alongside the assessment of effects on designated heritage assets.
35.7	n/a	Zone of Theoretical Visibility (ZTV)	The Scoping Report states that a ZTV will be developed to identify potential visual and setting impacts on heritage assets. The Inspectorate considers that the assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the proposed development. Effort should be made to agree appropriate viewpoint locations and such visualisations with relevant consultation bodies.
35.8	n/a	Effects of changes to drainage on designated and non-designated heritage assets	The EOS elements of the proposed development have potential to alter the pattern of drainage within and adjacent to the boundary of works. Impacts on heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where significant effects are likely to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to the water environment ES Chapter should be considered.
35.9	Paragraph 11.5.1.4	Heritage assets- Grade II listed buildings	The Scoping Report identifies that the Grade II* listed Church of St Mary's (1337175) is located within the EOS scoping boundary, which will be included in the assessment of effects on the setting of designated heritage assets. The applicant's attention is drawn to the comments of Historic England at appendix 2 of this Opinion, who recommend that the Grade II listed Old Rectory (LEN 1111420) and Little Bromley War Memorial (LEN

ID	Ref	Description	Inspectorate's comments
			1493299) should also be assessed for their group value in association with the Grade II* listed church.
35.10	n/a	Bentonite slurry outbreak	The applicant's attention is drawn to the comments of Historic England (at appendix 2 of this Opinion), which note that trenchless techniques, such as HDD at the cable landfall or along buried cable routes, have the potential to result in bentonite slurry breakout. This may result in direct or indirect impacts on buried archaeological remains, which should be assessed within the ES.
35.11	n/a	Potential inter-related effects with ground conditions	Impacts on archaeological and palaeoenvironmental remains from the movement of contaminants or pollutants should be assessed in the ES, where significant effects are likely to occur, with cross-reference to the ground conditions chapter. The applicant's attention is directed to comments from Historic England at appendix 2 of this Opinion.
35.12	n/a	Geoarchaeological deposits	Consideration should be given to the geoarchaeological potential of the site. Historic England (at appendix 2 of this Opinion) identify the potential for Pleistocene and Holocene deposits within the onshore scoping boundary, and Essex County Council (at appendix 2 of this Opinion) further emphasise the need for these deposits to be considered within the baseline and assessed as part of the onshore archaeology and cultural heritage impact assessment.

3.6 Traffic and Transport

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 12-11	Impacts on the following traffic and transport receptors (operation): • road links • road junctions • Public Rights of Way (PRoW) • national/ regional walking and cycling routes	The Scoping Report states that vehicle movements associated with operation and maintenance activities would be minor, infrequent and short in duration (once every one to three years for up to three weeks), as a result the applicant proposes to scope out an assessment of operational phase traffic and transport impacts on these receptors. The Inspectorate agrees to scope this matter out subject to confirmation of vehicle types and number of movements required during operation of the proposed development in the ES, with reference to relevant thresholds.

ID	Ref	Description	Inspectorate's comments
36.2	Paragraph 12.2.1.2	Study area	The Inspectorate notes that the traffic and transport study area has been broadly defined in the Scoping Report and may be amended as more information becomes available about the construction of the proposed development. The baseline data gathering and assessments in the ES should be based on a study area which captures the full range of likely significant effects on both the strategic, national and local road networks. The study area should be agreed with relevant stakeholders.
36.3	Paragraph 12.7.3.3	Access and vehicle routes	The expected route(s) of construction traffic to access all areas of the proposed site, including the construction compound(s), and the anticipated numbers of vehicle movements during peak construction (including vehicle type, peak hour and daily

ID	Ref	Description	Inspectorate's comments
			movements) should be included in the ES. The location of vehicle routes and access points should be depicted on a supporting plan(s).
364	Paragraph 12.7.3.9	Abnormal indivisible loads (AILs)	The Scoping Report states that AILs would be required to transport items, such as the transformers, to the proposed development. The impacts on safety from the delivery of AILs should be assessed within the ES where significant effects are likely to arise. Appropriate measures to ensure safe transportation of hazardous loads (if any) should be described and secured in the dDCO.

4. ENVIRONMENTAL ASPECT COMMENTS – OFFSHORE ENVIRONMENT

4.1 Marine Physical Environment

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	Table 13-13	Impacts on bathing waters, WFD coastal and transitional waterbodies, shellfish waters, Nutrient Sensitive Zones and the wider marine environment (operation)	The Scoping Report seeks to scope out impacts from deterioration of water quality due to release and suspension of sediments from seabed preparation and removal during the operational phase. The Inspectorate agrees there would be no pathway for effect and that this matter may be scoped out of further assessment. However, with regards to maintenance of the cable, including any cable repair, or repair work to scour protection, the ES should explain how this would be undertaken and assess any likely significant effects of these activities.
4.1.2	Table 13-13	Impacts on the coast at landfall, Hamford Water SSSI (operation)	The Scoping Report proposes to scope in an assessment of impacts on Hamford Water SSSI during construction and decommissioning, the Inspectorate considers that impacts on this site should also be considered with regards to activities which may be required at landfall during operation and maintenance, where significant effects may occur.
4.1.3	Tables 13-13 and 34-2	Accidental release of spills of materials/ chemicals (all phases)	The Scoping Report seeks to scope out an assessment of the accidental release of spills of materials and/ or chemicals during all phases of the proposed development on all receptors. This is on the basis that all vessels which will be working in the UKMS would be required to adhere to environmental controls which will be included in a draft Construction and Environmental Management Plan (CEMP). On this basis, the Inspectorate agrees this matter may be scoped out of further assessment, noting that the applicant has committed in paragraph 2.4.4.5 to provide an

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			outline CEMP. The ES should provide details of the proposed mitigation measures to be included in the CEMP.
4.14	Tables 13-13 and 34-2 paragraphs 13.5.2.17 and 14.2.1.3	Impacts from seabed scouring on Margate and Long Sands SAC, offshore sandbanks, and important navigation channels (operation and maintenance)	The Scoping Report states that cable protection measures would be used if cable burial is not possible, and these may act as an obstacle to hydrodynamic flows and result in localised scouring of the seabed. Potential impacts also include erosion of sediment from the seabed which could result in bathymetric changes and localised alterations to sediment transport patterns. The Scoping Report states that impacts would be small scale and localised. No evidence such as modelling is provided to confirm there would be no significant impacts on Margate and Long Sands SAC which directly overlaps with the scoping boundary of UKMS. Paragraph 14.2.1.3 states that in a worst-case scenario, sediment could drift up to 16.5km from the scoping boundary as a result of seabed activities. There is also insufficient information regarding seabed material, seabed mobility, and sensitivity of receptors. The applicant's attention is drawn to the response from Natural England (at appendix 2 of this Opinion) in this regard. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters out from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
4.15	Table 13-1	Baseline data	The applicant's attention is drawn to comments from Natural England (at appendix 2 of this Opinion) regarding dates of certain information sources and reliance upon existing data sources. The ES should utilise the most recently available representative datasets at the time of production. Data collected in relation to other projects and used within the ES

ID	Ref	Description	Inspectorate's comments
			for this proposed development should be clearly referenced; and the ES should include an explanation of why that data is considered applicable and (where not updated) considered to remain representative of the current state of the environment.
4.1.6	Figure 13-5 and paragraph 29.5.1.6	Erosion rates	The Inspectorate notes that the Scoping Report references erosion data from 2004 and 2008. Figure 13-5 shows annual rates of erosion for coastal transects is taken from the Environment Agency, dated 2008 and paragraph 29.5.1.6 refers to a previous study on coastal erosion from 2004. The ES should either include updated information regarding rates of erosion which includes the influence of climate change or justify why the data from 2004 and 2008 is robust enough to be relied upon.
4.1.7	n/a	Location of landfall	The applicant's attention is drawn to the response from Essex County Council (at appendix 2 of this Opinion) regarding the need for the landfall location to be situated outside of current and future tidal flood zones, be made water compatible or engaged with the Environment Agency to secure funding for ongoing sea defence.
4.1.8	n/a	Effects from climate change	Climate change is referred to within the marine and physical environment chapter of the Scoping Report, however it is unclear how this would inform the marine physical environment assessment. The ES should ensure that the assessment includes consideration of the potential effects of climate change, for example, sea levels rise, extreme wave height and coastal erosion. The applicant's attention is drawn to comments from Natural England (at appendix 2 of this Opinion) in this regard.

4.2 Benthic and Intertidal Ecology

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
421	Table 14-6	Impacts from temporary increase in suspended sediment and direct and indirect seabed disturbance leading to release of sediments (operation)	The Scoping Report proposes to scope in an assessment of impacts on all subtidal and intertidal receptors during construction and decommissioning from increases and releases of sediments. The Inspectorate considers that impacts on these receptors should also be considered with regards to activities which may be required during the operation and maintenance phase and as such, this should be assessed in the ES where significant effects may occur.
422	Table 14-6	Impacts from long-term habitat loss or alteration due to the addition of infrastructure (construction)	The Scoping Report proposes to scope in an assessment of impacts from long-term habitat loss from the addition of infrastructure during the operational phase. However, the Inspectorate considers that an assessment of impacts during the construction phase should also be considered. The applicant's attention is drawn to comments from the Joint Nature Conservation Committee and Marine Management Organisation (at appendix 2 of this Opinion) in this regard.
423	Table 14-6	Impacts from long term habitat loss, colonisation of hard substrates, changes in marine physical process and EMF (construction)	The Scoping Report proposes to scope out an assessment of impacts on subtidal receptors during construction, due to a lack of pathway for effect. The Inspectorate agrees that this matter may be scoped out of further assessment.
424	Table 14-6	Impacts from presence of new infrastructure (construction and decommissioning)	The Scoping Report seeks to scope out an assessment of impacts on all subtidal receptors as a result of long-term habitat loss, colonisation of hard substrates, changes in marine physical processes and EMF. The Inspectorate notes these impacts will be assessed

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			during the operational phase, and as such agrees this matter may be scoped out for the construction and decommissioning phases.
425	Table 14-6	Removal of offshore cable and cable protection (operation and maintenance)	The Scoping Report seeks to scope out an assessment of impacts on all subtidal receptors as a result of long-term habitat loss of alteration due to the removal of infrastructure. The Inspectorate notes that these impacts will be assessed during the decommissioning phase and as such, agrees this matter may be scoped out for the construction and operational phases.
426	Tables 14-6 and 34-2	Accidental pollution events (all phases)	The Scoping Report seeks to scope out impacts on all subtidal and intertidal receptors resulting from accidental pollution events. The Scoping Report explains that chemical and oil inventories on vessels will be small and PLONOR (Pose Little or No Risk to the Environment) substances will be used where practicable for the trenchless crossings. All vessels will also be required to comply with environmental controls which will be included within the outline CEMP. On this basis, the Inspectorate agrees this matter may be scoped out of further assessment, noting that the applicant has committed in paragraph 2.4.4.5 to provide an outline CEMP. However, the ES should provide details of the proposed mitigation measures to be included in the CEMP. The ES should also explain what methods would be implemented where use of PLONOR substance(s) is not possible. The applicant's attention is drawn to the response from Natural England (at appendix 2 of this opinion) with regard to the provision of a HDD management plan to manage bentonite frac-outs.

ID	Ref	Description	Inspectorate's comments
427	Sections 14.5 and 15.5 and	Baseline	Details regarding site specific surveys relating to benthic ecology are included in the Fish and Shellfish Ecology chapter of the Scoping Report. The Inspectorate considers these should be included in the Benthic and Intertidal Ecology chapter of the ES where the information provided from these surveys will inform the benthic ecology assessment.

ID	Ref	Description	Inspectorate's comments
	paragraph 14.5.2.5		The ES should ensure that baseline information is up to date and directly relevant to the proposed development to ensure a robust assessment, the applicant's attention is drawn to the response from Natural England (appendix 2) in this regard.
428	Paragraph 14.4.1.4	Impacts on mussel beds	The Scoping Report states that Natural England have requested a survey of the mussel beds near the southern landfall option. The survey methodology and results of the survey work should be provided with the ES. The ES should explore potential pathways for effects, such as smothering from release of sediment from seabed activities and explain any necessary mitigation and how this would be secured.
429	Table 14-2	Southern North Sea SAC	Table 14-2 of the Scoping Report identifies designated sites which are relevant to benthic and intertidal ecology. The Inspectorate notes that the Southern North Sea SAC is shown on figure 14-4 and is identified as being relevant for fish and shellfish and marine mammals. The ES should also consider the relevance of the Southern North Sea SAC with regards to indirect impacts on benthic species which are a food source for prey species of harbour porpoise.
4210	Figure 14-4	Southern North Sea SAC	The ES should explain why the Southern North Sea SAC is differentiated between summer area, summer and winter area and winter area. The relevance of this to benthic and intertidal ecology should be fully explained in the ES.
4211	Paragraph 14.7.4.3	Cumulative effects assessment (CEA)	The Scoping Report states that the only pathway for effect for the CEA for benthic ecology is from cumulative temporary increases in suspended sediment and sediment deposition. It is considered that insufficient evidence has been provided for other pathways to be scoped out of the CEA at this stage. Accordingly, the ES should include other potential pathways for effect in the CEA where significant effects may occur. The applicant's attention is drawn to the response from Natural England (at appendix 2 of this Opinion) in this regard.
4212	Table 14-6 and	Unexploded Ordnance (UXO)	The Scoping Report states that licensing for UXO work, including any necessary clearance will be subject to separate and standalone licences. The Inspectorate considers that

ID	Ref	Description	Inspectorate's comments
	paragraph 15.1.1.3		potential effects from clearance of UXO should be provided in the benthic ecology chapter of the ES. The applicant's attention is drawn to the response from the Joint Nature Conservation Committee and Natural England (at appendix 2 of this Opinion) in this regard.
4213	n/a	Underwater noise	The Scoping Report does not make it clear whether the ES will include an assessment of effects on benthic ecology resulting from underwater noise. The Inspectorate considers that the ES should assess the potential effects of underwater noise during all phases of the proposed development. The applicant's attention is drawn to the response from Natural England (at appendix 2 of this Opinion) in this regard.

4.3 Fish and Shellfish Ecology

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	Table 15-11	Impacts from increases in suspended sediment concentrations (SSCs) and deposition of disturbed sediments and seabed disturbance leading to release of sediment contaminants (operation)	The Scoping Report seeks to scope out an assessment of impacts from seabed preparation and offshore cable installation on all fish and shellfish ecology receptors during the operational phase of the proposed development. The Inspectorate notes that the type and location of potential maintenance activities are not yet known. 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 Inspectorate does not agree to scope this matter out and 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. The ES should also cross reference potential effects from increases in SSCs on fish and shellfish species to the Commercial Fisheries chapter of the ES.
4.3.2	Table 15-11 and paragraph 2.6.2.1	Impacts from underwater noise (operation)	The Scoping Report proposes to scope out an assessment of impacts of mortality, injury and auditory masking as a result of underwater noise and vibration during operation. The Inspectorate notes that paragraph 2.6.2.1 of the Scoping Report outlines a number of activities which may take place as a result of routine and non-routine maintenance activities. The Inspectorate considers that some of these activities may result in underwater noise and therefore does not agree to scope this matter out. Accordingly, the ES should provide an assessment of impacts from underwater noise from maintenance activities on fish and shellfish receptors and any necessary mitigation measures including how they would be secured.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.3	Table 15-11 and 34-2	Damage and disturbance to mobile demersal and pelagic fish and shellfish species (construction)	The Scoping Report seeks to scope out an assessment of impacts on mobile demersal and pelagic fish and shellfish resulting from construction activities on the basis that even slow-moving species are likely to be mobile and thus could move away from direct damage. The Scoping Report does not include information to confirm the ability of certain species, particularly shellfish such as oyster, mussel and cockle to move out of the way of potential damage during construction. Squid and cuttlefish may also attach their eggs to substrate. The Inspectorate does not agree to scope this matter out. The ES should include an assessment of these matters. The applicant's attention is drawn to comments from the Marine Management Organisation (at appendix 2 of this Opinion) in this regard.
4.3.4	Tables 15-11 and 34-2	Impacts on fish and shellfish receptors from accidental pollution events (construction, operation and maintenance)	The Scoping Report seeks to scope out an assessment of impacts on fish and shellfish which may result from accidental spills from construction vessels. This is on the basis that the magnitude of any spill would be limited by the volume of oil or chemical required by the vessels. Measures would also be included in the outline CEMP and Operational Environmental Management Plan (OEMP) to reduce the likelihood of an incident. On the basis that measures will be provided in both the CEMP and OEMP to reduce likelihood of accidental spills, the Inspectorate agrees this matter may be scoped out of the ES.
4.3.5	Table 15-11	Impacts from permanent and/ or long-term habitat loss or alteration due to addition of infrastructure and colonisation of hard structures	The Scoping Report proposes to scope out an assessment of impacts from long term habitat loss associated with the presence of external cable protection and cable crossings on fish and shellfish which may result in removal or degradation of essential habitats and spawning areas. At this stage, the nature and extent of disturbance of seabed and loss of habitat is not fully understood. Therefore, the Inspectorate does not agree to scope this matter out. The ES should include an assessment of these matters for all phases (noting that this is scoped in for the operational phase) and temporary effects from habitat loss, for example on spawning fish species should be considered.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(construction and decommissioning)	
4.36	Tables 15-11 and 34-2 and paragraph 17.7.2.4	Increased risk of introduction and/ or spread of Invasive Non-Native Species (INNS) (all phases)	The Scoping Report seeks to scope out an assessment of the risk of spreading or introducing INNS on the basis that this can be managed through implementation of a CEMP. The applicant's attention is drawn to the responses from the Environment Agency and Natural England (at appendix 2 of this Opinion) which considers that even with a CEMP in place, there is a risk of spread of INNS. The ES should therefore assess potential impacts and include details of the mitigation measures that would be included in the CEMP and how these would be secured.
4.37	Table 15-1	Key information sources	The applicant's attention is drawn to comments from the Marine Management Organisation (at appendix 2 of this Opinion) regarding the statement in footnote 1, table 15-1 that no survey data was collected within the study area during 2017-2018 and 2018-2019 season. The Marine Management Organisation has highlighted that survey data was collected during this period. The ES should ensure that baseline data which is being relied upon is accurate to ensure a robust assessment. Accordingly, the assessment for herring should ensure the data from these surveys is included.

ID	Ref	Description	Inspectorate's comments
4.38	Table 13-13	Dredging	The Scoping Report proposes to scope in an assessment of effects from dredging activities required in the construction period. It states that disturbance from dredging may have adverse impacts on fish and shellfish but does not explain what those impacts could be. The ES should ensure that the assessment includes consideration of impacts on European eels due to dredging works. The applicant's attention is drawn to comments from the Environment Agency on this matter (at appendix 2 of this Opinion).

ID	Ref	Description	Inspectorate's comments
4.39	Table 15-2	Mitigation	The Scoping Report provides very limited and high-level detail regarding potential mitigation measures. The ES should clearly describe any mitigation measures implemented, such as seasonal restrictions for construction works, particularly with regards to spawning and nursery grounds of the fish species as outlined in table 15-2. Mitigation measures should be agreed, if possible, with relevant stakeholders and the ES should explain how measures would be secured.

4.4 Marine Mammal Ecology

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
44.1	Paragraph 16.5.2.2	White-sided dolphin, Risso's dolphin (all phases)	The Scoping Report states that the range of white-sided dolphin and Risso's dolphin does not extend as far south as the UKMS and therefore these species are not considered further. On this basis, the Inspectorate agrees that they may be scoped out of the ES.
44.2	Paragraphs 16.5.2.2, 16.5.2.12 and 16.5.2.22	Common dolphin (all phases)	The Scoping Report proposes to scope out an assessment of common dolphin on the basis that they have a limited distribution in the southern North Sea. The Inspectorate notes comments in paragraphs 16.5.2.12 and 16.5.2.22 of the Scoping Report which state that datasets included observation of unidentified dolphins, no justification is provided that these sighting could not have been of common dolphin. The Inspectorate does not agree to scope out impacts on common dolphins at this stage. The ES should provide an assessment of impacts on common dolphins as a result of the proposed development where significant effects are likely.
44.3	Paragraph 16.5.2.3	Humpback whale and fin whale (all phases)	The Scoping Report states that humpback whale and fin whale are infrequent visitors to the UKMS area and therefore are not considered further. On this basis, the Inspectorate agrees that they may be scoped out of the ES.
44.4	Paragraphs 16.5.2.6, 16.5.2.12, 16.5.2.18, and 16.5.2.22	Bottlenose dolphin (all phases)	The Scoping Report seeks to scope out impacts on bottlenose dolphin on the basis that very low numbers of bottlenose dolphin have been reported in the UKMS area. However, this appears to contradict the statement in paragraph 16.5.2.6 which states that bottlenose dolphin is one of the most commonly sighted cetaceans within the UKMS scoping boundary. Furthermore, the Inspectorates notes that paragraphs 16.5.2.12 and 16.5.2.22 state that datasets included observation of unidentified dolphins, and there is no confirmation that these were not bottlenose dolphins.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate does not agree to scope out impacts on bottlenose dolphins. The ES should provide an assessment of impacts on bottlenose dolphins as a result of the proposed development where significant effects are likely.
44.5	Tables 16-8 and 34-2	Reduction in water quality from accidental releases/ pollution on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal (construction and decommissioning)	The Scoping Report seeks to scope out an assessment of risks from accidental pollution on the basis that the risk will be mitigated through the implementation of MARPOL (International Convention for the Prevention of Pollution from Ships) compliance and a CEMP. The applicant states that these 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.
44.6	Tables 16-8 and 34-2	Temporary increase in suspended sediments from seabed activities on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal (construction and decommissioning)	The Scoping Report proposes to scope out an assessment of temporary increases in suspended sediments from seabed activities during construction and decommissioning on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal. The Inspectorate is content that significant impacts on the species identified (apart from impacts to prey resource, which is scoped in) are not likely and therefore may be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
44.7	Tables 16-8 and 34-2	Disturbance from EMF on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal (operation)	The Scoping Report seeks to scope out an assessment of impacts on the marine mammal species listed opposite as a result of EMF during operation. This is on the basis that the level of EMF emitted would not be strong enough to directly affect marine mammals. It is stated that effects on prey species from EMF will be assessed in relevant ecology chapters of the ES. The Scoping Report does not report what level of EMF will be emitted from the proposed development, nor at what range marine mammals may be affected. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment at this stage. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
44.8	Tables 16-8 and 34-2	Disturbance from thermal emissions on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal (operation)	The Scoping Report seeks to scope out an assessment of disturbance from thermal emissions on harbour porpoise, bottlenose dolphin, white-beaked dolphin, Minke whale, grey seal and harbour seal. This is on the basis that any heat generated by the underground cables would be dissipated due to the sea's high heat capacity. The Scoping Report states there is no credible indirect or direct pathways to impacts on marine mammals. On this basis, the Inspectorate agrees that this matter may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
44.9	Paragraph 16.2.2.2	Study area	The Scoping Report proposes a study area which includes a 3km buffer zone from the UKMS scoping boundary. The ES should fully explain the reasoning behind the Effective

ID	Ref	Description	Inspectorate's comments
			Deterrent Range chosen and the applicant's attention is drawn to the response from the Marine Management Organisation (at appendix 2 of this Opinion) in this regard.
44.10	Section 16.5	Baseline	The Scoping Report states that additional site-specific data will be collected for the UKMS which will supplement the information already gathered. It is not clear whether this will comprise of further desk-based information and/ or site survey work. The ES should explain how further data gained has informed the assessment on marine mammals. Details of methodology or survey work, and results should also be included. Information on any necessary mitigation measures as well as the mechanism by which they would be secured should also be provided in the ES.
44.11	Section 16.7	Mitigation	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.

4.5 Commercial Fisheries

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
4.5.2	Section 17.5.1	Baseline	When using landings data, any conservation or management measures for species captured in the vicinity of the offshore study area should be considered and acknowledged, as this may affect the species abundance and distribution within the cable route area. The applicant should make efforts to include, or otherwise account for, vessels excluded from the Vessel Monitoring Systems (VMS) data. Baseline data should also be as up to date as possible at the point of submission.
4.5.3	Paragraph 17.7.2.4	Mitigation measures – cable burial	The Scoping Report states that where cable burial to sufficient depth (minimum burial depth of 0.9m) is not possible due to crossings or installation restrictions, cable protection in the form of rock mattresses or rock placement may be deployed. The ES should include an assessment of the effects of cable protection from methods other than burial, based on the worst-case scenario which has been defined for the area of cable protection likely to be required. The applicant is encouraged to seek to agree cable burial depth and protection measures with relevant consultation bodies and stakeholders.
4.5.4	Table 17-5	Potential safety zones	The Scoping Report identified there may be temporary restrictions to access of certain areas by fishers as a result of the establishment of safety zones. The Inspectorate advises that the ES should ensure that a worst case of the extent of such zones is assessed.

4.55	Table 17-5	Temporary reduction in access to fishing grounds and temporary increased vessel traffic leading to interference with fishing activity	The Scoping Report identifies the potential for temporary reduction in access to fishing grounds and temporary increased vessel traffic leading to interference with fishing activity throughout all phases of the proposed development. The ES should clearly define the duration of temporary impacts and distinguish between true short term temporary effects and those that are longer term and reversible.
4.56	Table 17-5	Cross-referencing	The Inspectorate notes that numerous commercial fisheries impact pathways can cause or are caused by effects related to other chapters of the ES, including Shipping and Navigation; Fish and Shellfish Ecology; Socioeconomics and Land Use; Tourism and Recreation. The Commercial Fisheries impact assessment should draw upon and provide clear cross-referencing to other ES chapters where appropriate.
4.57	Section 17.8	Assumptions and limitations	The Scoping Report acknowledges assumptions and limitations with the quantitative data sets used to inform the Scoping Report and expected to inform the ES. Paragraph 17.8.1.2 notes that smaller vessels are excluded from the analysis of VMS data which only captures vessels over 12m in length, and that datasets from 2020 and 2021 will be affected by COVID-19. The applicant proposes that in order to support these existing data sets, consultation will be held with fisheries stakeholders to provide further insight into specific fishing grounds and activity of vessels in the area. The ES should clearly state the limitations associated with any data used. Efforts should be taken to agree the data sources with relevant consultation bodies and outcomes should be evidenced within the ES.
4.58	n/a	Mitigation measures – timing of works	The Scoping Report does not state whether the proposed construction and/ or operational activities are being scheduled to avoid key periods relating to commercial fishing activities. The Inspectorate advises that the applicant should consider the timing of any proposed construction and/ or operational maintenance activities as to avoid key periods relating to commercial fishing activities. Furthermore, any overlapping works should be assessed accordingly.

4.5.9	n/a	Underwater noise	The Scoping Report states at table 15-11 (Fish and Shellfish Ecology) that underwater noise and vibration as a result of construction activities has the potential to result in physical and behavioural impacts to the fish and shellfish communities within the study area. However, the Scoping Report does not discuss potential indirect impacts on commercial fisheries. The Commercial Fisheries impact assessment should draw upon and cross-reference to the findings of the fish and shellfish ecology assessment as appropriate.

4.6 Shipping and Navigation

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
461	Tables 18-4 and 34-2	Interference with marine navigational equipment due to EMF effects (construction and decommissioning)	The Scoping Report proposes to scope out an assessment of interference from subsea cables with marine navigation equipment due to EMF effects during the construction and decommissioning phases. This is on the basis that prior to the cables being energised and once the cables are de-energised there would be no interference with magnetic compasses. The Inspectorate agrees that this matter can be scoped out from an assessment for the construction and decommissioning phases.

ID	Ref	Description	Inspectorate's comments
462	Section 18.2	Study area	The Scoping Report states that the 5 Nautical Mile (nm) buffer around the scoping boundary is sufficient to characterise the relevant baseline conditions for the assessment but does not explain why. The ES should clearly justify why the final extent of the study area reflects the Zol of the proposed development and, where possible, it should be agreed with the relevant consultation bodies.
463	Paragraphs 18.4.1.1 and 18.4.1.3	Hazard workshop	The Inspectorate notes a hazard workshop will be held subsequent to the Opinion to engage marine users in the area. The ES should clearly set out the scope, outcomes and agreements reached during this meeting.
464	Section 18.7.2	Cable Burial Risk Assessment (CBRA)	The Scoping Report states that a CBRA will be prepared and implemented wherever possible. The applicant's attention is drawn to the response from the Maritime and Coastguard Agency (at appendix 2 of this Opinion) which states that in the event that cable protection is required, a reduction of 5% in the surrounding depths (with reference to Chart Datum) would usually be acceptable but is a trigger point for further discussion.

			The ES should explain how the risk of reduced under keel clearance has been addressed and identify how it would be kept within an acceptable range with supporting evidence from any discussions with the Maritime and Coastguard Agency.
4.6.5	n/a	Assessment methodology	The Maritime and Coastguard Agency have provided advice on the appropriate methodology to be used in the assessment of under keel clearance (at appendix 2 of this Opinion). The ES should explain how this methodology has been followed unless otherwise agreed with the Maritime and Coastguard Agency, in which case evidence of such agreement must be provided in the ES.

4.7 Offshore Archaeology and Cultural Heritage

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	Paragraph 19.1.1.1	Onshore scheme	The Scoping Report explains that the scoping boundary for the UKMS includes the UK landfall area and as such the landfall area is included for consideration in the offshore archaeology and cultural heritage chapter, but the rest of the onshore scheme is not. The Inspectorate agrees that this approach is reasonable and agrees that the onshore scheme can be scoped out of the ES for offshore archaeology and cultural heritage chapter.

ID	Ref	Description	Inspectorate's comments
4.7.2	Section 19.2	Study area	The study area applied for the assessment of effects on offshore archaeology and cultural ecology is set at 100m, however the Scoping Report provides limited justification. The ES should confirm why this study area is appropriate and reflects the potential ZOI anticipated as a result of the proposed development. The study area should be in accordance with relevant guidance and agreement with the relevant statutory consultation bodies.

4.8 Offshore Infrastructure and Other Sea Users

(Scoping Report Section 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	Paragraph 20.1.1.1	Onshore scheme	The Scoping Report explains that the onshore scheme is not considered in the offshore infrastructure and other sea users chapter. The Inspectorate agrees that this approach is reasonable and agrees that the onshore scheme can be scoped out of the ES for the offshore infrastructure and other sea users chapter.
4.8.2	Paragraph 20.5.2.5	Offshore wave and tidal projects	As there are no offshore wave and tidal projects located in the study area, these have been scoped out of the assessment. On the basis of justification provided in the Scoping Report, the Inspectorate agrees these may be scoped out of the ES.
4.8.3	Table 20-9 and paragraphs 20.5.2.5 and 20.5.2.14	Impacts from displacement or access or damage and disturbance to existing infrastructure from UKMS activities and vessels on: • Nuclear projects • Aquaculture projects • Carbon Capture and Storage (CCS) projects. (all phases)	The Scoping Report states that the desk top review did not identify any aquaculture sites or users and therefore proposes to scope this out of further assessment. Due to distances from the proposed development to any CCS or nuclear power plants, these have also been scoped out of further assessment. On this basis, the Inspectorate agrees that this matter may be scoped out of the ES.

4.84	Table 20-9	Impacts from indirect displacement or disturbance caused by temporary increases to sediment deposition (construction and decommissioning)	The Scoping Report seeks to scope out an assessment of impacts from indirect displacement or disturbance from temporary increases of sediment deposition from construction and decommissioning activities on the following receptors: • offshore wind farms and export cable corridor (ECC); • subsea cables; • mineral and aggregate extraction; • practice and Exercise Areas (PEXA); • nuclear projects; • aquaculture projects; and • CCS projects. For nuclear, aquaculture and CCS projects, the Scoping Report states there are no pathways for effects as there are none of these sites within the study area. The other types of projects are proposed to be scoped out as sediment deposition would not affect these types of users. On this basis, the Inspectorate agrees this matter may be scoped out of the ES.
4.85	Table 20-9	Indirect displacement or disturbance caused by increased UKMS vessel movements causing impediment to other users (all phases)	The Scoping Report seeks to scope out an assessment of impacts from increased UKMS vessel movements on nuclear projects, aquaculture and CCS. This is on the basis that there are no nuclear, aquaculture and CCS projects in the study area, therefore no pathway for effect. The Inspectorate agrees this matter may be coped out of the ES.

5. ENVIRONMENTAL ASPECT COMMENTS – UK SCHEME WIDE

5.1 Landscape and Visual Impact Assessment

(Scoping Report Section 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
51.1	Table 21.7	Impacts on landscape and seascape receptors from UKMS (construction)	The Scoping Report proposes to scope out an assessment of the impacts on landscape and seascape receptors during construction of the UKMS on the basis that construction activities are assumed to be limited to the presence and movement of offshore cable laying vessels, which are expected to be visually similar to the types of vessels routinely visible in the vicinity of the Harwich Harbour. The Inspectorate considers that the ES should provide an assessment of the potential impacts of the construction activities, including the presence and movements of associated vessels, on landscape and seascape receptors or include information to demonstrate agreement with the relevant consultation bodies and the absence of likely significant effects. The ES should set out the relevant offshore study area and baseline conditions, including a description of the seascape character, including any relevant designations. Consideration should also be given to the potential cumulative effects of offshore construction activities on relevant landscape and seascape receptors.
51.2	Table 21.7	Impacts on visual receptors from UKMS (construction)	The Scoping Report proposes to scope an assessment of visual impacts during construction of the UKMS on the basis that construction activities are assumed to be limited to the presence and movement of offshore cable laying vehicles. The Inspectorate considers that the ES should provide an assessment of the potential impacts of construction activities, including the presence and movements of associated vessels, on visual receptors, such as recreational vessels. The ES should consider the potential cumulative visual effects of offshore construction activities on receptors and cross reference to the shipping and navigation ES chapter, where appropriate.

5.13	Table 21.7	Impacts on landscape, seascape and visual receptors from UKMS (operation)	The applicant proposes to scope these matters out on the basis that there would be no permanent structures above the sea surface during operation and vessel movements associated with monitoring and maintenance works would be occasional. The Inspectorate agrees that operation of the UKMS is unlikely to result in significant effects on landscape, seascape and visual receptors and is content for this matter to be scoped out of further assessment.
5.14	Table 21.7	Impacts on landscape, seascape and visual receptors from UKMS (decommissioning)	The Scoping Report states that decommissioning activities are anticipated to be similar in scope to construction and proposes to scope out these matters from further assessment. On this basis, the Inspectorate considers that the ES should provide an assessment of the potential impacts of the decommissioning activities, including the presence and movements of associated vessels, on landscape, seascape and visual receptors or include information to demonstrate agreement with the relevant consultation bodies and the absence of likely significant effects.
5.15	Table 21.7	Impacts on landscape and visual receptors from EOS (operation)	The Scoping Report states that operational impacts on landscape and visual receptors are proposed to be scoped out as the only above ground infrastructure associated with the operational phase of the landfall and onshore cable routes would be a series of manhole covers set at or just above ground level and low-level marker posts and any maintenance activities would be small scale and limited to discrete areas. The Inspectorate agrees that in general the introduction of the landfall and onshore cable is unlikely to give rise to significant long-term effects on landscape and visual receptors during operation of the proposed development. However, it is unclear whether any easement required would result in permanent landscape and visual changes and the potential for such effects should be considered. The ES should assess the potential for significant short-term effects during the beginning of the operational phase, as proposed reinstatement measures mature along the cable route.
5.16	Table 21.7	Impacts on landscape and visual receptors from EOS (decommissioning)	The Scoping Report seeks to scope out impacts from decommissioning of the landfall and onshore cable route on the basis that decommissioning activities would be small scale and limited to discrete areas.

			The Inspectorate notes this matter is scoped in for the construction phase and paragraph 2.7.1.1 of the Scoping Report states that decommissioning would generally be the reverse of the construction. However, 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. The ES should provide an assessment of this matter or include information to demonstrate agreement with the relevant consultation bodies and the absence of likely significant effects.
51.7	Table 21.7	Landscape and visual effects beyond study area from EOS (all phases)	The Scoping Report proposes to scope out impacts on landscape and visual receptors beyond the study area as this is considered sufficient to capture any likely significant effects. The Inspectorate notes that the final Zone of Theoretical Visibility (ZTV) and location for the onshore converter station, which could be 26m in height, have not yet been defined. On this basis, the Inspectorate considers that the ES should provide an assessment of the potential landscape and visual impacts on receptors beyond the study area or include information to demonstrate agreement with the relevant consultation bodies and the absence of likely significant effects. The applicant should seek to agree the study area with relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
51.8	Section 21.2	Study area	The Scoping Report states that an initial study area for the onshore cables extends 500m around the scoping boundary and 5km around the search area for the converter station site. Paragraph 21.2.1.5 states that landscape and visual effects beyond this distance are not likely to be significant based on intervening distance and characteristics of the receiving landscape, including landform, buildings and vegetation. The final study area would be reviewed following refinement of the proposed development's order limits. The ES should justify the study area used based on the worst-case scenario(s). In determining the final study area, the applicant should consider the results of the proposed ZTV and make effort to agree it with relevant consultation bodies.
51.9	Paragraph 21.5.1.20	Viewpoints	Table 21-2 sets out the potential viewpoint locations identified to inform the Scoping Report. The Inspectorate advises that efforts should be made to agree the number and location of viewpoints with relevant consultation bodies, including the host local

	and table 21-2		authorities. The ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided. The ES should include a plan to illustrate the location of viewpoints in relation to the proposed development. Consideration should be given to the production of night-time visualisations to support the assessment of effects from lighting requirements.
5.1.10	n/a	Visual amenity receptors	It is not clear if offshore receptors or users of waterways have been identified as visual receptors in the assessment. The ES should either assess effects on users of the waterways, such as the River Stour, or provide a justification as to why they would not experience significant effects. Efforts should be made to agree the location of appropriate waterways visual receptors with the local authorities.

5.2 Noise and Vibration

(Scoping Report Section 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
521	Table 22-10	Vibration from construction traffic	The Scoping Report proposes to scope out an assessment of vibration from construction traffic on buildings adjacent to public roads where surface conditions or proximity allow transmission. This is on the basis that public highways are assumed to be maintained and free of significant irregularities and would therefore not lead to significant effects. The Inspectorate notes that construction vehicle routes are currently unknown and therefore so is the distance to sensitive receptors. In addition, the number and type of vehicles have not yet been confirmed. In the absence of information such as the anticipated number, type and frequency of construction vehicles and clear agreement with relevant statutory bodies the Inspectorate is not in a position to agree to scope this matter out at this stage. 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.
522	Table 22-10	Operational road traffic noise	The applicant proposes to scope out an assessment of operational road traffic noise, on the basis that operational traffic flows are expected to be low. With reference to ID 6.6.1 of this Opinion, the Inspectorate agrees to scope this matter out subject to confirmation of vehicle types and number of movements required during operation of the proposed development in the ES.
523	Table 22-10	Operational vibration	The Scoping Report proposes to scope out an assessment of operational vibration from fixed infrastructure, such as the converter station. This is on the basis that any operational vibration is anticipated to be low-level and would be appropriately controlled to ensure vibration is maintained within levels prescribed in the Control of Vibration at Work Regulations.

			The Inspectorate does not agree to scope this matter out given the uncertainties regarding the chosen location of the converter station and the proximity to sensitive receptors. The ES should provide an assessment of operational vibration or the information demonstrating agreement with relevant stakeholders and the absence of likely significant effects.
524	Table 22-10, 23-9 and paragraph 22.1.1.4	Noise and vibration effects from marine and offshore elements (all phases)	The Inspectorate notes that the noise and vibration assessment would include impacts from the EOS but not offshore noise from the UKMS, except in the cumulative assessment. This is on the basis that the applicant proposes to consider offshore noise within the Benthic and Intertidal Ecology; Fish and Shellfish Ecology; and Marine Mammal Ecology chapters. The Inspectorate also notes that above water noise from the UKMS on offshore ornithology receptors will be considered within the temporary disturbance and displacement impact pathway. The Inspectorate is content for this matter to be scoped out of the onshore noise and vibration assessment, provided offshore noise is addressed within the relevant offshore aspect chapters. The ES should provide clear cross-referencing to where the relevant impacts are considered.

ID	Ref	Description	Inspectorate's comments
525	Paragraphs 22.1.2.1 to 22.1.2.4	Study area	The Scoping Report states that the study area for the onshore assessment of noise and vibration is based on the EOS scoping boundary. The Inspectorate notes that the study area will be further refined in the ES. The ES should include figure(s) to illustrate the final study area(s) adopted for the noise and vibration assessment and include the sensitive receptors within the defined study area. Effort should be made to agree the study area and approach to the assessment with relevant consultation bodies.
526	Paragraphs 22.4.2.4 and 22.4.2.7	Baseline vibration conditions	The Scoping Report states that a baseline noise survey will be undertaken to establish baseline conditions, but a separate baseline vibration survey is not proposed on the basis that construction and decommissioning vibration would be assessed against relevant absolute criteria for human response and building damage rather than by reference to existing baseline vibration levels. Effort should be made to agree the method of establishing the baseline, with relevant consultation bodies. The ES should include evidence of agreement or otherwise regarding the approach.

527	Paragraph 22.5.2.7	Mitigation	The Scoping Report refers to potential noise mitigation measures which include screenings. The ES should address the potential adverse effects of mitigation measures in the relevant aspect chapters of the ES (e.g. Landscape and Visual) where significant effects are likely to occur.

5.3 Ornithology

(Scoping Report Section 23)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
53.1	Tables 23-8 and 23-9	Temporary disturbance and displacement of red-throated diver from UKMS (all phases)	The Scoping Report proposes to scope out an assessment of temporary disturbance and displacement from vessel activity on red-throated diver within the UKMS scoping boundary, during all stages of the proposed development. This is on the basis that although increased vessel presence may cause short-term disturbance and displacement to red-throated diver from key foraging areas, the implementation of a specific Vessel Management Plan (VMS) for red-throated diver and seasonal restrictions will mitigate this effect. The Inspectorate is not in a position to scope this matter out of the assessment. The applicant's attention is drawn to comments from the Joint Nature Conservation Committee and Natural England (at appendix 2 of this Opinion) regarding this matter. Accordingly, the ES should include an assessment of this matter and clearly set out how implementation of the VMP for red-throated diver would be secured through the dDCO.
53.2	Table 23-9	Accidental pollution, inclusive of indirect effects from UK scheme (all phases)	The applicant proposes to scope out an assessment of accidental pollution on all offshore ornithology receptors from general use of plant, vessels and equipment associated with the UKMS and EOS. This is on the basis that although pollution incidents could directly harm birds or reduce prey availability, the applicant will implement a CEMP minimising the risk and any potential effects for the UKMS are anticipated to be localised, short-term and not significant. The Inspectorate does not agree to scope this matter out at this stage. The ES should include an assessment of this matter and clearly set out mitigation measures proposed within the outline management plans, including the CEMP to address impacts and explain how its delivery is assured with reference to relevant documents.
53.3	Table 23-9	All potential impacts from EOS on green-listed species of	The Scoping Report proposes to scope out an assessment of impacts from the EOS on green-listed species of conservation concern, which are not listed on Schedule 1 or Annex I, on the basis that these species are common and widespread and given the nature of the

		conservation concern (all phases)	proposed development, there is no potential for significant effects. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope out this matter from further assessment. The ES should provide an assessment of this matter, or information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.
534	Table 23-9	All potential impacts from EOS on nightjar and woodlark (all phases)	The applicant proposes to scope out an assessment of impacts from the EOS on nightjar and woodlark on the basis that although these are features of designated sites within 20km of the proposed development, the applicant has not identified them within the EOS scoping boundary during scoping surveys and considers it unlikely that there will be any connectivity between these sites and the EOS. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope out impacts from the EOS on nightjar or woodlark from the assessment. Accordingly, the ES should include an assessment of this matter, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.

ID	Ref	Description	Inspectorate's comments
535	Paragraphs 23.4.1.9 to 23.4.1.39	Ornithological surveys	The Inspectorate notes that the applicant's approach to surveys are set out in the Scoping Report. Effort should be made to agree the method of establishing the baseline, including the requirement for site specific surveys, with relevant consultation bodies including Natural England. The ES should include evidence of agreement or otherwise regarding the approach. The applicant's attention is drawn to comments from Natural England (at appendix 2 of this Opinion) regarding this matter.
536	Section 23.5.3	Assessment methodology – onshore ornithology	The Inspectorate notes the applicant's intention is to align the assessment approach to onshore ornithology with guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) 2024. The ES should clearly set out the methodologies used to explain any departure from the proposed approach where professional judgement is applied. Outputs from other assessments should be clearly explained where these have been applied. Where significance criteria are not explicitly

			defined within the guidance, the ES should clearly set out where deviation from guidance has occurred and professional judgement has been applied.
53.7	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.

5.4 Socio-economics and Land Use

(Scoping Report Section 24)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
54.1	Table 24-6	Indirect/ wider economic effects (operation)	The Scoping Report proposes to scope out an assessment of operational employment and supply chain effects generated from the EOS on the basis that impacts are likely to be very limited and therefore only have a small effect on Gross Value Added (GVA). The Inspectorate is content for this matter to be scoped out on this basis.
54.2	Table 24-6	Impacts on the agricultural economy (operation)	The Scoping Report proposes to scope these matters out on the basis that temporary disruption to agricultural and commercial activity during construction would cease during operation once the onshore cable infrastructure is buried. While infrequent maintenance activities and on-site inspections may be required during operation, the Inspectorate agrees that significant effects are unlikely and is therefore content for this matter to be scoped out of further assessment.
54.3	Table 24-6	Impacts on businesses (operation)	The applicant proposes to scope out an assessment of impacts on the viability of business and development land from land use or environmental change. This is on the basis that the onshore infrastructure would be buried and would not disrupt commercial activity. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the assessment.
54.4	Table 24-6	Impacts on the capacity of public services (Operation)	The Scoping Report proposes to scope out an assessment of changes in the capacity of public services from the EOS operational workforce, on the basis that the operational workforce would be limited and remotely based, and maintenance activity would be intermittent, resulting in negligible additional demand for public services and community facilities. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments

54.5	Paragraphs 24.2.1.1 to 24.2.1.12	Study areas	The Inspectorate notes the need to utilise a number of study areas within this aspect chapter. The applicant proposes to use a 500m buffer around the EOS as the local study area, however this distance has not been justified. Effort should be made to agree the final study area(s) with relevant consultation bodies, including the host local authorities. The ES should report the level of agreement or otherwise.
54.6	Table 24-2	Lawford Green and Play Area	The applicant's attention is drawn to comments from Essex County Council (at appendix 2 of this Opinion) who recommend that Lawford Green and Play Area is included in the assessment as a community facility.

5.5 Health and Wellbeing

(Scoping Report Section 25)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
55.1	Table 25-7	Effects on human health and wellbeing linked to vibration (operation)	The Scoping Report proposes to scope this matter out on the basis that operation of the proposed development would not generate perceptible levels of ground-borne vibration. The Inspectorate agrees that vibration during operation of the proposed development is unlikely to lead to significant effects on human health and wellbeing and is content to scope this matter out of further assessment.
55.2	Table 25-7	Impacts on local community services and facilities (operation)	The applicant proposes to scope out an assessment of impacts on access to and capacity of local community services and facilities during operation on the basis that the scale of non-local operational employment is likely to be limited. The Inspectorate agrees that the impact of operational employment on local community services and facilities is unlikely to result in significant effects on human health and wellbeing and is content for this matter to be scoped out of further assessment.
55.3	Table 25-7	Changes in social cohesion and community identity from traffic and transport impacts (operation)	The Scoping Report seeks to scope out this matter on the basis that no PRowS, road links or junctions are anticipated to be impacted during the operational phase. The Inspectorate agrees that operational impacts on traffic and transport are unlikely to result in significant changes in social cohesion and community identity and is content for this matter to be scoped out of further assessment.
55.4	Table 25-7	Impacts on employment training and business activity (operation)	The Scoping Report proposes to scope out this matter as employment during operation is likely to be limited to a small number of operational and maintenance personnel and there are unlikely to be effects on existing commercial activity, land uses or the wider agricultural economy. The Inspectorate agrees that impacts on employment training and business activity during operation of the proposed development are unlikely to result in significant on human health and wellbeing and is content for this matter to be scoped out of further assessment.

555	Table 25-7	Effects on human health and wellbeing linked to the effects of EMFs	The Scoping Report proposes to scope out an assessment of health and wellbeing effects associated with the generation of EMFs on the basis that the proposed development would ensure that policies and procedures are in place at the design phase to ensure that all equipment will comply with public EMF exposure limits. Provided the ES can demonstrate that all electrical infrastructure will remain below negligible levels in line with the International Commission Non-Ionising Radiation Protection (ICNIRP) guidelines (2020), the Inspectorate is content to scope out the potential for EMF effects on human health from further assessment.
556	Table 25-7	Effects on human health and wellbeing linked to land and water contamination (all phases)	The applicant proposes to scope out effects on human health and wellbeing linked to land and water contamination during all project phases. This is on the basis that any potential impacts during construction and decommissioning would be mitigated by measures in the outline CEMP and DEMP and any operational impacts are not likely as there would be no pathway for effects once construction is complete. However, as stated in above (ID 3.1.1) paragraph 7.5.10.7 of the Scoping Report identifies potential risks to ground conditions and contamination during operation of the proposed development. The Inspectorate does not agree to scope this matter out at this stage. The ES should include an assessment of this matter and clearly set out mitigation measures proposed within the outline management plans, including the CEMP and DEMP to address impacts and explain how its delivery is assured with reference to relevant documents or provide evidence, demonstrating agreement with relevant consultation bodies, and the absence of likely significant effects..

ID	Ref	Description	Inspectorate's comments
557	Paragraph 25.2.1.3	Study area	The Scoping Report states that the health and wellbeing study area may be influenced by the geographic extent of the relevant technical chapters. It is unclear how the study area for the health and wellbeing assessment is consistent with the study areas for other topic chapters such as traffic, air quality or noise and this should be explained in the ES, taking into account the study areas identified for inter-related aspects.

55.8	n/a	Offshore human health and wellbeing effects	The Scoping Report does not make reference to any potential human health effects resulting from the offshore elements of the proposed development. The ES should provide a description of the potential impacts from the construction, operation and decommissioning of the UKMS on human health and wellbeing and provide an assessment of the likely significant effects.

5.6 Materials and Waste

(Scoping Report Section 26)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
56.1	Paragraph 26.7.2.6 and table 26-12	Use of materials	The applicant proposes to scope out this matter on the basis that the proposed development would require less than 10% of the regional availability of material resources (national availability for steel), therefore no significant effects are expected. The Inspectorate agrees that the proposed development is unlikely to lead to significant effects on materials and is content to scope this matter out. However, the ES should provide a description of the expected type and quantity of natural resource(s) required to construct and operate the entire proposed development, including the converter station, onshore and offshore cables. The ES should also set out an estimate of the water resource requirements.
56.2	Table 26-12	Production and disposal of waste (operation)	The Scoping Report proposes to scope out potential effects arising from operational waste on the basis that the operational and maintenance phase of the proposed development will generate limited amounts of waste. The Inspectorate agrees that waste generation during operation is unlikely to result in significant effects and is content to scope this matters out of the ES.

ID	Ref	Description	Inspectorate's comments
56.3	n/a	Waste arising from construction and decommissioning of UKMS	The Scoping Report does not make reference to any potential waste impacts resulting from the offshore elements of the proposed development. The ES should provide a description of the potential waste streams from the construction and decommissioning of the UKMS, such as from seabed preparation or dredging and provide an assessment of the likely significant effects.

5.7 Tourism and Recreation

(Scoping Report Section 27)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
57.1	Table 27-9	Changes to the capacity and availability of tourist accommodation (operation)	The Scoping Report proposes to scope out an assessment of changes to the capacity and availability of tourist accommodation during operation, on the basis that there will be a limited operational and maintenance workforce. The Inspectorate agrees that this matter can be scoped out of the assessment, subject to confirmation of anticipated operational staffing levels across the UKMS and the EOS.
57.2	Table 27-9	Permanent amenity effects on onshore and offshore tourism and recreation receptors (operation)	The Scoping Report proposes to scope out an assessment of changes to employment in the tourist sector and tourism patterns due to temporary and permanent land take on the basis that maintenance activities and associated operational disturbance would be limited. However, this appears inconsistent with the justification for scoping in effects during construction and decommissioning, where the Scoping Report acknowledges that amenity effects due to changes in air quality, noise, seascape, landscape and visual amenity, and traffic and transport may arise from the operation of the scheme. The applicant's attention is drawn to comments from Essex County Council (at appendix 2 of this Opinion) in this regard. Based on the information provided within the Scoping Report, the Inspectorate is not in a position to agree to scope this matter out at this stage. 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.

ID	Ref	Description	Inspectorate's comments
57.3	Paragraphs 27.2.1.5	Study area	The Scoping Report proposes to use a study area for offshore recreational activities of a 100m buffer from the UKMS scoping boundary and a study area of 5nm for offshore recreational vessel activities. The ES should include figure(s) to illustrate the final study areas adopted for the tourism and recreation assessment and include the

	and 27.2.1.6		sensitive receptors within the defined study areas. Effort should be made to agree the study area and approach to the assessment with relevant consultation bodies.

5.8 Air Quality

(Scoping Report Section 28)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
58.1	Table 28-11 and paragraphs 28.7.3.5 to 28.7.3.7	Emissions from vessels from UKMS (construction)	The Scoping Report proposes to scope out an assessment of emissions from construction vessels on the basis that construction of the UKMS will require far fewer than 5,000 large vessel movements per year, which is well below Defra guidance screening criteria used to identify situations where vessel emissions may pose a risk to public health. The Inspectorate agrees that this matter may be scoped out of further assessment in the ES.
58.2	Table 28-11 and paragraph 28.7.3.10	Emissions from traffic movements (operation)	The Scoping Report proposes to scope out an assessment of emissions from operational traffic movements on the basis that operational traffic movements are anticipated to be below the Institute of Air Quality Management and Environmental Protection UK (2017) guidance screening criteria, and that impacts are therefore not considered to be significant. The Inspectorate agrees to scope this matter out subject to confirmation of vehicle types and number of movements required during operation of the proposed development in the ES, with reference to relevant thresholds. The applicant's attention is drawn to comments from Essex County Council (at appendix 2 of this Opinion) in this regard.
58.3	Table 28-11 and paragraph 28.7.3.14	Dust deposition (operation)	The applicant proposes to scope out an assessment of dust deposition resulting from maintenance activities from the EOS. This is on the basis that maintenance activities are likely to be small-scale, localised and unlikely to generate material quantities of dust, that best practice mitigation measures would also be employed to manage any potential emissions. Therefore significant effects are unlikely. The Inspectorate agrees that, on this basis, this matter can be scoped out of further assessment in the ES.
58.4	Table 28-11 and paragraph 28.7.3.15	Emissions from vessels (operation)	The Scoping Report proposes to scope out an assessment of emissions from operational and maintenance vessels on the basis that any emissions would be limited in scale and duration, and that vessels would comply with modern emissions regulations, therefore significant effects are unlikely. The Inspectorate agrees that this matter may be scoped out of further assessment in the ES subject to confirmation of

			vessel types and numbers required during operation and maintenance of the proposed development within the ES.
585	Table 28-11 and paragraphs 28.7.3.16 and 28.7.3.17	Emissions from vehicles and vessels (decommissioning)	The Scoping Report proposes to scope out an assessment of emissions from traffic and vessels during decommissioning on the basis that although precise details are not currently known, any impacts would be similar to, or less than, those arising during construction. Decommissioning phase site emissions will also be mitigated through the use of standard best practice mitigation measures. The Inspectorate agrees that dust emissions associated with operation and maintenance and decommissioning of the proposed development are unlikely to result in significant effects, and this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
586	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.
587	Paragraphs 28.2.1.1 to 28.2.1.9	Study areas	The ES should include figures to identify the final study areas for each element of the air quality assessment, including the location of human and ecological receptors that have been considered. The Scoping Reports sets out the various guidance that will inform the study areas for the assessment of construction site emissions and construction phase road traffic emissions, but further confirmation is needed on the final identified study areas for the UKMS and EOS elements. Efforts should be made to agree the study areas with the relevant consultation bodies.
588	Paragraph 28.2.1.8	Ecological Receptors	The Scoping Report acknowledges that ecological sites may be impacted by construction traffic emissions, but provides limited information on the ecological receptors that may be affected. The sensitivity of ecological receptors to air quality emissions should be clearly defined, and the ES should clearly explain any assumptions made in determining the potential for likely significant effects on such receptors. The applicant's attention is drawn to comments from Natural England (at appendix 2 of this Opinion), which emphasise the need for considering air quality impacts on nearby designated sites.

			The air quality assessment within the ES should cross-refer to the findings of other relevant ES assessments, such as onshore biodiversity and ornithology chapters, to avoid duplication.
58.9	n/a	Emissions generated from Non-Road Mobile Machinery (NRMM)	The ES should clarify whether emissions from NRMM during the construction, decommissioning and/ or operation of the proposed development would meet the required EU emission standards. The applicant's attention is drawn to the comments of Essex County Council and the Environment Agency (at appendix 2 of this Opinion).

5.9 Carbon and Climate Change

(Scoping Report Section 29)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
59.1	Table 29-12	GHG emissions – land purchase and associated fees/ advice for the UK scheme (pre-construction)	The Scoping Report proposes to scope out an assessment of emissions associated with land purchase and associated fees/ advice for the UK scheme such as energy use and transportation demands from preliminary studies and work, including onshore and offshore field studies. This is on the basis that these emissions would mainly cover short transportation distances involving small amounts of equipment and would therefore be negligible. The Inspectorate agrees that this matter is unlikely to result in significant effects and agrees it can be scoped out of further assessment.
59.2	Table 29-12	GHG emissions from the net loss of carbon sinks (all phases)	The Scoping Report proposes to scope out an assessment of GHG emissions from the net loss of carbon sinks due to land use change as the emissions are assumed to be negligible. The Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
59.3	Table 29-12	GHG emissions associated with the fabric of products and materials (operation)	The applicant proposes to scope out an assessment of GHG emissions associated with the fabric of products and materials during the operational phase of the proposed development. This is on the basis that emissions are assumed to be negligible as little new material is required during operation. The Inspectorate agrees on that basis that this matter can be scoped out of further assessment in the ES.
59.4	Table 29-12	GHG emissions associated with the refurbishment of the UK scheme (operation)	The Scoping Report states that the UK scheme is not expected to undergo refurbishment during its lifetime therefore emissions assumed to be negligible. The Inspectorate agrees on that basis that this matter can be scoped out of further assessment in the ES.

59.5	Table 29-12	GHG emissions from the provision of potable water and the treatment of wastewater (operation)	The Scoping Report proposes to scope out an assessment of GHG emissions from the provision of potable water and the treatment of wastewater during the operational phase of the proposed development, on the basis that emissions are assumed to be negligible. The Inspectorate agrees that significant effects are not likely to occur and that this matter can be scoped out of the assessment. However, the ES should include confirmation of the predicted energy and water demand during operation.
59.6	Table 29-12	Other operational processes (operation)	The Scoping Report states that other GHG emissions associated with the operation of the UK scheme, not covered by the other sections, such as management of operational waste are scoped out of the ES. This is on the basis that all expected emissions are already covered by other sections, therefore no emissions are expected to fall under this category. The Inspectorate agrees that this category can be scoped out of the assessment provided expected emissions are covered in other sections.
59.7	Table 29-12	User utilisation of infrastructure (operation)	The Scoping Report seeks to scope out an assessment of GHG emissions associated with user's utilisation of the UK scheme during operation. This is on the basis that no emissions are expected, as no third parties will use the infrastructure, but rather use the product (electricity). The Inspectorate agrees this matter can be scoped out of the ES.
59.8	Paragraph 29.7.4.3	Cumulative effects in the GHG assessment (all phases)	The Scoping Report states that cumulative effects will be scoped out of the GHG assessment, on the basis that GHG emissions are globally mixed pollutants, and cumulative effects are not considered meaningful at the UK scheme level, in line with guidance. The Inspectorate is in agreement with this approach provided that overall emissions are considered.

ID	Ref	Description	Inspectorate's comments
59.9	Section 29.6	Assessment methodology	The Inspectorate notes the references in the Scoping Report to professional guidance including the Institute of Environmental Management and Assessment's (IEMA) 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022) and IEMA's 'Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation' (IEMA, 2020).

			The ES should set out the methodologies used to explain any departure from the proposed approach where professional judgement is applied. Outputs from other assessments should be clearly explained where these have been applied. Where significance criteria are not explicitly defined within the guidance, the ES should clearly set out where deviation from guidance has occurred and professional judgement has been applied.
59.10	Figure 29-2 and paragraph 29.6.3.4	Future baseline for the Climate Change Risk Assessment (CCRA)	The Scoping Report states that multiple (751, 758, 766, 765 and 774) 12km coastal/marine cells based on the UKCP18 probabilistic projections will be considered in the CCRA in the ES, however figure 29-2 only makes it clear that cell 751 will be considered. Figure 29-2 should illustrate which of the coastal cells have been assessed.

5.10 Risk of Major Accidents and Disasters

(Scoping Report Section 30)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
5.10.1	Tables 30-5 and 30-6	Vulnerability of the proposed development to major accidents or disasters (excluding sabotage by external parties)	The Scoping Report proposes to scope out an assessment of the vulnerability of the proposed development to major accidents or disasters on the basis that all potential hazards, excluding malicious attacks: sabotage by external parties, can be mitigated or reduced by processes and standards in place. The justification for scoping out each potential major event type is provided in table 30-5 of the scoping report. The Scoping Report also states that where certain major accidents and hazards have been identified as potentially resulting in significant effects these are captured and scoped into assessments within the specific environmental aspect chapters. The Inspectorate has considered this approach and agrees that an assessment of vulnerability of the proposed development to major accidents and disasters can be scoped out, aside from matters relating to sabotage by external parties. Each ES chapter should clearly state where it has captured potential major accidents and disasters within the relevant technical assessments.
5.10.2	Tables 30-5 and 30-6	Potential for the proposed development to exacerbate existing hazards	The Scoping Report states that the proposed development is unlikely to generate any potential significant effects on the environment if a major accident or disaster were to occur and proposes to scope this matter out of further assessment. The justification for scoping out each potential major event type is provided in table 30-5 of the Scoping Report. Based on the justification and evidence presented in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment. Each ES chapter should clearly state where it has captured potential major accidents and disasters within the relevant technical assessments. Any design measures taken to avoid major accidents and disasters should be clearly described within the ES and demonstrably secured in the dDCO. This should include any proposed measures to manage fire risk during operation of the proposed onshore converter station, such as fire-fighting and containment measures.

ID	Ref	Description	Inspectorate's comments
5.10.3	Section 30.5.2	Mitigation	The ES should include a clear description of mitigation measures required and how they will be secured, including whether this is through other consents and licences in addition to the dDCO. A summary of the other consents and licences required to regulate the proposed development, the aspects that they cover, and application status, should be included in the ES.

5.11 Other Environmental Topics

(Scoping Report Section 31)

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
5.11.1	Section 31.2	Telecommunications, radio and television reception and onshore utilities (all phases)	The Scoping Report proposes to scope out an assessment of telecommunications, radio and television reception and onshore utilities. This is on the basis that there are limited impact pathways, which would be mitigated through scheme design and standard construction controls such as installing cables underground and at a sufficient distance from telecommunications infrastructure, cable sheathing and burial, utilities searches, ground-penetrating radar, consultation with undertakers and adherence to industry best practice. The Inspectorate agrees that based on the information provided in the Scoping Report the potential for significant effects is unlikely and therefore the Inspectorate is content that this aspect can be scoped out of the ES.
5.11.2	Section 31.3	Heat and electromagnetic fields (EMF) (all phases)	The Scoping Report states that a standalone chapter on heat and EMF is not proposed for the ES on the basis that potential effects from EMF on human health receptors would be assessed within the Health and Wellbeing chapter and potential EMF effects on marine ecological receptors would be assessed within the Fish and Shellfish Ecology and Marine Mammal Ecology chapters and no additional receptors beyond these have been identified. The Inspectorate notes the EMF effects on human health and wellbeing are scoped out of the ES (ID 5.5.5). The Inspectorate notes that EMF effects on fish and shellfish and marine mammals will be considered in the ES within the relevant aspect chapters. On this basis the Inspectorate is content that a standalone chapter is not required. Accordingly, the ES should include an assessment of these matters within the Fish and Shellfish Ecology and Marine Mammal Ecology chapters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of an LSE. The applicant's attention is drawn to comments from the Environment Agency (at appendix 2 of this Opinion) regarding the need to consider potential thermal impacts to shallow

			groundwater across all phases of the EOS. Accordingly, this matter should be assessed within the relevant the ES chapter.
5.11.3	Section 31.4	Aviation and radar (all phases)	The Scoping Report proposes to scope out a standalone chapter on aviation and radar, on the basis that the UKMS will be beyond restricted airspace and thus have no potential for significant effects on aviation or radar. Effects from the EOS on aviation and radar are also proposed to be scoped out on the basis that the EOS is outside of the confines of the safeguarded areas of navigational aids and the safeguarding areas for Meteorological Office Radar; the converter station is unlikely to cause interference to airport PSR or NATS en-route or Air Defence Radar Systems due to terrain shielding; and low flying will be highly unlikely to take place above the UK scheme. The Inspectorate notes that although discussions with the owners and operators of the Great Oakley Airfield are ongoing to design the EOS in a way that eliminates any direct impacts on the airfield and its operation, the applicant does not expect any significant effects to occur. The applicant's attention is directed to the comments of the Ministry of Defence in appendix 2 of this Opinion regarding the requirement to scope in an assessment of potential impacts of the development on the East WAM network; Low Flying Areas 5 and 10; and PEXA areas X5118 and X5121. The Inspectorate notes that the impact of the proposed development on PEXA has been scoped into the assessment within the offshore infrastructure and other sea users chapter. On this basis, an assessment of impacts on the receptors raised by the Ministry of Defence above should be included within the ES, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE is presented 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 councils	Frinton and Walton Town Council
	Thorpe-le-Soken Parish Council
	Great Oakley Parish Council
	Great Bentley Parish Council
	East Bergholt Parish Council
	Stutton Parish Council
	Harkstead Parish Council
	Brantham Parish Council
	Elmstead Parish Council
	Great Bromley Parish Council
	Ardleigh Parish Council
	Mistley Parish Council
	Lawford Parish Council
	Tendring Parish Council
	Beaumont-cum-Moze Parish Council
	Bradfield Parish Council
	Wix Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Ramsey and Parkeston Parish Council
	Little Oakley Parish Council
	Frating Parish Council
	Little Bentley Parish Council
	Little Bromley Parish Council
	Wrabness Parish Council
	Harwich Town Council
	Manningtree Town Council
	Dedham Parish Council
The Environment Agency	Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission - East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	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	The Maritime and Coastguard Agency - Thames & East England
Trinity House	Trinity House
The relevant Highways Authority	Essex Highways
	National Highways
The Civil Aviation Authority	Civil Aviation Authority

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Essex Police
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Essex County 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 Suffolk and North East Essex Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Dock and Harbour authority	Harwich Haven Authority

STATUTORY UNDERTAKER	ORGANISATION
Lighthouse	Trinity House
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
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Affinity Water
	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	East Anglia One Limited
	East Anglia Two Limited
	East Anglia One North Limited
	East Anglia Three Limited
	Five Estuaries Offshore Windfarm Limited
	Galloper Wind Farm Limited
	North Falls Offshore Wind Farm Limited
	Greater Gabbard Offshore Winds Limited
	Norfolk Vanguard East Limited
	Norfolk Boreas Limited
The relevant electricity distributor with CPO Powers	Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	Diamond Transmission Partners Galloper Limited
	Greater Gabbard OFTO Plc
	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)
The relevant electricity interconnector with CPO Powers	National Grid Lion Link Ltd
	National Grid North Sea Link Limited
	National Grid Electricity Transmission Plc - Sea Link

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

LOCAL AUTHORITY
Thurrock Council
London Borough of Havering
Enfield Council
Waltham Forest Council
London Borough of Redbridge
Medway Council
Southend-on-Sea City Council
Cambridgeshire County Council
Suffolk County Council
Essex County Council
Hertfordshire County Council
Tendring District Council
Colchester Borough Council
Babergh District 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
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:
Anglian Water
Ardleigh Parish Council
Babergh District Council
Cambridgeshire County Council
East Anglia Three Limited
East Anglia Two Limited
East Anglia One North Limited
East Anglia One Limited
Enfield Council
Environment Agency
Essex County Council
Five Estuaries Offshore Windfarm Limited
Forestry Commission - East & East Midlands
Frinton and Walton Town Council
Galloper Wind Farm Limited
Health and Safety Executive
Historic England
Joint Nature Conservation Committee
Little Bromley Parish Council
Marine Management Organisation (MMO)
Maritime & Coastguard Agency
Ministry of Defence (MOD)

National Grid Electricity Transmission Plc
National Highways
NATS En-Route Safeguarding
Natural England
Royal Mail Group
Suffolk County Council
Tendring District Council
Trinity House
United Kingdom Health Security Agency

██████████
Senior Environmental Advisor
The Planning Inspectorate
By email: tarchoninterconnector@planninginspectorate.gov.uk

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Your Ref: EN0210009

Our ref: Tarchon Interconnector
Project/Scoping

1st May 2026

Dear ████████,

**TARCHON INTERCONNECTOR PROJECT - EIA SCOPING NOTIFICATION AND CONSULTATION -
ANGLIAN WATER RESPONSE**

Thank you for the opportunity to comment on the scoping report for the Tarchon Interconnector Project.

The following response is submitted on behalf of Anglian Water Services (AWS) in our statutory capacity regarding water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface drainage.

The scoping boundary shown in figure 1-4 in the Environmental Impact Assessment Scoping Report Volume 01, runs through the local authority area of Tendring in which AWS is the appointed sewerage undertaker. Water for this area is supplied by Affinity Water Ltd (AWL).

AWS works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements E.g. Overarching National Policy Statement for Energy (EN-1) (January 2025) and (EN-5) (December 2025) and 2024 IAQM guidance¹⁵. AWS would expect the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will manage its wastewater; how water recycling assets serving residents and businesses in the area will be protected; and how design has been altered to reduce the need for new infrastructure or the diversion of existing assets. This is relevant for the construction, operation and de-commissioning stages (as applicable).

AWS will work with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers and wastewater 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 AWS and the developer have reached agreement on the approach to assets and connections in advance of the submission of the draft Development Consent Order (DCO) for examination.

The Project and Anglian Water Infrastructure

It is understood; the proposed development includes the construction, operation, and maintenance of high voltage cabling to facilitate a direct power link between the UK and Germany to connect the two countries' energy markets and increase the security and reliability of energy supply. The cable is to be buried along the entire route from the proposed landfall location between the south of Harwich and north of Hamford Water, with the exact location yet to be determined. The offshore cables will connect with underground cables via a Transition Joint Bay (Inspection chamber). In addition, there will be a fenced compound to house a converter station above ground to convert the transmitted electricity (Chapter 2 – Para 2.4.6).

AWS supports the need for the proposed EIA to ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case' scenario, so that the assessment of likely significant effects is robust. AWS welcomes the use of the 'Rochdale Envelope' approach to address the flexibility of design (Chapter 2 - Para 2.2.1.1). It is acknowledged due to the early stages of design and development of the project the precise locations of landing points, underground cable corridors and converter station locations are still being explored and therefore final locations and route alignments have yet to be confirmed. This is to allow for the consideration of ongoing engineering development, changes arising from environmental surveys and assessment and engagement feedback for input into the final design.

AWS notes the Scoping Report identifies there will be instances whereby the project interacts with the existing utilities infrastructure. AWS would therefore expect the next stages of the project (including the EIA) to include reference to any existing infrastructure managed and owned by AWS, and any provision of replacement infrastructure or requirements for new infrastructure. AWS' own programme of projects for AMP8 (2025-30) should be included within the list of cumulative projects to be assessed in the EIA.

Our Business Plan [Our Plan 2025 to 2030 - PR24](#) references record investment and obligation during this next AMP period (2025-30) and through an ambitious Water Industry National Environment Programme (WINEP) as agreed with the Environment Agency as the environmental regulator. This response will address the standard matters which AWS would comment on as the appointed sewerage undertaker.

General Comments

There are existing AWS assets both above and below ground, which serve the surrounding businesses and communities. These include Water Recycling Centres (WRC) and sewer pumping stations. There are several rising mains; and sewers within the project area within the highway or its verges which link to various settlements such as Harwich, Ramsey and Great Bromley. In addition, AWS have a final effluent pipe that extends offshore SE of Upper Dovercourt.

AWS notes a land investigation questionnaire has been completed by us. For any further information relating to the completed land investigation questionnaire, including details of above-ground assets and formal easements, contact should be made with the AWS Estates Team on: awsestates@savills.com.

AWS welcomes pre-construction surveys across the entirety of the route; to include ground investigations, drainage studies and environmental constraints to enable pre- and post-construction detailed design and inform any necessary mitigation measures. AWS also notes the applicant's commitment to the risk assessment of route preparation around third party assets. (Chapter 2 – Para 2.4.2.13).

To reduce the need for diversions and the associated carbon impacts of associated works, AWS' assets should be identified and mapped to establish interactions with the project with a view to designing the project to avoid impacts upon those assets. Where the project is likely to have a number of interfaces with our underground assets, we advise applicants to contact AWS to discuss provision of further technical/design assessments for clash detection, identification of potential diversions, and asset protection measures. AWS requires that the location and nature of our assets serving local communities have been identified and protected, during construction and operation of the project. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the project if any specific issues are identified at an early stage.

We recommend that the locations of our assets are initially identified from a desktop study of <http://www.digdat.co.uk/> to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

In addition, we strongly recommend the applicant progresses with clash detection and asset assessment to be undertaken by AWS at the earliest opportunity and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the presence of some AWS projects being delivered in AMP8, there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the project.

Our National Infrastructure team is responsible for identifying AWS assets in relation to the DCO process. Early engagement is critical to ensure accurate assets data is captured and to avoid potential delays later in the project's lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if any revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the project can include:

- Clash detection and resolution.

- Early design and technical assurance.
- Asset protection and diversion planning.
- Coordination with Anglian Water investment schemes (current and planned).
- Review of red line boundary implications.

The applicant will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with AWS around project scope, timescales, and other key details will ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward.

Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the project and AWS assets or projects, and will be dependent on project size, complexity and requirement from the project. Typically, this includes input from both AWS Services and our delivery teams.

This process will also help to inform mitigation measures in the Construction Best Practice for underground cabling, as well as any other environmental and traffic management plans. AWS will need to be a consultee set out in the Requirements of the DCO for the approval of these detailed management plans.

The project should seek to assess whether there are any diversion requirements, the appropriate method of pipeline installation and suitable mitigation of thermal dispersion and contamination impacts from the construction and operation of underground cables, particularly around Source Protection Zones.

AWS considers that where there are interfaces between the project and AWS assets, a bespoke Protective Provisions for the protection of AWS assets will be required and included within the draft DCO. As a starting point, AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes where construction works are undertaken – including where the cable is underground; Converter Station Sites; and Transition Joint Bays.

This information is extracted from our Protective Provisions template - copy attached.

- (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 pipe exceeds 400 millimetres.

Groundwater abstraction points and source protection zones.

Source Protection Zones

It is noted that the scoping report identifies that a part of the scoping area is within source protection zone (SPZ) 3 to the west of Wix associated with AWS water abstraction. It is noted the project area is not located within a drinking water safeguard zone for surface water and groundwater.

The western section of the proposed route options around Little Bromley are partially within SPZ3 and pass through SPZ2 and SPZ3. AWS has an abstraction point which is situated to the west and just outside of the project area, at Ardleigh reservoir. Ardleigh Reservoir is a shared resource between AWS and AWL and overseen by the joint Ardleigh Reservoir Committee. AWL, the water provider for the area, should be contacted to seek further details of any abstraction areas within the project area.

Although, AWS do not control any water abstraction points within the project area, AWS would recommend groundwater protection measures to be implemented to protect principal aquifers used for drinking water abstraction using hydrogeological risk assessments to ascertain the risk to controlled waters (groundwater) in these areas. This is to ensure that any downstream contamination is avoided from the construction, operation and decommission of the cabling. AWS would request to be further consulted, ideally via stakeholder liaison meetings, once route options and proposals are fully understood. It is not considered that risk to groundwater should be scoped out at this stage, given the proposed pipeline route option through SPZ 3.

Any proposed dewatering activities should be addressed through the Environment Agency's National Permitting Service, in terms of granting licenses, while ensuring sufficiency of groundwater resources for abstractors and the environment.

Ground Conditions and Land Contamination

There is an AWS abstraction point and corresponding SPZ (3) as detailed above. AWS acknowledge that the scoping report identifies in Chapter 7 that a hydrological assessment has been completed to scope the potential impacts on groundwater water. Table 7-7 has scoped out the potential impacts on groundwater.

Underground electrical cables present a risk to raw water sources, through either leakage (dependent on the type of cable), trenching activities may disturb the aquifer and lead to contamination of groundwater and/or construction activities (including trenching) may lead to runoff of contaminated water into waterbodies, potentially reaching our surface water reservoirs.

Therefore, AWS remain concerned that any construction works to the west of the project area could adversely impact on this zone and water quality and do not agree that this should be scoped out at this stage.

AWS therefore would therefore expect impacts and mitigation measures to be identified and implemented within the Construction Environment Management Plan (CEMP) to ensure AWS assets are not adversely affected in terms of quality or quantity or structural integrity by the proposed development. This should include measures to mitigate effects from spills from the storage of fuel, chemicals and materials, and mobilisation of existing ground contamination. AWS would seek to ensure that appropriate measures are included to reduce risk of contamination that may impact abstraction for public water supply and minimise risk of damaging our water supply and sewerage assets which may present pollution risks to the local environment. We request further information regarding proposed groundworks, in particular deep excavations near AWS assets, for our review and that a meeting take place to discuss.

Subsequently, AWS may need to be a consultee set out in the Requirements of the DCO for the approval of detailed management plans covering these aspects.

Water Management

AWS seeks clarification on the following matters:

- If water recycling/ sewerage services are required from AWS (all stages).
- Whether the management of surface water will require a public sewer connection.

AWS requests that these points are fully assessed and confirmed in the EIA. Further advice is provided below.

Water recycling/ sewerage services

AWS would seek to understand how wastewater from the project including during construction; ongoing operation and de-commissioning are intended to be managed. As part of a drainage strategy, details of how wastewater is intended to be disposed of, such as a connection to an available public sewer, will need to be confirmed at all project stages within the EIA. It is noted in Chapter 8 (para 8.7.3.5) of the Scoping Report connection to the public sewer is assumed for the foul drainage from the temporary compounds, however an alternative solution of cesspits or sealed tanks has also been proposed. Para 8.7.3.5 also states that there are no proposed new abstractions or discharges of foul wastewater to surface or groundwater. A Water Resource Assessment is required to provide further detail on foul water disposal and if connection to AWS assets is required.

We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our [InFlow | Development Services](#) platform, so that connections can be appropriately planned for.

Water Resources and Water Supply

The project lies outside the Water Resource Zones (WRZ) of AWS and is within the Brett WRZ and water supply is managed by AWL. It is noted in Chapter 8 (para 8.8.1.10) that water supply will be required for construction and the future operation of the above ground facilities.

The Anglian Water and Affinity Water regions are identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. AWS notes the requirement of water supply for the construction and operation of the project. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan [Regional Plan](#) which sets out the collective water companies position in the East of England.

As water will be used in the project, impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

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 EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of the chapter on Water Environment.

For applications under the 2008 Act, the WRA should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for wastewater connections. The team can take you through the Inflow registration process [InFlow | Development Services](#), the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the EIA.

Flooding and Surface Water Drainage

AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems and welcomes the completion of a Flood Risk Assessment (FRA) and Water Framework Directive (WFD) Assessment, and a Surface Water Management Plan (SWMP) to inform the impacts in the Hydrology, Hydrogeology and Flood risk associated with the project.

Our advice on surface water management is available here: [aws-surface-water-guide-sm.pdf](#) Potential embedded design measures should include 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.

AWS will not accommodate any surface water run-off into a foul sewer. 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.

AWS welcome the preparation of an FRA to assess the risk of flooding to the onshore elements of the project from known/identified sources (i.e. tidal, fluvial, surface water, groundwater, sewer and artificial sources) as detailed in Chapter 8 (para 8.6.6.4).

The FRA 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. 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.

Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the FRA, given the interfaces between the project and AWS assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.

Subject to confirmation that all surface water will be managed following the drainage hierarchy, including SuDS, AWS 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.

We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the flood risk management roles of the Lead Local Flood Authority and the Environment Agency, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

We would encourage any pre-planning enquiries are made through our InFlow platform to ascertain the most appropriate solution is taken forward.

Scope of Environmental Impacts and Effects

Whilst most of the land within the draft order limits is agricultural there are interfaces with some of our sewer pipes that operate under pressure. The Scoping Report identifies sources of flooding in terms of fluvial, pluvial, tidal and groundwater flooding events, storm events, and damage to utilities. AWS welcomes the identification of flooding from sewers but further detail regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the Flood Risk Assessment; given the interfaces between the project and AWS assets.

These interfaces should be managed through the Protective Provisions for AWS and agreed construction practices in the CEMP. Horizontal direct drilling (HDD) or micro tunnelling will need to take account of rising mains (pressurised sewer) to avoid pollution risk to protected habitats.

Approach to Cumulative Effects

AWS welcomes the use of a Cumulative Effects Assessment (CEA) as part of the EIA process to assess the inter relationships and combined effects of the project with other developments on the same single receptor or resource detailed in Chapters 6 and 32. AWS recognises that cumulative schemes

are generally based on existing and/or approved development, given that the information is readily available from local authority planning registers or the Planning Inspectorate website.

Management Plans

The outline Construction Environmental Management Plan (CEMP) to be prepared as referenced under Chapter 2 (para 2.4.4.5) of the scoping report, should include mitigation measures required to safeguard and remove the risk of damage to AWS's assets, both below ground and above, from plant and machinery interference (compaction and vibration during the construction phase) including haul and access roads. Chapter 22 (para 5.3.2) identifies ground-borne vibration generated by construction plant, site preparation works, cable installation activities could result in significant adverse effects at nearby noise and vibration-sensitive receptors. Para 22.5.3.3 states a detailed assessment is to be reported in the ES Chapter and will confirm the magnitude of residual effects and identify any additional mitigation where necessary. AWS welcomes this approach as the impact of traffic vibration on underground water/sewer mains is not identified sufficiently within the scoping report. This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures to be addressed in the various construction, traffic and noise/ vibration management plans to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets.

Further advice on minimising and then relocating (where feasible) AWS existing assets can be obtained from: connections@anglianwater.co.uk

Major accidents and disasters:

AWS welcomes Chapter 30 which addresses the likely significant effects (LSE) of Major Accidents and Disasters. AWS identifies that the site is crossed by several utilities, including easement and separation distances required to be maintained. AWS would welcome specific reference on how the interfaces with utility assets such as sewers within the Order Limits will be managed through the construction of haul roads, bellmouths etc. Whilst Protective Provisions should address those interfaces with our assets, we would welcome further discussion with the applicant regarding such matters and their inclusion in the final versions of the DCO documents.

These documents should include steps to remove the risk of damage to our assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. AWS would seek to safeguard 24 hours /7-day access to our assets, and this is not compromised. We would, therefore, welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents. AWS would welcome engagement in relation to AWS assets, as we consider, until the clash assessment has been undertaken by AWS; the likelihood and magnitude of any impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Engagement and Next Steps

AWS are a statutory consultee and the sewerage undertaker for the area defined by the scoping boundary. Chapter 4 (para 4.2.2.1) refers to the consultation discussions that have already taken place with statutory and non-statutory consultees. AWS would welcome structured engagement with the Applicant throughout the forthcoming stages of the project, to address and resolve issues prior to the submission of the DCO, including Protective Provisions, in line with the requirements of the 2008 Planning Act and guidance.

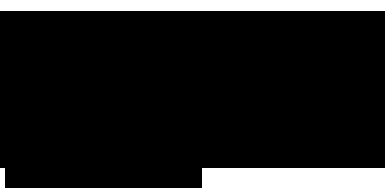
Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination.

Consultation at the statutory pre application stage would in our view be too late to inform design and may result in objections and delays to the project, including potential requests to change the project's Order Limits, to ensure services to existing customers and future growth are not prejudiced. The preparation of a Statement of Common Ground (SoCG) 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.

AWS seeks to engage further with the Applicant through the forthcoming phases to discuss, amongst other matters:

- Impact of the development on AWS water treatment and recycling assets.
- The design of the project to minimise interaction with AWS existing and planned assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
- Requirement for water recycling connections (if any).
- Confirmation on the appropriate design/ mitigation of proposed works in the vicinity of groundwater abstraction points and corresponding source protection zones (3).
- Draft Protective Provisions and Requirements.
- The preparation of a draft SoCG prior to submission.

Please do not hesitate to contact me on these aspects so they can be progressed during the pre-application to decision stages of the project, or should you require clarification on the above response.



Strategic and Spatial Planning Lead – Sustainable Growth

Ardleigh Parish Council response EN0210009 - Tarchon Interconnector Project - EIA Scoping and Consultation

Introduction

Tarchon is a proposed electricity interconnector between Essex, in East Anglia, United Kingdom, and Nieder Langen, in Lower Saxony, Germany.

Within England and UK waters, the Tarchon Interconnector Project comprises the construction, operation and maintenance of an onshore Converter Station, onshore High Voltage Alternating Current (HVAC) cabling; onshore and subsea High Voltage Direct Current (HVDC) cabling; and associated infrastructure.

The Converter Station will convert electricity from HVAC to HVDC and vice versa to allow for export and import and transfer of electricity to the National Electricity Transmission System (NETS). Approximately 5km of underground HVAC cabling will be installed to connect the proposed Converter Station to the NETS at the proposed East Anglia Connection Node (EACN) Substation, east of Ardleigh in Essex.

Approximately 15km of HVDC underground cabling will be installed to connect the Converter Station to a landfall site, located along the coastline, south of Harwich, Essex, where a transition joint bay will be sited for the transition of onshore cables and subsea cables. Approximately 230km (124 nautical miles) of new HVDC subsea cabling will be installed in UK waters.

NSP status: *“Having considered the details of the Applicant’s proposals as set out in their letter of 28 February 2025 the Secretary of State concludes that the Proposed Project is nationally significant.*

Tarchon is being treated as a separate project to the National Grid Norwich to Tilbury project and yet it contributes significantly to the overall negative cumulative effect of siting the EACN in the ALBA.

Ardleigh Parish Council submits this response to the Tarchon Interconnector scoping submission with particular concern for the cumulative impacts on Ardleigh and neighbouring Little Bromley.

This response is based on a review of:

- sections 2-5 focus on the impact of the Tarchon project.
- Section 6 onward consider the combined cumulative impact of all four projects that converge in the same small rural area:
 - EACN (National Grid): Ardleigh/Little Bromley (ALBA) / Lawford area
 - North Falls substation: adjacent to EACN
 - Five Estuaries substation: adjacent to EACN
 - Tarchon converter station: within 5 km of EACN, refined search centred on Little Bromley

The Parish Council’s principal concern with Tarchon is that the proposal, as currently presented, is insufficiently defined, yet clearly of a scale that could result in significant and potentially unacceptable harm to the local area particularly when combined with the other projects.

1 Lack of Defined Site Location

The consultation confirms that:

1. The converter station site has not been fixed
2. Instead, a 5 km area of search has been identified
3. A refined search area for the converter station and HVAC route is centred around Little Bromley, extending close to Ardleigh

The consultation maps clearly show that:

- Little Bromley lies within the refined search area
- Ardleigh lies immediately adjacent to this area and within the wider 5 km search zone

This approach creates a situation where:

- Residents and stakeholders do not know where the main infrastructure will be located
- The most affected receptors cannot be identified with certainty
- The Parish Council are being asked to respond to a non-specific and movable proposal

2 Scale of Development

Despite the lack of a fixed location, the documentation confirms a very substantial infrastructure project, including:

- A converter station platform of approximately 7.5 hectares
- A temporary construction area of up to 10 hectares
- Buildings up to 26 metres in height
- Lightning masts up to 30 metres

In addition:

- Up to 25 km of onshore cable routes
- Construction corridors up to 40 metres wide
- Extensive temporary works, compounds, and access arrangements

Taken together, this represents:

Another large-scale industrial development within a predominantly rural and agricultural landscape.

3 Uncertainty and the “Rochdale Envelope”

The project is being advanced using a maximum design envelope approach, meaning:

- The final design may vary within broad parameters
- The ultimate location, layout, and land-take remain uncertain

While this may be procedurally acceptable, it has serious implications:

- The worst-case scenario must be considered, not an illustrative scheme
- The current consultation does not allow proper assessment of cumulative impacts at village level

- The approach places undue burden on affected communities to respond without sufficient information

4 Cumulative Effects

The consultation maps confirm that the Tarchon Interconnector has not yet identified a fixed converter station site or final onshore alignment. Instead, the developer is consulting on a broad 5 km converter-station search area and a separate refined area of search for a converter station site and HVAC cable route, together with indicative cable corridors and a landfall zone. The effect is that communities are being asked to respond to a moving target rather than a clearly defined proposal.

(See Appendix A)

This lack of precision is especially serious for Little Bromley, which appears on the consultation maps within the refined search area itself, and for Ardleigh, which lies immediately adjacent to that refined area and within the wider 5 km converter-station search area. The maps therefore show that both villages are plainly within the zone of likely effect, but neither community is given the certainty of a fixed site, fixed alignment, or fixed land requirement.

That uncertainty is not a minor drafting issue. It prevents proper assessment of the true effects on homes, farmland, local roads, landscape, drainage, heritage setting, and cumulative village character. Residents and local councils cannot meaningfully test the acceptability of the project while the developer retains such broad discretion over where this intrusive infrastructure may ultimately be placed.

Accordingly, no weight should be given to any suggestion that the impacts are limited, localised, or manageable until the applicant provides a fixed converter-station site, fixed cable alignments, quantified land-take, and village-specific assessment for Ardleigh and Little Bromley. On the developer's own consultation mapping, both communities are close enough to be materially affected, yet the proposal remains too uncertain for a fair and informed planning judgment.

The project must not be considered in isolation.

The documentation indicates that multiple environmental topics will be assessed, including:

- Land use and agriculture
- Water environment and drainage
- Biodiversity
- Traffic and transport
- Cultural heritage

However, the Parish Council are concerned that:

The combined and cumulative effects on Ardleigh and Little Bromley are not yet clearly assessed or presented.

Potential cumulative harms include:

- Loss and fragmentation of agricultural land
- Disruption to drainage and water systems
- Increased traffic on rural roads
- Erosion of landscape character
- Long-term pressure from multiple infrastructure projects in the area

5 Combined cumulative impact assessment

(Tarchon + Norwich–Tilbury (EACN) + North Falls + Five Estuaries)

5.1 Geographic reality

All four projects converge in the same small rural area (See Appendix B):

- EACN (National Grid): Ardleigh/Little Bromley / Lawford area
- North Falls substation: adjacent to EACN
- Five Estuaries substation: adjacent to EACN
- Tarchon converter station: within 5 km of EACN, refined search centred on Little Bromley

This is not coincidence — it is a planned energy hub concentration.

5.2 Combined Maximum Design Scenario (MDS)

Fixed infrastructure (current worst case)

Project	Max footprint	Height	Notes
EACN	~12.65 ha ~47 ha (order limits)	~15 m+	Central hub
North Falls	~5.9 ha	~18 m	Adjacent
Five Estuaries	~4.5–5.9 ha	~15 m	Adjacent
Tarchon	~7.5 ha (+10 ha temp)	~26 m	Within 5 km

Combined permanent footprint (core sites only):

~30–32 hectares of substations / converter infrastructure

Including EACN order limits:

~60–80+ hectares potentially affected

5.3 Additional cumulative infrastructure

Beyond the sites themselves:

- Up to 25 km HVDC cable (Tarchon)
- Up to 5 km HVAC cable (Tarchon)
- Up to 5km HVAC cable (Ardleigh EACN)
- 21 pylons (up to 6km) in the Parish of Ardleigh
- 180km pylons (Norwich to Tilbury)
- Multiple (Ardleigh/ Little Bromley ALBA):
 - Haul roads
 - Access roads
 - Construction compounds
 - Drainage systems

Result:

A networked industrial landscape, not isolated projects

5.4 Cumulative impacts on Ardleigh & Little Bromley

Landscape & visual impact

- Multiple substations + pylons + converter station
- Heights up to:
 - 30 m (Tarchon)
 - ~50 m pylons
- Loss of rural skyline

Effect:

Permanent industrialisation of countryside

Land use & agriculture

- The land take is BMV land predominantly grade 1 with some grade 2 & 3
- 30+ hectares of permanent infrastructure
- 100+ hectares temporary disturbance (combined works)
- Fragmentation of fields

Effect:

Long-term degradation of agricultural viability

Traffic & construction

- Simultaneous construction phases likely over 5+ years
- Heavy goods vehicle (HGV) movements on:
 - Narrow rural roads
 - Village routes

Effect:

Sustained disruption over multiple years

Drainage & water environment

- Large impermeable surfaces
- Extensive trenching
- Altered drainage patterns

Effect:

Flood risk and groundwater disruption

Ecological fragmentation

- Hedgerow removal
- Corridor severance
- Habitat loss

Effect:

Breakdown of rural ecological networks

Cumulative “energy hub” effect

This area becomes one of the largest electricity infrastructure nodes in the UK

- National Grid hub (EACN)
- Two offshore wind substations
- One international interconnector converter station

Effect:

Strategic industrialisation of a rural parish landscape

6 Objections

6.1 Over-concentration of infrastructure

The Parish Council objects strongly to the unprecedented concentration of major energy infrastructure proposed within the Ardleigh and Little Bromley area.

The Norwich to Tilbury project establishes the East Anglia Connection Node (EACN) as a large new 400 kV substation hub. This is then compounded by the proposed North Falls and Five Estuaries offshore windfarm substations, both of which are to be located adjacent to, and dependent upon, the EACN.

The Tarchon Interconnector further intensifies this concentration by proposing a converter station within a 5 km radius of the same node, with consultation material indicating a refined search area centred on Little Bromley.

Taken together, these projects would result in the co-location of:

- A major National Grid transmission hub
- Two large offshore wind substations
- An HVDC interconnector converter station

This represents a level of infrastructure concentration wholly out of scale with the rural character of the area.

6.2 Health & Safety Concerns

Fires, Terrorism, Accident etc –

The Parish Councils understand from Tarchon representatives that the reason for not using the same landfall site and cable-corridor as the FE and NF projects across Tendring is the cumulative risk of terrorism/sabotage. However, all projects converge at the EACN at Little Bromley which would seem to result in an even larger potential target, with Little Bromley becoming the potential victim of any ensuing explosion, fire or other related catastrophe.

The Tendring Peninsula is the sunniest and driest place in the UK and with tinder-dry crops and stubble fields for many months of the year, fire is always a hazard. Crop and stubble fires spread extremely quickly with "wildfires" becoming increasingly common in the UK - so any proposals must consider these issues and the impact/increased risk that construction and siting of electricity infrastructure will pose for local communities.

6.3 Cumulative Maximum Design Scenarios

Each project is being promoted using a Maximum Design Scenario (MDS) approach.

While this is procedurally acceptable, it has critical implications:

- Each scheme must be assessed at its maximum realistic size
- When combined, these maximum scenarios produce a worst-case cumulative impact far greater than any single project

Based on the applicants' own parameters, the combined effect includes:

- Over 30 hectares of permanent substation and converter infrastructure
- A broader land envelope exceeding 60–80 hectares
- Buildings and structures up to 30 metres high
- Extensive cable corridors, pylons, compounds, and access works

This cumulative maximum scenario has not been adequately assessed at a village level.

6.4 Failure to assess cumulative impact

The Parish Council are particularly concerned that:

- Each project is being assessed in isolation
- There is no integrated assessment of combined effects on:
 - Ardleigh
 - Little Bromley
 - Other neighbouring Parishes

This is a fundamental flaw.

The planning system requires assessment of the combined effect of concurrent major infrastructure projects, not a piecemeal approach.

Appendices A, B and C show the locations of the three projects including Pylon and cable routes the only way to appreciate the cumulative effect of these four projects would be to combine the four projects onto one map. Appendix D Produced by National Grid at the request of the Norwich to Tilbury ExA shows the EACN and the two windfarm substation but fails to show the wider context of cumulative effect of the four projects on ALBA.

6.5 Conclusion of objection

The Parish Council considers that:

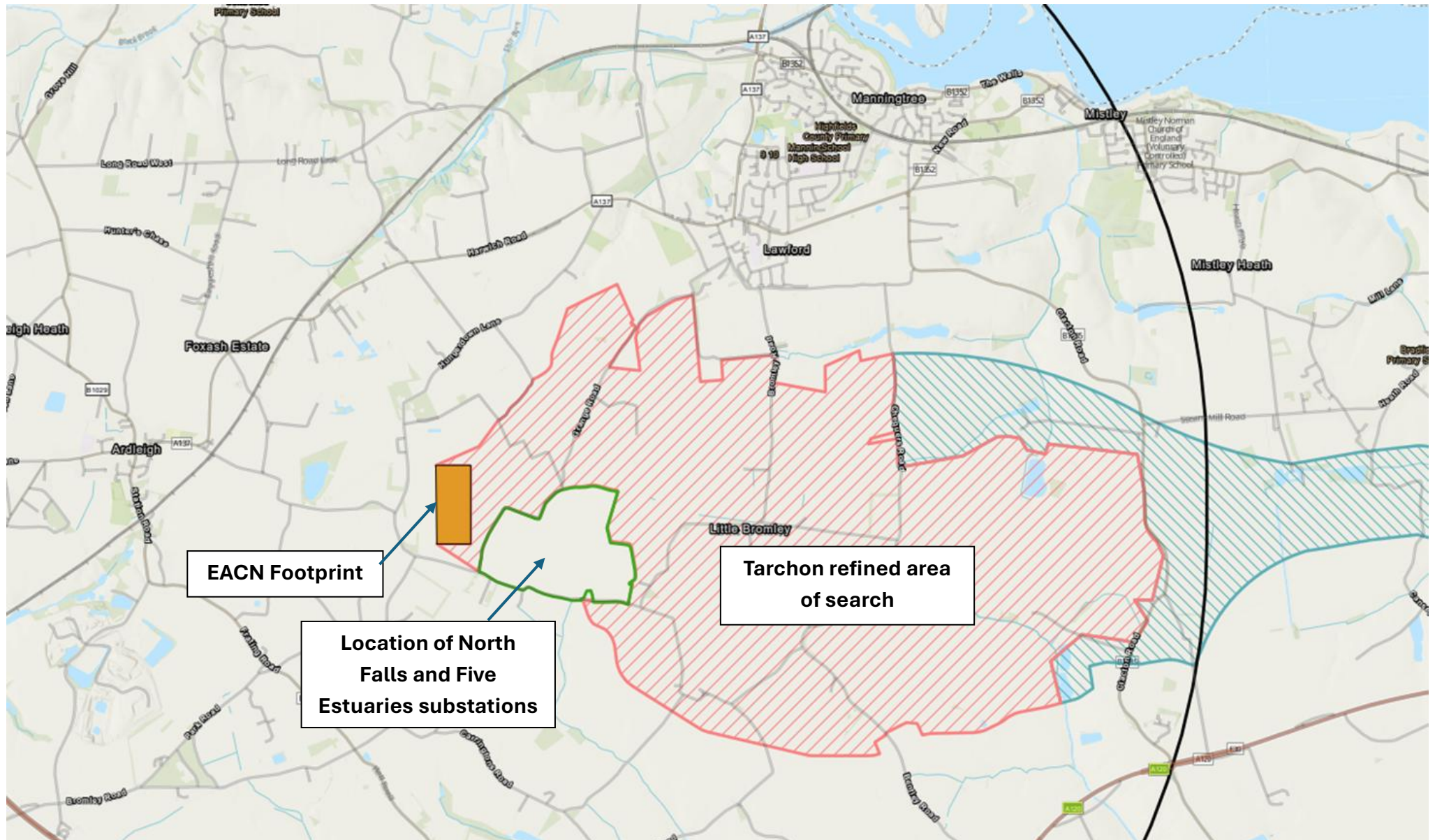
The combined effect of these four projects represents an over-concentration of nationally significant infrastructure in a single rural locality, resulting in unacceptable cumulative harm.

Until a full, integrated cumulative assessment is undertaken, including maximum design scenarios across all projects, the proposals must be strongly resisted.

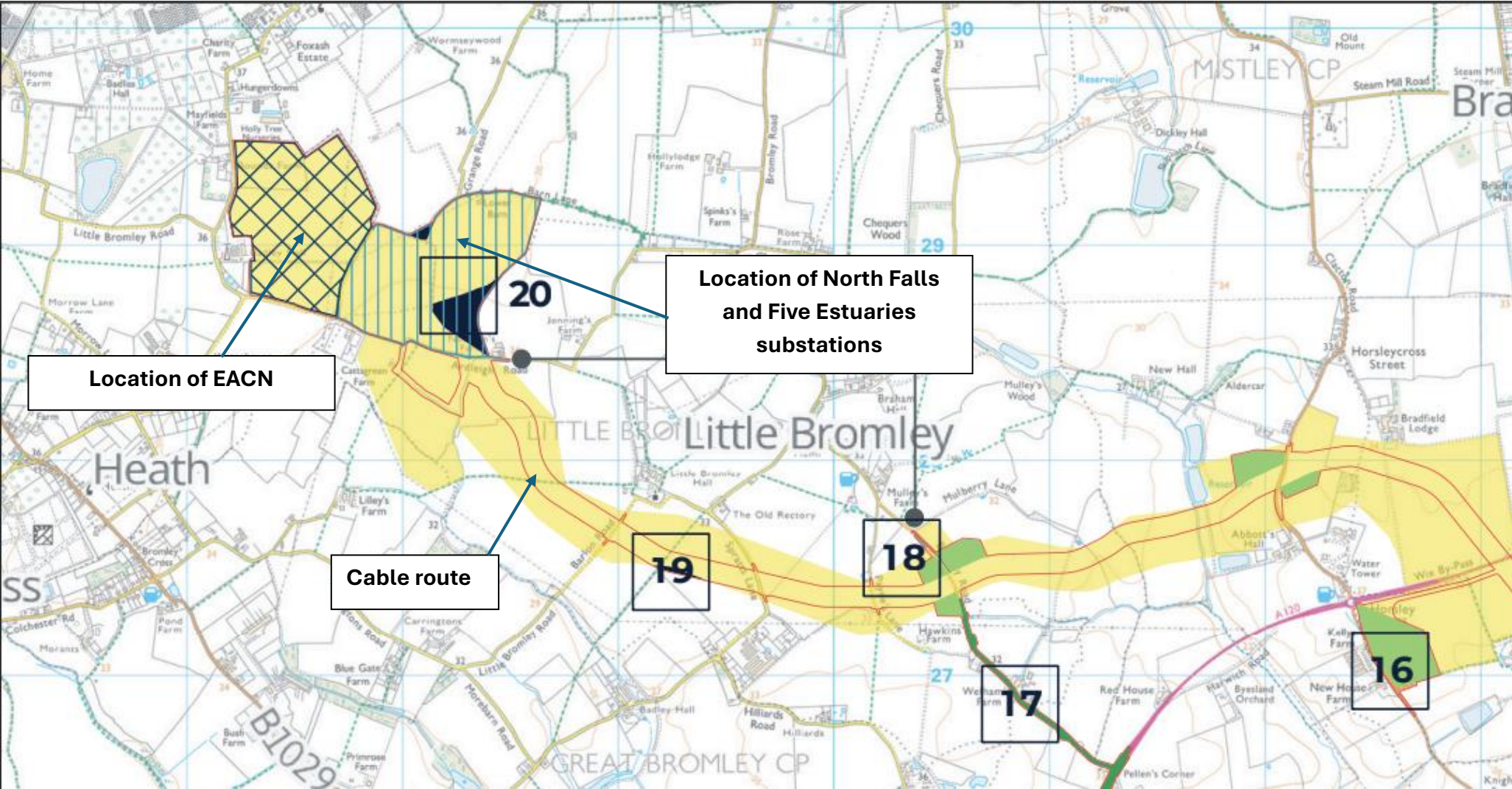
These are not four separate projects, but a single, cumulative energy super-hub being created in a rural parish area

Note: This has been partially produced by AI drawing on documents produced by the four projects.

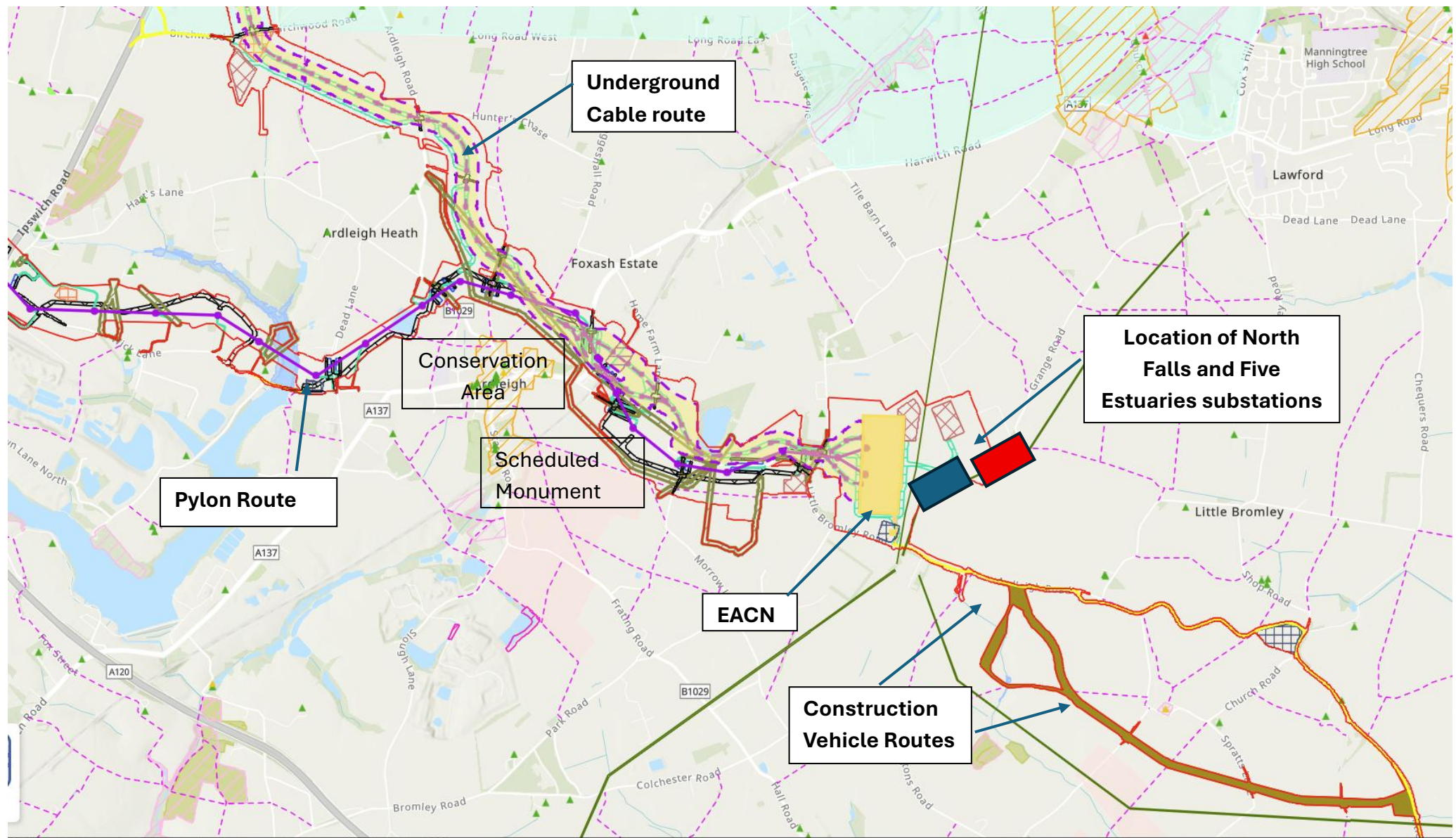
Appendix A Map showing the Tarchon refined search area and the proximity to the windfarm substations and the EACN



Appendix B Shows the location of the windfarm substations and the cable route



Appendix C Shows Three substations, underground cable route and the pylon route. Note the size of the Substation sites in comparison to the Ardleigh Conservation area and the proximity of the Scheduled Monument to the cable and Pylon routes.



11





May 2026

The Planning Inspectorate by email

INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS, 2017: TARCHON INTERCONNECTOR SCOPING REPORT

This document sets out the joint response of Babergh District Council and Mid Suffolk District Council (BMSDC, 'The Councils') to the Scoping Report consultation received 8th April 2026 in respect of the proposed Tarchon Interconnector NSIP.

In commenting upon the content of the Scoping Report BMSDC recognise the early stage of the project and the limitations of the report in respect of the indicative siting and layout.

These comments are therefore not exhaustive and BMSDC reserve the right to provide additional comments later in the engagement process.

It should also be noted any comments made here do not infer agreement with or acceptance of any or all of the supporting documents referred to in the Scoping Report.

Introduction

BMSDC are part of the Suffolk Climate Change Partnership (SCCP) and declared a climate emergency in 2019. This proposal is one of many energy development projects coming forward in the region, providing energy security and other benefits. The councils acknowledge the national importance of strategic energy infrastructure and have previously stated a preference for a coordinated, offshore approach to the delivery of transmission reinforcement, import and export objectives including consolidation of offshore connections and onshore infrastructure together with appropriate management of construction activities.

The councils are concerned about the potential for significant effects from these developments, alone and in combination, on communities, businesses, landscapes, biodiversity, heritage and agriculture.

Project description

The description of the proposal is generally acceptable.



Babergh and Mid Suffolk District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

EIA approach and method

BMSDC have concerns that the recent proliferation of large-scale projects within the region and the expectation of further delivery of sites, including NSIPs, have the potential to have significant effects when considered together and cumulatively with this proposal. Areas of concern include, but are not limited to, the timing of construction, impacts on highway networks, impacts on commercial operations, amenity, skills, and tourism.

BMSDC welcome discussions to agree appropriate study areas for the consideration of effects, including cumulative effects, interrelationships and the identification of a long list of other reasonably foreseeable development.

Main Alternatives Considered

BMSDC expect consideration of alternatives to extend to the converter station, point of connection to the EACN and how this might deliver both the project objectives and the best outcome for strategic network design, enabling future development and the councils' objectives for growth and decarbonisation.

Landscape and Visual Amenity

BMSDC have concerns regarding the potential for significant landscape and visual effects of the onshore elements of the development, in particular the converter station, both alone and within the cumulative effects of the development with other projects such as Norwich to Tilbury, North Falls and Five Estuaries, on the setting of the National Landscape. The councils welcome the applicant's commitment to consultation to discuss assessment and viewpoints.

Socio-economics

BMSDC have particular concerns regarding the potential effects of construction traffic on the main highway network, including the A120, A12 and A14, that may affect the ongoing operations of Freeport East and associated businesses. It is noted that the scoping report identifies the potential for impacts on Harwich Port and Felixstowe Port but there is no mention of the Freeport. The ES should include consideration of effects on the Freeport and associated businesses.

It is noted that the impacts of workforce sourcing, accommodation and social integration on the local housing market and communities are to be addressed in the ES.

Traffic and Transport

Given the relatively limited major highway network in the area, on which many communities and businesses rely, and where closures and diversions have the potential for significant effects, the ES should include adequate information to enable assessment of the effects of the development on the wider region area in respect of traffic and transport issues, including the effects of abnormal indivisible loads and cumulative traffic impacts with the delivery of other projects.



Babergh and Mid Suffolk District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

MSDC defer to the comments from Suffolk County Council and Essex County Council as the relevant highway authorities.

Kind regards,


Director of Place
Babergh and Mid Suffolk District Councils



Babergh and Mid Suffolk District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

From: NSIPs <nsips@cambridgeshire.gov.uk>

Sent: 13 April 2026 14:59

To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>

Cc: NSIPs <nsips@cambridgeshire.gov.uk>

Subject: RE: EN0210009 - Tarchon Interconnector Project - EIA Scoping and Consultation and Regulation 11 Notification

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

Good afternoon

Thank you for your email in relation to Tarchon Interconnector Project.

As Cambridgeshire County Council is a neighbouring authority, we would appreciate being kept informed of the scheme's progress.

Please could you remove planningdc@cambridgeshire.gov.uk from the distribution list and add nsips@cambridgeshire.gov.uk.

At present, we do not wish to provide any comments.

Kind regards

Consents Coordinator

Place and Sustainability

Pronouns: [why have I put this here?](#)

[Cambridgeshire County Council](#) | [Facebook](#) | [X](#)

Phone:

PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR



From: [REDACTED]@scottishpower.com>

Sent: 06 May 2026 16:42

To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>

Cc: [REDACTED]@scottishpower.com>; [REDACTED]

[REDACTED]@scottishpower.com>; [REDACTED]@scottishpower.com>; [REDACTED]

[REDACTED]@scottishpower.com>; [REDACTED]@scottishpower.com>; [REDACTED]

[REDACTED]@ScottishPower.com>

Subject: Tarchon Interconnector Project Scoping Consultation

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

Dear Planning Inspectorate,

Please see below responses to the consultation on the Tarchon Interconnector Project Scoping Report on behalf of East Anglia Three Limited, East Anglia Two Limited, East Anglia One North Limited and East Anglia One Limited.

East Anglia Three Limited

We are submitting this response on behalf of East Anglia Three Limited (EATL). We note that consultation has taken place with the developers of the North Falls and Five Estuaries Offshore Wind Farms. Given the similar proximity of the potential development to the East Anglia Three Export Cable Corridor, EATL would expect to be consulted at an early stage if the need for a cable crossing or cable laying in close proximity to the East Anglia Three Export Cable becomes apparent.

East Anglia Two Limited

We are submitting this response on behalf of East Anglia Two Limited . We note that consultation has taken place with the developers of the North Falls and Five Estuaries Offshore Wind Farms. Given the similar proximity of the potential development to the East Anglia Two Order Limits , East Anglia Two Limited would expect to be consulted at an early stage if the need for cable laying in close proximity to the East Anglia Two Order Limits becomes apparent.

East Anglia One North Limited

We are submitting this response on behalf of East Anglia One North Limited (EAONL). We note that consultation has taken place with the developers of the North Falls and Five Estuaries Offshore Wind Farms. Given the similar proximity of the potential development to the East Anglia One North Order Limits , EAONL would expect to be consulted at an early stage if the need for cable laying in close proximity to the East Anglia One North Order Limits becomes apparent.

East Anglia One Limited

We are submitting this response on behalf of East Anglia One Limited (EAOL). We note that consultation has taken place with the developers of the North Falls and Five

Estuaries Offshore Wind Farms. Given the similar proximity of the potential development to the East Anglia One Order Limits , EAOL would expect to be consulted at an early stage if the need for cable laying in close proximity to the East Anglia One Order Limits becomes apparent.

Regards,

[REDACTED]



[REDACTED] | Offshore Consents Manager | **Consent Compliance**

Mob: [REDACTED]

Follow us



Take care of the environment. Print only if necessary

[Internal Use](#)

Please consider the environment before printing this email.

If you have received this message in error, please notify the sender and immediately delete this message and any attachment hereto and/or copy hereof, as such message contains confidential information intended solely for the individual or entity to whom it is addressed. The use or disclosure of such information to third parties is prohibited by law and may give rise to civil or criminal liability.

The views presented in this message are solely those of the author(s) and do not necessarily represent the opinion of Scottish Power Renewable Energy Ltd. or any company of its group. Neither Scottish Power Renewable Energy Ltd. nor any company of its group guarantees the integrity, security or proper receipt of this message. Likewise, neither Scottish Power Renewable Energy Ltd. nor any company of its group accepts any liability whatsoever for any possible damages arising from, or in connection with, data interception, software viruses or manipulation by third parties.

The Planning Inspectorate
Environmental Services
Infrastructure Decisions And Applications
Service
Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Please reply to: 

Email: Development.control@enfield.gov.uk

My ref: 26/01426/OAPINS

Date: 16 April 2026

Dear Sir/Madam

Town and Country Planning Act 1990

NO OBJECTIONS RAISED

Proposed work: EN0210009 - Tarchon Interconnector Project - EIA Scoping and Consultation and Regulation 11 Notification
At: Tarchon Interconnector Project

Thank you for your notification of the above development which was registered in this office on 8th April 2026.

I have reviewed the information provided on your website and consider that the proposals would not have any strategic implications for this Borough.

Yours faithfully



 **Head of Planning and Building Control**
Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XY
www.enfield.gov.uk

██████████ – Senior EIA Advisor
Planning Inspectorate

Reference: OR-0002227/01
Customer reference: EN0210009

Sent via email:

tarchoninterconnector@planninginspectorate.gov.uk

06 May 2026

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

**Tarchon Interconnector electricity lines Nationally Significant Infrastructure
Project. Between Ardleigh, Essex and south of Harwich, Essex, continuing
offshore in UK waters off the Essex coast to the UK EEZ with the Netherlands**

Environment Agency Scoping Consultation Response

Dear ████████,

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Tarchon Energy Limited (the applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the proposed development). This consultation was received on 8 April 2026.

We have reviewed the submitted Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report (Part 1: Volumes 1 to 5; Part 2: Volume 6, Annexes; dated April 2026, Rev 01) prepared by APEM Group on behalf of Tarchon Energy Limited, insofar as it relates to our remit, and provide the advice set out below.

We must take issue with the scope of the Environmental Impact Assessment (EIA) as currently defined and would recommend further issues are scoped in to meet the requirements of the EIA regulations.

Further detail is provided within:

- Appendix A – Comments on the scope of the EIA
- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

Please note this response does not represent our final view in relation to any

future Development Consent Order (DCO) application, or any environmental permit/licence 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 trust this advice is useful.

If you have any questions regarding our response, please contact
Nlteam@environment-agency.gov.uk.

Yours sincerely,



Planning Specialist, National Infrastructure Team

Nlteam@environment-agency.gov.uk

Appendix A – Comments on the scope of the EIA

Flood risk and coastal change

Document Reference(s): Volume 02, Chapter 08: Water Environment	
Issue (ref. EA01)	It has not been considered whether existing flood defence assets could be affected by the proposed development.
Impact	This omission creates uncertainty regarding potential impacts on flood defence infrastructure. Unassessed works could adversely affect flood risk, flow conveyance, or asset integrity without appropriate mitigation.
Solution	It should be clearly stated whether the proposed development will affect flood defence assets, including temporary or permanent main river crossings. This should be explicitly scoped in or out of the assessment with clear justification.
Additional narrative/explanation Where flood and coastal defence assets are present, asset condition should be surveyed before and after the works, with any identified defects remediated. Excessive vibration can damage flood defence assets, reducing effectiveness and lifespan. Vibration monitoring should therefore be undertaken, with safe thresholds defined to avoid adverse effects.	

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-18: Elements Scoped In and Out for Water Environment	
Issue (ref. EA02)	Flood risk to the Proposed Development (including construction activities and operational infrastructure) has not been scoped into the assessment. The current assessment focuses on impacts to flood risk elsewhere rather than the development's own vulnerability.
Impact	If not appropriately assessed and mitigated, flood risk to the Proposed Development (including construction activities) could pose risks to safety, disruption to activities, impact the infrastructure over its lifetime.
Solution	Flood risks arising both from the construction and operational activities, as well as the flood risks to the construction activities and the operational infrastructure themselves should be scoped into the assessment.
Additional narrative/explanation In accordance with NPS EN-1 (2025), paragraph 5.8.7, new energy infrastructure should be designed to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.	

The Flood Risk Assessment should address temporary and permanent risks and identify appropriate mitigation measures, taking account of changes in future flood risk as a result of climate change, where relevant.

Any loss of fluvial flood storage (temporary or permanent) must be compensated for on a level-for-level and volume-for-volume basis. If the proposed development is to be delivered in phases then no phase should result in net loss of flood storage. Any losses in flood storage must be compensated for within the same phase or in advance.

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-11 Baseline Flood Risk Characterisation; Table 8-18: Elements Scoped In and Out for Water Environment

Issue (ref. EA03)	The search area for the Converter Station is identified as being within Flood Zone 1 (Table 8-18). However, flood risks may increase over the lifetime of the development due to climate change and flood zone designations may be subject to change.
Impact	Future flood risk may be underestimated, potentially undermining early design decisions.
Solution	It should be confirmed that flood risk will be assessed over the full project lifetime, accounting for the 1 in 100-year plus climate change fluvial flood event and the 1 in 200-year plus sea level rise tidal event, to inform site layout decisions.

Additional narrative/explanation

Future flood risk must be considered over the lifetime of the development. In line with the Planning Practice Guidance for Flood Risk and Coastal Change, a 75-year design life should be assumed.

Document Reference(s): Volume 02, Chapter 08: Water Environment

Issue (ref. EA04)	The Scoping Report does not sufficiently consider the specific coastal risks at the proposed landfall location at Little Oakley on the Tendring Peninsula. In particular, it fails to adequately consider that the area is subject to a managed realignment policy within the Shoreline Management Plan (SMP), and that parts of the frontage are already under an active managed realignment proposal.
Impact	The SMP identifies this frontage as not economically viable to defend in the long term, meaning existing coastal and flood defences are unlikely to be maintained for the full lifespan of the proposed development. Constructing new infrastructure within this benefit area would not materially alter that long-term assessment. As a result, the proposed

	landfall infrastructure could be exposed to increasing tidal flood risk over time, potentially compromising its safety, functionality, and resilience.
Solution	The environmental assessment should explicitly address how tidal flood risk to the landfall site would be managed throughout the entire operational life of the development. This should include consideration of the planned withdrawal or failure of existing defences in line with SMP policy, and how the proposal would adapt to, or remain compatible with, managed realignment of the coastline.
Additional narrative/explanation	
The need for this assessment is particularly important given that managed realignment is not a hypothetical future policy but an active and progressing approach for parts of this frontage. Any long-term infrastructure proposal in this location should therefore demonstrate alignment with SMP objectives and set out a clear, realistic strategy for managing coastal change and flood risk over time.	

Fish

Document Reference(s): Volume 02, Chapter 10: Onshore Biodiversity – section 10.5.1.1	
Issue (ref. EA05)	Environment Agency fish survey data has not been used to inform the baseline.
Impact	Without a complete baseline data set, impact-pathways cannot be adequately identified and assessed.
Solution	Environment Agency fish survey data should be included in the desk study to inform the baseline assessment.
Additional narrative/explanation	
Environment Agency fish survey data is freely available at: https://environment.data.gov.uk/ecology/explorer/ . Where there are likely to be impacts on watercourses, then fish surveys should be completed to understand the fish baseline data.	
Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to):	
• impacts on fish from electro-magnetic fields (EMFs) where high voltage cables pass below watercourses. • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat • impacts from light pollution on watercourses and aquatic ecology	

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 02, Chapter 10: Onshore Biodiversity – Table 10-7 Elements Scoped In and Out for Onshore Biodiversity – Operational phase and fish receptor.

Issue (ref. EA06)	Impacts to fish from high voltage cables under watercourses during operation has been scoped out.
Impact	Potential effects on fish, particularly diadromous species, may not be identified or assessed.
Solution	Where high voltage cables are proposed beneath watercourses, impacts from EMFs should be scoped into the assessment.

Additional narrative/explanation

There is evidence to suggest that electromagnetic fields (EMFs) from high voltage cables (>132kV) can have behavioural impacts on diadromous fish as well as affect fish egg development.

Where it is proposed for high voltage cables to be buried underneath watercourses frequented by diadromous fish, an assessment on the impacts to fish from EMFs must be included. The assessment should look at the level of risk posed based on the species present, location in the catchment and severity of strength of EMF. Where it is likely that there will be an impact, on precautionary basis, mitigation may be necessary, such as burying cables deeper, or bundling cables together to cancel out magnetic fields. The assessment should give estimates of the likely (worst case) levels of EMF at the bed of the watercourse and how they compare to natural background levels.

Document Reference(s): Volume 03, Chapter 15: Fish and Shellfish Ecology – sections 15.7.4.2 and 15.7.4.3

Issue (ref. EA07)	Impacts on diadromous fish from underwater noise during construction and decommissioning have not been scoped into the assessment.
Impact	Potential noise effects on fish may be underestimated, including the risk of cumulative impacts.
Solution	Noise impacts on diadromous fish should be scoped into the assessment, including consideration within the cumulative effects assessment.

Additional narrative/explanation

Depending on intensity, noise impacts could be felt by fish over distances of hundreds of metres (refer to Sound Exposure Guidelines for Fishes and Sea Turtles, Popper *et al*, 2014). As such, there is a risk of cumulative impacts.

Document Reference(s): Volume 01, Chapter 02: UK Project Description – section 2.4.2.15

Issue (ref. EA21)	There are potential impacts on European eel arising from the use of trailer suction hopper dredging and flow excavators. It is not clear that the specific impacts of dredging have been scoped into the assessment.
Impact	Trailer suction hopper dredging and flow excavation involve the abstraction and movement of water and sediment, which may result in the entrapment of European eel. Furthermore, eels may succumb to physical damage due to the shear stress associated with flow excavation techniques.
Solution	It should be confirmed that the potential impacts of dredging techniques on European eel will be explicitly scoped into the assessment. Where relevant, the Environmental Statement should set out appropriate mitigation and demonstrate that risks to eel have been adequately assessed.
Additional narrative/explanation European eel are present year-round in estuarine environments and often found buried in sediment in the winter months. Consequently, eels are at most risk where these dredging techniques are used in the estuarine environment. Flow excavators and trailer suction hopper dredging may be subject to compliance with the Eels (England and Wales) Regulations 2009 and should therefore also be considered in the assessment. Given that these activities are likely to require a Marine Management Organisation (MMO) licence, it is recommended that the Environment Agency is consulted by the MMO to determine whether the works are subject to, and compliant with, the Eels Regulations.	

Geomorphology

Document Reference(s): Volume 05: Summary Chapters – Table 13-13: Elements Scoped In and Out for Marine Physical Environment; Table 34-2: Elements to be scoped in and out (offshore topics)	
Issue (ref. EA08)	Seabed scouring associated with cable protection during operation has been scoped out.
Impact	While the justification for scoping out seabed scour is that effects are localised and minor, impacts to seabed morphology have been scoped in. This inconsistency may result in an incomplete assessment, particularly in relation to potential cumulative effects from multiple localised scour features.

Solution	Seabed scouring associated with cable protection should be scoped into the assessment to evaluate how localised scour at multiple locations may cumulatively affect wider seabed morphology.

Marine (inshore Water Framework Directive and ecology)

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-6: WFD Water Bodies - Current Status and Classification (EA, 2025a) [pdf p228]	
Issue (ref. EA09)	Chemical status is identified as “does not require assessment” for multiple water bodies, based on an apparent misinterpretation of interim 2022 Catchment Data Explorer outputs rather than the current River Basin Management Plan (RBMP) classifications.
Impact	This may result in an incorrect baseline and omission of required assessment, as all surface water bodies are subject to chemical status objectives.
Solution	The baseline should be corrected to reflect the latest RBMP Cycle 3 classifications (2019 data), and chemical status should be appropriately assessed for all relevant water bodies.

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-6: WFD Water Bodies - Current Status and Classification (EA, 2025a) [pdf p228]	
Issue (ref. EA10)	Hydromorphology is described as “Not high” for several water bodies, which is incorrect terminology. Hydromorphology is a supporting element and does not itself generate a status classification.
Impact	This may lead to misinterpretation of Water Framework Directive (WFD) objectives, particularly for Heavily Modified Water Bodies (HMWBs), where classifications should be based on ecological potential rather than ecological status.
Solution	The assessment should be corrected to reflect that hydromorphology is a supporting element, and that WFD classifications for HMWBs are expressed in terms of ecological potential, informed by Mitigation Measures assessment outcomes.

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-6: WFD Water Bodies - Current Status and Classification (EA, 2025a) [pdf p228]	
Issue (ref. EA11)	There is a lack of clarity regarding data sources, including the use of “EA, 2025a,” which appears to include datasets not used for River Basin Management Plan (RBMP) classifications (e.g. 2022 classification outputs). It is also unclear how different status classes relate to these data sources.

Impact	This may result in inconsistencies in the baseline, with potential confusion between RBMP classification data and non-RBMP datasets, and an incomplete assessment if relevant elements (including “Priority hazardous substances” and “Priority substances”) are not fully scoped.
Solution	The assessment should clearly distinguish between RBMP classification data and supporting datasets, confirm the data sources used for each status class, and ensure that both “Priority hazardous substances” and “Priority substances” are appropriately scoped into the assessment.

Document Reference(s): Volume 03, Chapter 15: Fish and Shellfish Ecology – Table 15-11

Issue (ref. EA12)	The increased risk of introduction and/or spread of invasive non-native species (INNS) has been scoped out on the basis that it will be managed through a Construction Environmental Management Plan (CEMP).
Impact	While a CEMP may reduce the risk, it should not remove the need to evaluate the risk within a scoping context. As such, there is a risk of INNS introduction and spread not being adequately assessed, potentially leading to ecological impacts on native species and habitats.
Solution	The risk of INNS introduction and spread should be scoped into the assessment, with the effectiveness of mitigation measures (including the CEMP) considered as part of the EIA.

Groundwater quality and contaminated land

Document Reference(s): Volume 02, Chapter 07: Ground Conditions and Contamination – Table 7-7: Elements Scoped In and Out for Ground Conditions and Contamination; sections 7.5.10.7 and 7.7.3.1

Issue (ref. EA13)	Operational phase risks relating to Ground Conditions and Contamination have been scoped out of the assessment, but potential operational phase risks have been identified (see section 7.5.10.7). We disagree with scoping out this matter.
Impact	While the Scoping Report states that risks can be effectively mitigated through appropriate design, without first assessing the risks, it cannot be determined if the mitigation will be appropriate. This creates uncertainty as to whether potential impacts to controlled waters have been fully identified and addressed.
Solution	Operational phase risks to groundwater and surface water should be scoped in and assessed.

Additional narrative/explanation

In section 7.7.3.1 it states: “Operational phase effects are scoped out for this Ground Conditions and Contamination because no credible pathways for significant impacts

on Ground Conditions and Contamination have been identified once construction is complete; therefore, the Scoping table focuses solely on construction and decommissioning impacts.”

This appears to contradict section 7.5.10.7, where operational risks are identified. While these may be mitigated through design and embedded mitigation, we consider that further assessment is required to fully assess the risks and ensure mitigation is appropriate.

Section 7.7.2.7 states that the converter station will be operated under an environmental permit, and any operational risks associated with this will be managed under that. It should be noted that any activities outside the permitted area would not be managed under the permit and other controls will need to be in place. We recommend early engagement with our National Permitting Service to understand permit requirements.

We consider that the impacts on the source “Potential impacts on groundwater and surface water from contamination” identified in Table 7-7 could also apply during operation. For example, previously unknown contamination, or a new source of contamination, could be identified during any planned or unplanned maintenance. If contamination is encountered during operation, “potential impacts from remediation” also cannot be ruled out.

Heat pollution or other thermal effects on groundwater are not included as a potential impact in Table 7-7, but they are identified as a risk in section 7.5.10.7. While it is proposed that this “can be effectively mitigated through appropriate design”, it should be scoped in for further assessment until designs and proposed mitigation are known.

The potential operational phase risks identified in section 7.5.10.7 also apply assessment in the Water Environment chapter.

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-18: Elements Scoped In and Out for Water Environment; Chapter 07: Ground Conditions and Contamination – section 7.5.10.7

Issue (ref. EA14)	Operational phase risks to groundwater have been scoped out of the assessment in the Water Environment chapter. Table 8-18 states that “no works would connect to aquifers during operation”. However, the Scoping Report identifies widespread superficial soils (Secondary A aquifer), which we understand to be in contact with the cable, some joint bays and the converter station. The potential operational phase risks

	identified in section 7.5.10.7 also apply to the assessment in the Water Environment chapter.
Impact	Potential residual risks to groundwater during construction. Without first assessing the risks, it cannot be determined if embedded mitigation will be appropriate. This creates uncertainty as to whether potential impacts to controlled waters have been fully identified and addressed.
Solution	Operational phase risks to groundwater and surface water should be scoped in and assessed.

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-18: Elements Scoped In and Out for Water Environment

Issue (ref. EA15)	The decommissioning phase is not included in the Water Environment scoping table (Table 8-18). Therefore, the potential decommissioning impacts on groundwater quality have not been explicitly scoped in or out in of the Water Environment assessment.
Impact	There is the potential for direct and indirect impacts to groundwater from infrastructure during decommissioning. Consequently, there is uncertainty in the assessment coverage and a lack of detail concerning impact sources and groundwater receptors.
Solution	In the absence of clear scoping, all decommissioning elements should be scoped in.

Additional narrative/explanation

Decommissioning impacts for the Water Environment are referenced in the summary scoping table (Table 34-1 in Volume 05, Chapter 34: Summary and Conclusions), but this information is not presented in Volume 02, Chapter 08: Water Environment. This inconsistency creates confusion regarding the intended scope of the assessment and should be clarified to ensure transparency and alignment across chapters.

Given that an Outline Decommissioning Environmental Management Plan (ODEMP) will be produced, this indicates that impacts requiring management are anticipated, reinforcing the need for inclusion.

Document Reference(s): Volume 04, Chapter 31: Other Environmental Topics – section 31.3.2.1 and Table 31-2: Elements Scoped In and Out for Heat and EMF

Issue (ref. EA16)	The scoping table for heat and EMF (Table 31-1) does not include shallow groundwater (onshore) as a receptor.
Impact	Potential impacts on shallow groundwater abstractions (if present) may not be assessed.
Solution	Thermal impacts to groundwater (including abstractions) should be scoped into the assessment across all EOS phases, and any

	abstractions from superficial aquifers identified to assess potential localised heating or cooling effects.
Additional narrative/explanation	
Section 31.3.2.1 it states: "Existing land uses within the EOS Scoping Boundary are typical of rural and semi-rural environments, with no receptors that are uniquely sensitive to heat exposure." Shallow groundwater, and any abstractions therefrom, should be considered a receptor.	
It is indicated in the Scoping Report that Environment Agency and Tendring District Council will be contacted to obtain information on any public and private abstractions (e.g. Volume 02, Chapter 07: Ground Conditions and Contamination, Table 7-2: Additional Data Sources and Volume 02, Chapter 08: Water Environment, sections 8.5.1.44 and 8.6.6.3). This information should inform the assessment of potential thermal effects on groundwater to ensure risks are appropriately characterised.	

Surface water quality

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-18: Elements Scoped In and Out for Water Environment	
Issue (ref. EA17)	Temporary deterioration of water quality is scoped in (Table 8-18), but risks from concrete pouring and drilling fluid break-out during construction are not explicitly identified.
Impact	Without explicit inclusion of concrete and drilling fluid break-out risks in the assessment scope, potential direct and indirect impacts on surface water and groundwater may not be fully assessed.
Solution	Risks from concrete works and drilling fluid break-out should be explicitly scoped into the construction phase assessment for both surface water and groundwater.
Additional narrative/explanation	
While activities such as spillages or pollution during earthworks are referenced in Table 8-18, other construction activities are not clearly identified.	
These impacts should consequently also be included in 8.7.3.1 as they have the potential to adversely impact the water environment.	
Document Reference(s): Volume 02, Chapter 08: Water Environment – sections 8.7.3.5 and 8.8.1.11	
Issue (ref. EA18)	Foul water impacts from temporary welfare facilities are described (sections 8.7.3.5 and 8.8.1.11) but not explicitly scoped into the assessment (Table 8-18).

Impact	If not managed correctly, foul waste could lead to nutrient enrichment and contamination of receiving water bodies.
Solution	Foul water impacts should be scoped into the Water Environment assessment.
Additional narrative/explanation Sections 8.7.3.5 and 8.8.1.11 state there will be temporary welfare facilities which will either connect to the public sewer or otherwise be captured in a cesspit/tank. Foul water is not explicitly scoped out but is omitted from Table 8-18, creating ambiguity. Foul water impacts should consequently also be included in section 8.7.3.1, given its potential to adversely affect the water environment. Where discharge to the public sewer is proposed, the Applicant should engage with the local water company to confirm adequate sewer capacity is available, and that no adverse effects will occur due to the connection. Where offsite disposal via road transport is necessary, this should be addressed within the project's waste management procedures.	

Document Reference(s): Volume 02, Chapter 08: Water Environment – Table 8-18: Elements Scoped In and Out for Water Environment

Issue	The decommissioning phase is not included in the Water Environment (ref. EA19) scoping table (Table 8-18). Therefore, the potential decommissioning impacts on surface water quality have not been explicitly scoped in or out in of the Water Environment assessment.
Impact	There is the potential for direct and indirect impacts to surface waters from infrastructure during decommissioning. Consequently, there is uncertainty in the assessment coverage and a lack of detail concerning impact sources and surface water receptors.
Solution	In the absence of clear scoping, all decommissioning elements should be scoped in.
Additional narrative/explanation Decommissioning impacts for the Water Environment are referenced in the summary scoping table (Table 34-1 in Volume 05, Chapter 34: Summary and Conclusions), but this information is not presented in Volume 02, Chapter 08: Water Environment. This inconsistency creates confusion regarding the intended scope of the assessment and should be clarified to ensure transparency and alignment across chapters. Given that an Outline Decommissioning Environmental Management Plan (ODEMP) will be produced, this indicates that impacts requiring management are anticipated, reinforcing the need for inclusion.	

Water resources

Document Reference(s): Volume 02, Chapter 08: Water Environment	
Issue (ref. EA20)	The Water Environment chapter does not assess consumptive water demand for the project, particularly during the construction phase. As a result, there is insufficient information to demonstrate that a sustainable and deliverable water supply has been evaluated to meet anticipated needs.
Impact	Without estimating potential water demands, sources of water supply available to the project cannot be appraised. This creates uncertainty around deliverability, potential environmental effects, and whether appropriate supply and mitigation measures can be secured.
Solution	The Water Environment chapter should set out a water supply strategy that includes estimates of construction water demand, an appraisal of potential supply options, and a clear assessment of the constraints, risks and feasible mitigation measures associated with each.
Additional narrative/explanation NPS EN-1, section 5.16.7, requires that the Environmental Statement should describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance. Typical construction water demands likely to require assessment include (but are not limited to): • Potable water for welfare facilities • Dust suppression • Wheel/concrete washing • Concrete batching • Drilling fluids (e.g. for HDD activities) Without a clear estimate of demand, the suitability of supply options cannot be determined. For example: • Capacity and availability of mains supply (e.g. via Affinity Water) may be constrained, particularly in rural areas; • Reliance on tankered supply may increase vehicle movements and should be reflected in the Traffic and Transport assessment;	

- Surface water and groundwater abstraction may require licences and be subject to catchment-specific restrictions.

Operational water demand is expected to be negligible, and construction phase water supply is typically developed by contractors at the detailed design stage. However, many construction activities (e.g. dewatering and dust suppression) are licensable where abstraction exceeds 20 m³/day. Early consideration should therefore be given to identifying viable water sources where mains supply is not available. This is particularly important given that new consumptive groundwater licences are not available, and surface water abstraction is restricted to periods of high flow only. The Environment Agency seeks to ensure that water availability is realistically assessed at an early stage to avoid constraints on project viability.

The project boundary intersects Hamford Water SSSI, SAC, SPA and Ramsar designations, for which [operations requiring consent](#) include abstraction or changes to surface water and groundwater levels. Any proposed abstraction may require a Habitats Regulations Assessment (HRA) as part of the abstraction licensing determination.

Appendix B – General advice on the proposals and EIA content

Biodiversity and geomorphology

Document Reference(s): Volume 02, Chapter 10: Onshore Biodiversity – section 10.3.2.1	
Issue (ref. EA22)	The applicable legislation does not reference Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
Impact	There is a risk of not considering new environmental definitions in legislation in respect of biodiversity net gain, such as ‘irreplaceable habitat’, along with related offences to said habitats.
Solution	The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 should be included for completeness. It should also be ensured the development proposals meet the requirements of this legislation.

Document Reference(s): Volume 02, Chapter 10: Onshore Biodiversity – section 10.5.7.8	
Issue (ref. EA23)	It is mentioned that Modular River Physical (MoRPH) surveys will be undertaken, we are supportive of habitat condition surveys for watercourses within the proposed development. MoRPH surveys only cover the field survey elements of the wider River Condition Assessment (RCA) which is required for reporting a watercourse condition in the BNG metric.
Impact	Relying solely on MoRPH survey data would result in non-compliance with Defra’s Statutory Biodiversity metric guidelines which potentially leads to the incorrect classification of river habitat condition and inaccurate calculations of baseline biodiversity units.
Solution	To inform watercourse habitat condition, a full RCA should be undertaken by a qualified RCA assessor for all watercourses within the proposed development boundary and all watercourses within 10m of the boundary, in line with Defra’s statutory biodiversity metric guidance.

Document Reference(s): Volume 02, Chapter 8: Water Environment – section 8.7.3.6	
Issue (ref. EA24)	Culverts may be used for watercourse crossings.
Impact	Culverts have the potential to impact upon the riparian zone, fragmenting habitats, creating barriers to mammal passage and altering natural flows and sediment transport
Solution	Avoid the use of culverts. Use the water crossing hierarchy when determining watercourse crossings

Additional narrative/explanation

Open span crossings with set-back abutments are preferred for all uses (permanent and temporary). If open span is not suitable, then arched or three-sided culverts, which do not interfere with the channel bed and allow passage of water and sediment downstream, are the next best choice.

There may be opportunities to enhance the ecological value of existing watercourse crossings. For example, the removal of an existing culvert and its replacement with an open-span bridge could be explored. Such an approach could contribute watercourse units to the Biodiversity Net Gain (BNG) metric.

For main rivers, the Environment Agency has a general policy against the use of culverts (please refer to Appendix C for further information).

For ordinary (non-main river) watercourses advice should be sought from the Lead Local Flood Authority (LLFA) / Internal Drainage Board (IDB), where applicable, regarding use of culverts and appropriate crossing methodologies, taking into account the waterbody WFD status, sensitivity and actions outlined in the local RBMP.

Groundwater quality and contaminated land

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 01, Chapter 02: UK Project Description – section 2.7.1.2

Issue (ref. EA25)	Insufficient information is provided regarding the proposed decommissioning of the scheme.
Impact	Without this information, the potential impacts of decommissioning on groundwater, particularly those arising from infrastructure that may be left in situ, cannot be adequately assessed.
Solution	Provide a comprehensive discussion of decommissioning within the PEIR and ES. This should include a detailed assessment of the risks associated with leaving infrastructure in situ, such as the long-term effects of cables, ducting, and concrete remaining underground and degrading over extended timescales.

Additional narrative/explanation

Section 2.7.1.2 states that “the offshore cables and any external cable protection may be either fully removed or left in-situ.” However, it does not address the proposed approach for onshore infrastructure, including cables, cable protection, joint bays, the converter station, or other associated assets.

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 02, Chapter 07: Ground Conditions and Contamination – Table 7-3: Definitions of Sensitivity for Ground Conditions and Contamination; Volume 02, Chapter 08: Water Environment – Table 8-14: Definitions of Receptor Importance for Water Environment	
Issue (ref. EA26)	The receptor sensitivity criteria presented in Table 7-3 are inconsistent with both the referenced documentation and Table 8-14 and are not fully appropriate. Additionally, Table 8-14 does not account for SPZ3, despite its presence within the site boundary.
Impact	The sensitivity of controlled water receptors in Chapter 07 has been assessed using unsuitable criteria.
Solution	Table 7-3 should be reviewed and revised in accordance with DMRB LA113 Table 3.70 as appropriate. The definitions applied in Table 8-14 should also be considered. In addition, Table 8-14 should be updated to include SPZ3, reflecting its presence within the site boundary.
Additional narrative/explanation	
In DMRB LA113, a “Very high” importance category is used. This has not been applied, and it appears that all surface water and groundwater receptors have instead been assigned to the next lower category. We disagree with this application of the guidance.	
Principal aquifers and SPZ2 should be at least “High” importance, while secondary aquifers and SPZ3 should be at least “Medium” importance. In addition, WFD surface water classifications should align DMRB LA113.	

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 02, Chapter 07: Ground Conditions and Contamination – section 7.7.2.9; Volume 02, Chapter 08: Water Environment – section 8.7.3.1 and Table 8-18: Elements Scoped In and Out for Water Environment.	
Issue (ref. EA27)	The potential requirement for dewatering has not been sufficiently addressed, and there is no clear commitment to the preparation and implementation of a dewatering management plan.
Impact	Dewatering activities may be undertaken without the necessary environmental permit or exemption, posing a risk to controlled waters.
Solution	A clear commitment should be included to develop and implement an appropriate dewatering scheme, in line with regulatory requirements (see relevant informative comment in Appendix C).
Additional narrative/explanation	
Where superficial sands and gravels are present, there is a potential for shallow groundwater to be encountered. As such, dewatering of cable trenches may be	

necessary. This must be done under the relevant environmental permit or exemption.

Section 7.7.2.9 states that “appropriate mitigation measures ... are identified in [Chapter 08], including ... an appropriate dewatering scheme.” However, no such detailed discussion or specific commitment has been identified in Chapter 8, although we note that dewatering is scoped in for further assessment (Table 8-18).

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 02, Chapter 08: Water Environment – Table 8-15: Definitions of magnitude of impact for Water Environment

Issue (ref. EA28)	The magnitude definitions presented in Table 8-15 appear to relate only to the construction phase.
Impact	Definitions should apply to the whole scheme. The phases they apply to, and impacts scoped out, are determined later.
Solution	Table 8-15 should be revised so that the magnitude definitions are applicable to any phase of the project.

Additional narrative/explanation

Definitions of magnitude in other chapters are not associated to a specific phase of the project (for example, Table 7-4).

Only construction and operation are mentioned here. Decommissioning also needs to be considered.

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 04: UK Scheme Wide – Table 30-5: Major Accidents and Disasters Scoping Table

Issue (ref. EA29)	The control and management measures to prevent pollution refer only to the construction and decommissioning phases, with no measures identified for the operational phase.
Impact	The absence of control measures during operation presents a risk of pollution to controlled waters arising from maintenance or other operational activities.
Solution	Control and management measures should be defined for the operational phase, including activities such as maintenance.

Additional narrative/explanation

Section 7.7.2.7 states that the converter station will be operated under an environmental permit, and any operational risks associated with this will be managed under that. It should be noted that any activities outside the permitted area would not be managed under the permit and other controls will need to be in place.

We recommend early engagement with our National Permitting Service to understand permit requirements.

Surface water quality

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 01, Chapter 02: UK Project Description – sections 2.1.1.1 and 2.4.4.7; Volume 02, Chapter 08: Water Environment – section 8.7.3.3	
Issue	Trenchless cable installation is proposed (sections 2.1.1.1 and 2.4.4.7), (ref. EA30) but there is no mention of a drilling fluid management plan.
Impact	In the event of a drilling fluid breakout, there is a risk of reduced water quality if drilling fluids enter surface waters.
Solution	A commitment should be made to prepare and implement a drilling fluid management plan, and this should be secured within the Outline Construction Environmental Management Plan (oCEMP).
Additional narrative/explanation	
Section 8.7.3.3 states that drilling fluids will be carefully managed to prevent breakout into the channel. However, this should be formalised through a specific management plan to ensure effective implementation.	
Furthermore, where it is stated that launch and receiving pits should be set back from the edge of a watercourse by a suitable distance, this should be defined as a minimum of 10 metres from the top of the bank to reduce the risk of pollution.	

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 01, Chapter 02: UK Project Description – sections 2.4.4.4 and 2.4.6.5	
Issue	It is suggested that pre-construction surveys will be undertaken (sections (ref. EA31) 2.4.4.4 and 2.4.6.5). However, it is unclear whether these surveys will include water quality monitoring.
Impact	If appropriate water quality monitoring is not undertaken, a suitable baseline dataset may not be established. This could limit the ability to identify and assess any changes in water quality, including deterioration or improvement associated with the project.
Solution	A water quality monitoring plan should be prepared and submitted as part of the Environmental Statement. This should clearly set out monitoring locations, frequency, parameters, and methods. In addition, confirmation should be provided on how this monitoring commitment will be secured.
Additional narrative/explanation	

Water quality monitoring should be undertaken prior to construction, throughout the construction phase, and during the initial operational period. Monitoring should be carried out at least monthly, with sampling locations established both upstream and downstream of watercourse crossings and discharge points.

The frequency should occur at least monthly and the locations should be upstream and downstream of any water crossings or discharges. Methods of site walkovers for visual assessment, use of hand-held devices in-situ and samples sent to a laboratory should be confirmed.

The monitoring plan should be secured through the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP).

Document Reference(s): Tarchon Interconnector Project, Environmental Impact Assessment Scoping Report, Volume 01, Chapter 02: UK Project Description – sections 2.4.4.5; Volume 02, Chapter 08: Water Environment – sections 8.7.2.2 and 8.6.6.12

Issue (ref. EA32)	It is stated in (section 2.4.4.5) that an Outline Construction Environmental Management Plan (oCEMP) will be prepared. However, no reference is made to a drainage or surface water management plan. Consequently, it is unclear how drainage will be managed across all phases of the development.
Impact	Without a clearly defined surface water management approach, there is a risk that runoff containing sediment, hydrocarbons, heavy metals, or other hazardous substances could enter receiving watercourses and adversely affect water quality.
Solution	A surface water management plan should be prepared to define how drainage will be managed across all phases of the project. The surface water management plan should include consideration of appropriate mitigation measures to manage contamination risks from construction, operation, and decommissioning activities. The Environmental Statement should clarify whether Sustainable Drainage Systems (SuDS) are proposed, identify the types of SuDS to be implemented across different areas of the site, and explain how these will contribute to water quality improvement. Each proposed SuDS feature should also be supported by a maintenance schedule to ensure effective long-term performance, with reference to relevant best practice guidance such as the CIRIA SuDS Manual (C753F).

	The surface water management plan should be secured through the oCEMP, Outline Operational Environmental Management Plan (oOEMP), and Outline Decommissioning Environmental Management Plan (oDEMP), setting out how surface water will be managed during each phase of development.
Additional narrative/explanation Risks to water quality are most likely to arise during construction activities and during operation at the substation, particularly in the event of a fire or pollution incident. The approach should therefore consider how surface water drainage systems can be isolated, if necessary, to prevent pollution. If SuDS features are not adequately maintained, debris and sediment may accumulate, reducing their effectiveness in managing runoff and treating contaminants. The CIRIA SuDS Manual should also be included within the list of good practice guidance in section 8.7.2.2, as it is currently omitted despite being referenced earlier in section 8.6.6.12.	

Appendix C – Additional advice for the Applicant

Bathing waters

- EIA Scoping Report, Volume 02, Chapter 5. Legislative and Planning Policy Context; Chapter 6. EIA Approach and Methodology; and Chapter 8. Water Environment
- EIA Scoping Report, Volume 03, Chapter 13: Marine Physical Environment

There is no mention of Bathing Water legislation in Chapter 5 and 6, or in section 8.3.2.2 for Relevant Acts of Parliament associated with the Water Environment. Whilst we recognise it is listed in section 13.3.2, we recommend it is included in earlier chapters too as Onshore components of the scheme can have an effect on the offshore components since they are upstream.

Water quality and WFD Assessment advice

- EIA Scoping Report, Volume 02, Chapter 8. Water Environment
- EIA Scoping Report, Volume 03, Chapter 13: Marine Physical Environment

Sections 8.6.6.14 and 13.6.1.8 discusses the WFD Assessment - see below for guidance:

We recommend the Applicant uses the Water Quality Explorer for available data for the baseline: [Map Explorer | Water Quality Explorer](#).

This advice summarises the requirements of The Water Environment Regulations 2017 in relation to Nationally Significant Infrastructure Projects: [Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK](#)

This advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that can be used for other water bodies such as rivers, lakes and groundwater: [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK](#)

We recommend having clear onshore and offshore sections of your WFD Assessment.

Out of date guidance

Out of date guidance is referenced in Volume 02, Chapter 7, section 7.3.3.1: BS10175:2011+A2:2017 should be BS10175:2026

Dovercourt, West End Land historic landfill site

The applicant has acknowledged the Dovercourt, West End Land historic landfill site in sections 7.5.8.1 to 7.5.8.2, however this is not discussed later in the chapter. If any works are proposed in or near the site, we expect additional investigations and controls in place to mitigate any risks. Handling of any excavated waste material must be done in accordance with all relevant legislation and guidance.

Operational Environmental Management Plan (OEMP)

Operational Environmental Management Plan (OEMP) not included in the list of embedded mitigation for ground conditions and contamination (Volume 02, Chapter 7, Table 7-6). We consider that it should be.

We note that one is proposed (section 2.6.4.2). Some example relevant potential operational risks are discussed in section 7.5.10.7. While the applicant proposes to mitigate these through design, we consider that ongoing management and maintenance of the mitigation measures may need to be included in the OEMP, or documents appended to or referenced in the OEMP.

An environmental permit for the converter station is discussed in section 7.7.2.7, however this will not cover the whole cable route. The environmental permit is not mentioned in Chapter 8, where we consider it would also be relevant for discussions

Previously unidentified contamination

In the Outline Construction Environmental Management Plan (oCEMP), it is proposed to include mitigation measures to be implemented by contractors should any previously unidentified contamination be discovered during construction (Volume 02, Chapter 7, section 7.7.2.5). We agree with this approach.

We consider that equivalent measures should be included within the OEMP and DEMP, to address the same risk during these phases. While encountering contamination may be considered unlikely during operation and decommissioning, there may be a need to excavation in areas not accessed during construction, or there may be new contamination (such as from an off-site source) which impacts ground in the vicinity of the scheme. The LPA and Environment Agency will need to be consulted on the wording of the measures. They will also need to be added as consultees as part of the process.

Hydrogeological risk assessment and water supplies

Volume 02, Chapter 7, Table 7-2 and Volume 02, Chapter 8, sections 8.5.1.44 and 8.6.6.3: It has been confirmed that the Applicant will obtain data on the location of

private (unlicensed) and public water supplies from the EA and Tendring District Council. We agree with this approach.

A hydrogeological risk assessment will be required to consider any potential impacts the development may have on these receptors.

Embedded mitigation

Volume 02, Chapter 8, Table 8-17: Other embedded mitigation we consider necessary for the Water Environment, includes (but may not be limited to):

- Hydrogeological risk assessments, especially where trenchless drilling is proposed
- Drilling fluid breakout plan (for HDD): drilling additives for HDD and chemical suitability should be considered at an early stage, to ensure that any environmental permits of exclusions are in place in advance of works. We note “frac-out” events are acknowledged in 8.7.3.3.

Dewatering

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](#).

If the Applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#).

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 licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The Applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of

groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The Applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits.](#)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Embedded mitigation and good practice measures

Regarding Volume 02, Chapter 10: Onshore Biodiversity – section 10.7.2:

- The commitment to adhere to the mitigation hierarchy is welcomed, and further detail is anticipated as the Environmental Statement (ES) is developed.
- Table 10.6 identifies a range of embedded mitigation measures relevant to onshore biodiversity; further detail on these measures is expected in subsequent stages of the ES.
- An Invasive Species Management Plan should be prepared, including a pathway-specific risk assessment to identify potential routes for the spread of invasive species during construction, operation, and decommissioning. Robust biosecurity measures should form a core component of this plan.
- A riparian buffer should be maintained alongside all watercourses to protect river corridor integrity and associated ecology. As a minimum, this should be 10m from the bank top (or 5m for ditches), in line with Biodiversity Net Gain (BNG) guidance.

Biodiversity Net Gain (BNG) Calculation

Regarding Volume 02, Chapter 10: Onshore Biodiversity – section 10.7.3:

- The watercourse component of the BNG assessment will be an important consideration, and further detail is awaited.
- It is encouraged that BNG is embedded early within the design process and aligned with relevant local plans, Local Nature Recovery Strategies (LNRS), River Basin Management Plans (RBMP), and Water Framework Directive (WFD) mitigation measures.

Scoping Assessment (onshore – water environment)

In section 8.7.3 (Volume 02, Chapter 08: Water Environment) and its associated sub-sections, it is encouraging to see that, alongside broader impacts being scoped into the assessment, project-specific impacts are also being addressed. For

example, sections 8.7.3.2 to 8.7.3.4 recognise the potential effects of coastal erosion, with a commitment to locate the Transition Joint Bay (TJB) sufficiently inland to avoid the risk of cable exposure. Additionally, there is a clear intention to avoid open-cut crossings of watercourses, particularly main rivers, wherever practicable. The use of existing access crossings and routes is proposed to minimise the need for new bridges or culverts, and where new crossings are required, these will be designed in accordance with the established crossing hierarchy.

Culverting and removal of culverts

Culverting works against the natural processes of watercourses. It can exacerbate the risk of flooding and increase maintenance cost and complexity. It can also destroy wildlife habitats, hinder fish passage, reduce amenity value, interrupt the continuity of the linear corridor of a watercourse and can affect channel stability. It can also significantly reduce resilience to the effects of drought, floods and pollution. We will therefore take this into account in our decision making.

Detrimental effects of culverting watercourses can include:

- Increased likelihood of flooding due to their limited capacity and propensity for blockage, both of which can result in obstructions to flow, and loss of floodwater storage
- Exacerbating the nature of flooding by increasing flow velocities and speed of onset
- Loss of and adverse effects on morphology, fisheries and wildlife habitat including substrate
- If present, adverse effects on protected species
- The creation of barriers to fish passage through increased water velocities, behavioural deterrent, shallow depths, darkness, oxygen depletion and eroded culvert entrances
- Increased geomorphological risk including changes to channel stability, river bank and bed erosion and increased deposition around the culverted sections
- Greater difficulties in providing for drainage connections
- Increased liabilities and costs due to the need to maintain, repair and replace culverts or to manage upstream and downstream risks
- Increased health and safety hazards, notably for workers clearing blockages and for children in urban areas
- Locally reduced groundwater recharge
- Increased difficulty in detecting the origins of pollution and in monitoring water quality
- Reduced resilience for communities and wildlife to the effects of extreme weather events, climate change and acute pollution

In addition to avoiding the detrimental effects of new culverting listed above, the restoration of river corridors by removing or opening sections of existing culverting and restoring natural river beds and banks can have wider benefits, including:

- Providing habitat for wildlife and improving its connectivity
- Providing additional flood storage capacity and slowing flows
- Ameliorating the urban heat island effect
- Providing areas for recreational use
- Improving amenity, health and educational opportunities
- Increasing property prices and their desirability
- Reducing maintenance costs and improving safety

Watercourse crossings

The following 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 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 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:

1. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
2. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.

3. 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.

[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]

- Any potential construction, operational, and decommissioning phase impacts that 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 [EA] 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

Main river crossings (HDD and crossings register)

We recommend the use of Horizontal Directional Drilling for any crossings below a designated Main River. These should have a 5m or greater depth below the river bed level, but additional depth requirements may be necessary depending on proximity to flood defences.

As the proposal develops it would be beneficial to have a Crossing Register with the proposed main river crossing placements and types.

Water course 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.

Flood modelling

Fluvial flood modelling should be considered for watercourses which intersect with the Order Limits to better understand fluvial flood risk. It is important to note that some of our model data is old and may present limitations. Even the data which is more recent may not be suitable for the purposes you wish to use it for and should modelling work be required in connection with the activities, it will be necessary to check that the data used represents current risk, uses the latest available datasets, complies with current modelling standards, is at a scale suitable for the assessment you're undertaking, captures the detail required for a site-specific assessment, makes use of current climate change allowances. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) available online at [Using modelling for flood risk assessments - GOV.UK](https://www.gov.uk/government/publications/using-modelling-for-flood-risk-assessments) (www.gov.uk).

Please be aware that:

- Environment Agency models are not designed to assess third-party developments. The developer should not assume that the model is suitable for assessing the flood risk associated with the proposed development.
- It is the developer's responsibility to assess the suitability of a model for the project.
- The developer should provide evidence of any modelling checks and subsequent updates and document these in the FRA model reporting.

Note that if the catchment size is less than 3 km², then the flood risk may not be represented by the Flood Map for Planning and that there may exist an evidence-gap

Section 8.8.12 (Volume 02, Chapter 08: Water Environment) describes how it is assumed that the Converter Station will be located within Flood Zone 1. We welcome this, however, it is important to note that there are several ordinary watercourses which cross the proposed inland order limits for the development which have no associated Flood Zone mapping due to the small size of their catchments. There may be fluvial flood risk associated with these watercourses, it is just not modelled or mapped. The Risk of Flooding from Surface Water (RoFSW) dataset is a useful starting point for establishing the flood risk associated with smaller Ordinary Watercourses. Where a reliance is being placed on existing flood risk products such as the RoFSW mapping then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk including the effects of climate change. In some cases, more detailed hydraulic modelling may be required to understand the impacts of flood risk to the development and because of the development. We would welcome further discussion around this with the applicant as the project progresses.

Incorrect water body typology

Table 13-6 (Volume 03: Offshore Environment, Chapter 13: Marine Physical Environment): Two records of Essex water body (water body ID GB650503520001) are included within Table 13-6 (Volume 03, Chapter 13, page 37), with the typology of one of the records being incorrectly categorised as Transitional.

Maximum transmission capacity

Volume 01, Chapter 03: Approach to Alternatives (p.6): The report refers to a maximum transmission capacity of ~1.8 GW. However, the transmission capacity is stated as 1.4 GW within other sources (e.g. Ofgem). We recommend that this is corrected within the scoping report or clarified if referring to different criteria.

Flood risk activity permits (FRAPs) and associated disapplication of legislation

Requirement for environmental permit (flood risk activities)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge

- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once a Development Consent Order (DCO) has been approved, and we advise the to consult us at the earliest opportunity.

Disapplication of flood risk activity permits

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity as to whether you are seeking to disapply the Environmental Permitting Regulations (England and Wales) 2016 for flood risk activities as part of the DCO. Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

Waste management

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Waste to be taken off site

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Control of emissions from non-road going mobile machinery (NRMM)

Where development involves the use of any NRMM with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in [Regulation \(EU\) 2016/1628 \(as amended\)](#). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority (LPA).

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO_x), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM₁₀ and PM_{2.5}). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document.

The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

NRMM includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

END

██████ - Senior Environmental Advisor
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Our Ref: NSIPs/Tarchon
PINS Ref: EN0210009
Date: 6 May 2026
Telephone: 03330 139284

By Email only

tarchoninterconnector@planninginspectorate.gov.uk

Dear ██████,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Tarchon Energy Limited (the applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the proposed development)

Scoping Consultation

I refer to your letter dated 8 April 2026 identifying Essex County Council (ECC) as a consultation body regarding the applicant's request for a Scoping Opinion on the above proposed development.

ECC is working in partnership with Tendring District Council (TDC) on shared workstreams for this project. In response, ECC in conjunction with TDC, jointly referred to as "the Councils", would like to provide the following comments. It is understood that TDC would also provide a separate submission to complement specific matters.

The Proposed Development

The proposed development would provide a new high-capacity electricity interconnector linking Essex in the United Kingdom with Lower Saxony, Germany. The Tarchon Project will comprise both onshore and subsea electricity transmission infrastructure, with an indicative total route of approximately 800 kilometres.

The Project comprises three principal components:

- 1) **English Onshore Scheme (EOS)**: onshore infrastructure within Essex, including the landfall, cable routes, Converter Station and grid connection works;
- 2) **Marine Scheme**: subsea HVDC cables within UK, Dutch and German waters; and

- 3) **German Onshore Scheme:** onshore cable routes and a Converter Station connecting to a new substation near Niederlangen in Germany.

Electricity will be transmitted between interconnectors using High Voltage Direct Current (HVDC) technology. Converter Stations located at each end of the interconnector will then convert electricity between HVDC and High Voltage Alternating Current (HVAC) to enable connection to the respective national electricity transmission systems.

The onshore and offshore components within UK jurisdiction comprise the 'UK Scheme'. The exact siting of the landfall location is currently unknown, but it will be south of Harwich and north of Hamford Water. Underground cables will then transport the energy to the Interconnector, during construction an operational corridor width of 40m will be required. The precise location of the interconnector has not yet been identified but it will be within 5km of the proposed East Anglian Connection Node (EACN) in Ardeley. The Interconnector building will be up to 26 meters in height and requires a footprint of 10 hectares. From here a final set of underground cables will run the converted HVAC energy directly into the EACN.

Comments on the submitted EIA Scoping Report

Responses are provided below, for ease of reference follow the running order of the chapters in the Environmental Impact Assessment Scoping Report as submitted by the Applicant to PINS.

1. Introduction

Para. 1.1.1.3 & Table 2-2 – ECC notes that there seems to be an increase of the transmission capacity from 1.4GW to 1.8GW since the non-statutory consultation in 2025. There have been no explanation nor justifications provided to such change. It is unclear whether the increase in capacity has been communicated to the National Grid and if there are any implications to other parameters.

2. UK Project Description

Para. 2.4.5.7 – Given the maximum working corridor width is only 40m, the scoping extent is like 600m in width, which is disproportionately wide in comparison. ECC strongly doubts such a wide corridor is reasonable to be considered as the "Rochdale Envelope". As the impact of this submission will be hugely significant, particularly in the construction phase, this wide corridor makes it significantly problematic to consider impact and to assess the same on receptors.

Para. 2.4.8.4 – The first sentence is incorrect and misleading. While the 2 offshore windfarms share the onshore cable corridor between the landfalls to the joint substations, the proposed onshore order limits of Five Estuaries and North Falls Order Limits are not entirely identical, especially for the substation areas.

Para 2.6.3.3 – For each type of maintenance as may be required during the operational phase of the development, there needs to have an indication of the number of staff and vehicles are expected each time in order to understand the likely impacts.

It is noted that the final location of the Converter Station has not yet been determined, however, it will be sited within 5 km of the EACN, itself a wide search area which again is difficult to assess in terms of its impact on the local area. ECC advises that the UK Project Description should clearly acknowledge the cumulative context of the English Onshore Scheme within Essex, including the proximity of other nationally significant infrastructure projects such as Norwich to Tilbury, Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm. It is noted and welcomed that, as part of the wider consultation process set out in Chapter 4, the Applicant has engaged with these UK schemes and recognises the importance of an integrated and coordinated approach.

Where landfall locations, cable corridors or onshore works overlap spatially or functionally with other schemes, the Environmental Statement should demonstrate an understanding of cumulative Green Infrastructure (GI) and biodiversity effects, including habitat loss, fragmentation and reinstatement pressures. The UK Project Description should explain how GI design, mitigation and Biodiversity Net Gain delivery have been coordinated with other projects to avoid conflict or duplication and align with the Essex Local Nature Recovery Strategy (LNRS, 2025), ensuring that GI and BNG proposals remain deliverable within a constrained NSIP landscape.

Pre-construction and construction phase (Chapter 2) / Mitigation and Monitoring (Chapter 6: 6.4)

ECC welcomes the commitment to an Outline Construction Environmental Management Plan (CEMP) to accompany the DCO application, to be carried forward to a detailed CEMP prior to construction. The CEMP should include GI-related measures to:

- Reduce dust, noise, visual and landscape impacts.
- Prioritise early delivery of strategic GI to allow planting to establish and mature, providing landscape structure, screening and ecological benefits during construction; and
- Protect retained GI assets, including trees, hedgerows and designated sites such as Local Wildlife Sites, throughout the construction period.

Post-construction management and maintenance

The EIA Scoping Report proposes that an Outline Landscape and Ecological Management Plan (LEMP) will accompany the DCO application, with measures carried forward into a CEMP. Essex County Council notes that a CEMP is not an appropriate mechanism for securing the long-term delivery, management and maintenance of GI.

ECC therefore recommends that a detailed LEMP is secured as a Requirement of the DCO. The LEMP should cover all GI assets associated with the onshore scheme, including landscape planting, habitat creation and enhancement, green corridors, buffers and any Sustainable Drainage Systems (SuDS), and apply for a minimum period of ten years post-construction (excluding BNG which will have separate requirements), or longer where required to ensure successful establishment and function.

The LEMP should demonstrate that GI has been designed and will be managed as integral infrastructure, with clear arrangements for long-term responsibilities, funding, monitoring and reporting, to ensure the continued delivery of biodiversity, landscape, drainage and climate resilience benefits throughout the operational lifetime of the development. This level of detail is necessary to ensure that GI commitments relied upon within the Environmental Statement are capable of being delivered and maintained in practice.

Draft DCO Requirement (for reference)

No part of the onshore works comprising the onshore cables or Converter Station shall commence (excluding site investigations) until a detailed Landscape and Ecological Management Plan (“LEMP”) for that part of the authorised development has been submitted to and approved in writing by the relevant planning authority, in consultation with Essex County Council.

3. Approach to Alternatives

ECC notes that Chapter 3 explains the staged approach to site selection and the identification of reasonable alternatives, including the reliance on National Grid’s East Anglia Connection Node (EACN) and the interaction with other nationally significant energy infrastructure. In particular, the Scoping Report identifies Five Estuaries Offshore Wind Farm (consented) and North Falls Offshore Wind Farm (awaiting Secretary of State decision scheduled for the 14 May 2026) as relevant projects influencing the cumulative context and constraints around the EACN.

While the Council recognises that it is currently expected that these offshore wind farm projects will proceed, it is considered appropriate and proportionate, within the Approach to Alternatives, for the Environmental Statement to also test a scenario in which one or both of these schemes do not come forward. Although such an outcome may appear unlikely at present, it represents a plausible alternative future baseline that could materially affect the appraisal of reasonable alternatives for the siting of the Tarchon Converter Station.

In this context, the Environmental Statement should explain whether, in the absence of the Five Estuaries and/or North Falls projects and their associated onshore infrastructure, the land identified for joint or co-ordinated infrastructure in proximity to the EACN would represent a better or worse option for the Tarchon Converter Station when compared with other sites considered within the defined area of search. This should focus on how the relative advantages or disadvantages of sites change under different future scenarios, having regard to environmental constraints, cumulative effects, land use, and mitigation requirements.

This request does not seek assessment of speculative substitute developments, nor does it seek to re-open the strategic need for the project. Rather, it is intended to ensure that the alternatives appraisal is robust and transparent, and that the reasons for selecting the preferred Converter Station site remain sound whether other major infrastructure projects in the vicinity proceed or not. The assumptions underpinning any future baseline scenario used for the alternatives assessment should be clearly stated and justified within Chapter 3 and cross-referenced, where relevant, to the cumulative effects and topic-specific assessments.

This should be consistent with the scenario testing/sensitivity approach described under Chapter 32.

In considering alternative approaches and locations for the Proposed Development, it is important that the Applicant has due regard to the Essex Local Nature Recovery Strategy (LNRS) and its associated mapping. The LNRS provides the strategic framework for nature recovery across Essex and identifies areas where development should seek to avoid impacts, minimise harm, or contribute positively to biodiversity enhancement.

As part of site selection, routeing and design evolution, it is recommended that the Applicant consults the LNRS mapping, in particular the Areas of Particular Importance for Biodiversity (APIBs) and Strategic Opportunity Areas, to inform decision-making and mitigation. This approach would support compliance with LNRS priorities and help to avoid habitat fragmentation or disturbance.

The Essex [LNRS mapping](#) identifies:

- APIBs, including internationally, nationally and locally designated sites; and
- Strategic Opportunities for habitat creation and enhancement, including woodland, grassland, scrub, freshwater (standing water and river buffers), and coastal habitats,
- As well as wider potential opportunity areas.

Based on the English Onshore Scheme scoping boundary (Figure 1-4), the red line boundary is shown to fall within or adjacent to LNRS-mapped APIBs, including, SSSIs, SPAs, SACs, Ramsar sites, National Nature Reserves, coastal saltmarsh and Local Wildlife Sites. It is anticipated that the EIA/ Environment Statement will provide greater detail regarding the nature and significance of potential effects on these receptors, as set out in Chapter 10: Onshore Biodiversity. The EIA should clearly demonstrate how LNRS considerations have informed the selection of alternatives and how impacts on biodiversity have been avoided or minimised in accordance with the mitigation hierarchy.

The Applicant should also demonstrate how mitigation and enhancement proposals align with LNRS strategic priorities, particularly where opportunities have been identified for grassland, scrub, freshwater (standing water and river buffers), coastal and woodland habitat creation or enhancement. Where impacts are unavoidable, biodiversity measures should be appropriately located and designed to support wider ecological networks and contribute to nature recovery objectives.

It is welcomed that consideration is being given to the use of underground cables for the English onshore scheme, in order to minimise impacts on landscape character, visual amenity and local communities in Essex. The precise point of connection to the National Grid East Anglia Connection Node substation is yet to be confirmed and should be assessed within the context of cumulative impacts from other NSIP projects coming forward, as mentioned. The EIA should therefore consider opportunities for coordination and alignment with other schemes to minimise cumulative effects on GI, biodiversity and local communities.

4. Approach to Consultation

ECC supports the continuation of public consultation with the affected local communities.

The area is under significant development pressure with the collocated Five Estuaries, North Falls and Norwich to Tilbury (EACN) substations, all of which represent a significant and lasting impact on this quiet rural area.

Alongside the existing physical newsletter, press and radio advertisements which are key for residents who do not have reliable internet provision. ECC also advocate that Tarchon utilise a dedicated social media platform alongside their website to share information and raise awareness. For the next stage of public consultation, ECC recommends model replicas of the interconnector, these would be of great benefit to assist the local communities in understanding of the proposal.

The applicant has also been advised to have early engagement with the blue light services.

5. Legislative and Planning Policy Context

Legislative Context

The Environment Act 2021 is referenced within the Scoping Report primarily in relation to Biodiversity Net Gain (BNG). While it is welcomed that a BNG Assessment will be undertaken, the Environment Act 2021 should be recognised more broadly as a key legislative framework that underpins the Proposed Development.

The Act introduces legally binding targets and duties in relation to biodiversity, nature recovery, and the enhancement of the natural environment. In particular, it establishes the statutory basis for LNRS and strengthens the expectation that development proposals contribute to strategic nature recovery outcomes, not solely through measurable net gain but through the protection and enhancement of ecological networks and GI. As such, the EIA and Environmental Statement should demonstrate how the Proposed Development has been designed and assessed in a manner that responds to the overarching objectives of the Environment Act, beyond compliance with BNG requirements alone.

Local Planning Policy, Guidance and Other Relevant Strategies

The EIA and ES should clearly reference, review and demonstrate due regard to the following local strategies and plans:

- Essex Green Infrastructure Strategy (2020)
- Essex GI Standards (2022)
- Essex Local Nature Recovery Strategy (2025)
- Essex Shoreline Management Plans
- Relevant local green infrastructure policies and strategies where applicable.
- National level – Natural England's Green Infrastructure Framework

ECC recommends that the Essex Green Infrastructure Strategy (2020) and Essex Green Infrastructure Standards (2022) are considered as part of the EIA process. It is welcomed that these documents are referenced and considered as part of Chapter 10: Onshore Biodiversity. These documents provide an evidence-based framework for the protection, enhancement and creation of high-quality, multifunctional green infrastructure across Essex. The Strategy sets out a clear vision and objectives for delivering a connected network of green spaces that support biodiversity, climate resilience, healthy lifestyles and community wellbeing. The GI Standards complement this by outlining nine core principles to ensure that green

infrastructure is planned and delivered in an integrated, consistent and high-quality manner within new development.

Applying these documents within the EIA and ES will assist in identifying potential impacts on existing green infrastructure assets, understanding cumulative and long-term pressures, and securing appropriate mitigation and enhancement measures. It will also help ensure that the Proposed Development contributes to sustainable, inclusive and resilient outcomes that align with ECC policy and best practice.

The Essex LNRS is a key consideration and should be fully embedded within the EIA. As a statutory strategy prepared under the Environment Act 2021, the LNRS identifies priority habitats, important biodiversity areas and strategic opportunities for nature recovery across the county. The EIA should demonstrate how LNRS priorities and spatial mappings have informed site selection, routeing, alternatives assessment, mitigation and enhancement proposals, ensuring that the Proposed Development supports wider nature recovery objectives and avoids undermining the integrity and connectivity of ecological networks.

The Essex Shoreline Management Plans are also relevant in the context of coastal and estuarine processes, flood and coastal erosion risk, and long-term adaptation to climate change. Where the Proposed Development or associated infrastructure interacts with coastal or estuarine environments, the EIA should demonstrate alignment with the long-term policies and objectives set out within the relevant Shoreline Management Plans.

National Planning Policy Framework

The EIA and ES should also demonstrate clear alignment with the National Planning Policy Framework (NPPF) (2024), particularly those policies that relate to sustainable development, climate change resilience, GI and the natural environment.

ECC highlights the relevance of, but not limited to, paragraphs 8(c), 20(d), 96(c), 156(c), 159, 164(a), 188 and 199, which collectively emphasise the importance of protecting and enhancing the natural environment, delivering well-designed and multifunctional green infrastructure, addressing cumulative impacts, and supporting biodiversity and ecological networks at a strategic scale.

Consideration of these national policies, alongside local and sub-regional strategies, is essential to ensure that the Proposed Development is supported by a robust planning policy appraisal and that environmental effects are assessed within their full legislative and strategic context.

6. EIA Approach and Methodology

Para. 6.2.4 – Given the maximum working corridor width is only 40m, the scoping extend is like 600m in width, which is disproportionately wide in comparison. ECC is doubting such extent is reasonable to be considered as the “Rochdale Envelope”.

6.3 Baseline and Future Baseline

As outlined above in relation to Chapter 3 (Approach to Alternatives), the ES should explicitly reference and respond to the Essex LNRS (2025) when defining both the baseline and future

baseline conditions for GI/habitats and biodiversity. The baseline should clearly identify LNRS priority habitats, species and opportunity areas within and adjacent to the Onshore Scheme and landfall zone, providing a strategic context for understanding the sensitivity of the receiving environment and the cumulative pressures acting upon it.

The future baseline should reflect anticipated changes in the absence of the Proposed Development, including planned or aspirational nature recovery identified within the LNRS. The ES should demonstrate how proposed GI and Biodiversity Net Gain measures have been designed to contribute to LNRS objectives, particularly in relation to habitat connectivity, ecological resilience and nature recovery. In addition, the ES should explain how decisions regarding habitat retention, creation and any off-site compensation have been informed by LNRS priorities, and where conflicts with LNRS objectives arise, provide clear justification supported by evidence of the application of the mitigation hierarchy. (JR, GI Team)

Table 6.4 – definition of “Medium” Magnitude of Change Criteria: What is the definition of “UK Scheme footprint”? If the level change is greater than the whole onshore elements in the UK, this could not be classified as medium magnitude. The applicant should re-define the levels of criteria as there would be significant gap between the small to medium magnitude. It is also unclear what classified as “regional level loss” under “Large”, whether regional is referring to within the Tendring district administrative area or East Anglia, or European region.

7. Ground Conditions and Contamination

Minerals and Waste Planning Authority (MWPA) comments

Whilst recognising that some of the matters raised below are not related to the Screening Opinion to which this response relates, this consultation provides the MWPA the opportunity to make clear that this application has mineral and/ or waste policy safeguarding implications which will need to be addressed as part of the submission of a future planning application

The MWPA welcomes the recognition made at Paragraph 7.3:2.11 that Paragraph 5.11.19 of NPS EN-1 (DESNZ, 2026a) states “*Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place*”. The MWPA further welcomes the recognition that “*Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State (SoS) should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources*”.

According to the MWPA's calculations, the Order Limits currently encompass 1,761 hectares of land designated as a Minerals Safeguarding Area and, therefore, the application is subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic

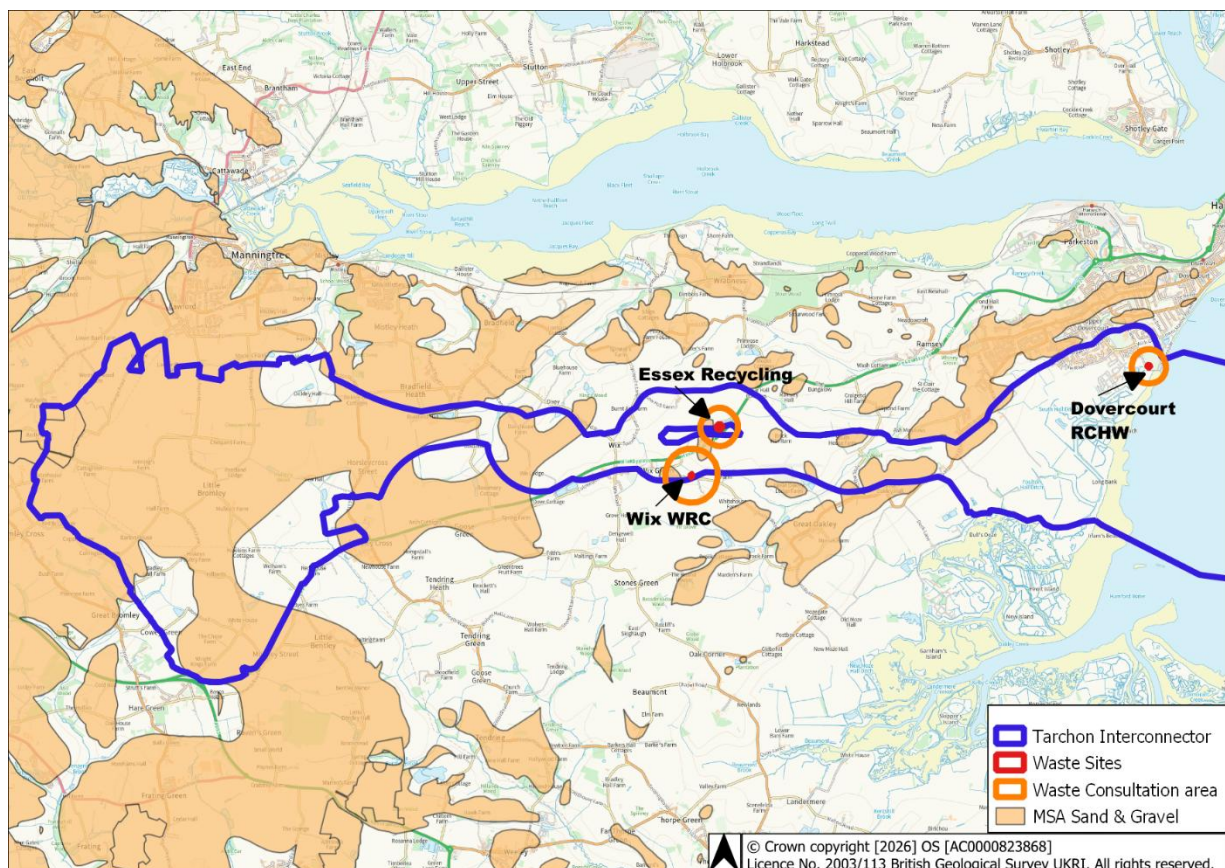
importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraph 223). The NPPF requires policies that encourage the prior extraction of mineral where it is practical and environmentally feasible.

The area of land associated with the proposed development that lies within an MSA for sand and gravel exceeds the 5ha threshold upon which local resource safeguarding provisions are applied for this mineral. This threshold is defined in Policy S8 of the MLP, and this states “... Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development or Preferred Mineral site allocation shall be opposed.”

Therefore, a Minerals Resource Assessment (MRA) would be required as part of a future planning application to establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised where this can be avoided. If found to be practical and environmentally feasible, prior extraction is expected to take place ahead of sterilisation by non-mineral development.

Whilst it is accepted that not all of this land currently set out within the Order Limits will be developed, there is the expectation that the final route will, in accordance with the provisions of NPS EN-1, seek to safeguard as much of the underlying mineral resource as possible, including adopting final routing and development configurations that sterilise as little of the mineral as possible in those areas where prior extraction of that mineral is not practical.

The relationship between the sand and gravel MSA and the application site is shown below:



The scope and level of detail of a MRA will be influenced by the specific characteristics of the site's location, its geology, and the nature of the development being applied for. However, a number of key requirements have been identified which are likely to satisfy the MWPA that the practicality and environmental feasibility of prior extraction have been suitably assessed in the MRA. The detail to be provided should be in proportion to the nature of the proposed application. The MWPA welcomes early engagement to clarify the requirements of MRA. The MWPA recognises that the normally requested sampling techniques to inform an MRA are not practical given the size of the proposed development. It is also recognised that prior extraction outside of where land is currently being worked or has been put forward for allocation is also unlikely given the anticipated linear form of the development. It is therefore important that the scope of the MRA is agreed with the MWPA prior to commencement. Recognition of this need at Paragraph 7.4.1.4 is welcomed.

MRA Section	Matters to Cover
Site location, relevant boundaries, timescale for development	Application area in relation to MSA/MCA Description of development including layout & phasing Timescale for development Whether there is any previous relevant site history – this could include previous consideration of site or adjacent land in preparation of Minerals Local Plan, any previous mineral assessments and market appraisals, boreholes, site investigations, technical reports and applications to the MWPA for extraction.
Nature of the existing mineral resource	Type of mineral Existing mineral exploration data (e.g. previous boreholes in area) Results of further intrusive investigation if undertaken Extent of mineral – depth & variability Overburden – depth & variability, overburden:mineral ratio. To be expressed as both actual depths and ratio of overburden to deposit, as well as variation across the site. Mineral quality – including silt %/content and how processing may impact on quality. Consideration should give given to the extent to which the material available on site would meet the specifications for construction. An assessment of the amount of material that would be sterilised (whole site area) and could be extracted (following application of any required buffer zones). Estimated economic/market value of resource affected across whole site and that which could be extracted.
Constraints impacting on the practicality of mineral extraction (distinct from	Ecology designations, Landscape character, Heritage designations, Proximity to existing dwellings,

those that would arise from the primary development)	Highways infrastructure, Proximal waterbodies, Hydrology, Land stability, Restoration requirements, Effect on viability of non-minerals development including through delays and changes to landform and character, Utilities present etc. Constraints should be assessed in light of the fact that construction of the non-minerals development would be taking place e.g. landscape issues are to be presented in light of the final landscape likely to be permanent built development. It is held that mitigation methods employed as part of the construction of the non-minerals development may also facilitate prior extraction at that locality.
Potential opportunities for mineral extraction at location	Ability of site to incorporate temporary mineral processing plant, Proximity to existing mineral sites or processing plant, Context of site and mineral within wider mineral resource area, Proximity to viable transport links for mineral haulage, The potential for indigenous material to be used in the construction of the proposed development, thereby reducing/removing the need for import, Potential benefits through mineral restoration e.g. land reclamation, landscape enhancement, Any opportunities for ancillary extraction as part of the primary development of the site such as foundations, footings, landscaping, sustainable drainage systems, Evidence or otherwise of interested operators/local market demand.
Conclusion (as relevant to the findings)	Whether mineral extraction at the site would be practical, based on conclusions of a competent person, Whether prior extraction is practical at the site in the context of the non-mineral development, taking into account the estimated value of the mineral, restoration and the viability of the proposed development, How the MRA has informed the proposed non-mineral development, If prior extraction is not practical, the justification for sterilising the mineral, If prior extraction is practical, how this will be phased as part of, or preceding, the non-mineral development, Whether prior extraction is environmentally feasible, Whether the site has the potential to be worked for mineral in the future.

An MRA is expected to be evidence based and informed by quantified information.

To ensure that a comprehensive assessment of the mineral resource at risk of sterilisation is undertaken, it is recommended that:

- Any questions regarding the scope of an MRA are discussed with the MWPA as early as possible;
- a draft borehole location plan is agreed prior to commencement, and preferably as part of pre-application;
- the borehole depths should be sufficient to prove the depth of the safeguarded deposit;
- borehole analysis must note the depth of the water table;
- a non-stratified sampling technique is applied. An initial spacing of approximately 100m-150m centre to centre should be considered, with additional locations if required to determine the extent of deposits on site; and
- The MRA provides documented evidence confirming any commercial interest in working the resource at risk of sterilisation based on its quality, quantity, and viability of prior extraction.

The MRA should be prepared using the Pan-European Standard for the Public Reporting of Exploration Results, Mineral Resources and Minerals Reserves (PERC) which was revised and published on 1 October 2021.

Any application, through a MRA or otherwise, is required to be submitted with sufficient information such that the issues raised through Policy S8 of the MLP can be appropriately considered. The MWPA would expect the MRA to set out the extent that issues of mineral sterilisation have impacted on the final proposed route in conformity with the above stated provisions of NP-EN1.

The MWPA further expects the future MRA to quantify the extent of mineral bearing land, in hectares, that would be sterilised by the proposed development. This would be achieved by calculating the extent of land that would be objected to for mineral extraction due to the need for stand-offs from infrastructure related to the final development. The MRA can then set out how minimisation of this impact has been sought.

It is assumed that an MRA will be produced when the final route is proposed or at least at such a time where the current extent of the Order Limits will be, it is assumed, narrowed as certainty of the final route increases.

The MWPA would like to take this opportunity to note that the quantity of mineral sterilised by the Project being insignificant in the context of the extensive occurrence of sand and gravel within the County and the national need/significance of the Project.' is not an appropriate conclusion. The MWPA notes that abundance is not a material consideration when assessing whether best use has been made of finite resources as required by NPPF, and NS-EN1 is clear for the need to reduce impact rather than ignore impact on the basis of local abundance.

With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring

developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the MLP defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same.

The application site does not pass through a Mineral Consultation Area (MCA) and therefore, a Mineral Infrastructure Impact Assessment (MIIA) would not be required as part of a planning application on this site.

Groundwater Risk Assessment

While aquifers and Source Protection Zones (SPZs) are identified, the methodology relies heavily on desk-based data at scoping. The ES should clearly explain when and how quantitative or semi-quantitative groundwater risk assessment will be triggered, particularly for:

- Converter station foundations,
- substantial dewatering, and
- works near Secondary A aquifers or SPZs.

Land Contamination

ECC reasonably expects:

- clearer commitment to early intrusive investigation at preferred converter station sites; and
- clearer linkage between:
 - risk classification and
 - likely remediation approaches (without pre-judging).

The ES should set out clear triggers for Phase 2 investigations and remediation design, not just defer entirely to post-consent strategies.

8. Water Environment

All information associated with surface water drainage should be included as part of the DCO application. There is no need for additional drainage information to be supplied as part of an EIA. However, the Study Area (including 500m buffer) and the “secondary” Study Area, consist of various water bodies/ponds as well as multiple parcels of land identified with low, medium or high risk of surface water flooding. These should be addressed in the Outline Drainage Strategy on how these will be managed and how the flows connected to the watercourse(s) will be managed. The strategy must evidence that the proposed development will not increase flood risks and surface water flooding elsewhere.

Para. 8.3.4. - We strongly recommend that GI and SuDS are designed together to maximise multifunctionality and deliver multiple benefits. This integrated approach helps manage surface water, reduce flood risk, enhance biodiversity, and provide amenity value. GI and SuDS proposals should align with the Essex SuDS Design Guide and policies set by the Lead Local Flood Authority to ensure best practice. It is welcomed that the Essex SuDS Design

Guide will be a material consideration. The Applicant is encouraged to refer to the Essex SuDS Design Guide for further guidance.

9. Land Use, Soils and Agriculture

Para. 9.6.1.9 - ECC welcomes the inclusion of a detailed Soil Management Plan, careful reinstatement of the disturbed agricultural land is crucial to ensuring the land can be returned to its original ALC.

Para. 9.7.1.8 - ECC requests that Tarchon include an EMF explainer section on the project website setting out the potential effects of EMFs. A lack of information has previously caused public concern on this topic. Given the ALC survey of reinstated land (9.7.1.7) is undertaken 5 years post restoration, this would present an opportunity to establish any correlation between the underground cables and soil performance against the established baseline. ECC propose that this is included in the SMP, this does not impact the operational activities being scoped out.

10. Onshore Biodiversity

We have reviewed the submitted Tarchon Interconnector Project EIA scoping report, particularly Volume 02 Onshore Environment Rev 01 Chapter 10 Onshore Biodiversity and Chapter 23 Ornithology (APEM, April 2026) in relation to the proposed English Onshore Scheme (EOS) for this NSIP. We note that the EOS overlaps with the UK Marine Scheme at the proposed UK landfall on the Tendring coast. We note that scoping for all potential ornithology impacts (and potential subsequent effects) is covered in Volume 04, Chapter 23: Ornithology.

Baseline Information

We note from the EIA scoping report Vol 6 Annex A10-1 that the ecology desktop assessment has been prepared in consultation with the Essex Field Club and these records inform the survey requirements. Protected and Priority species as well as B-Lines & Important Invertebrate Areas identified in relation to the search area will need to be considered adequately. Records from new or updated surveys undertaken should be shared with the local record centre. Please note that the Essex UKBAP has been archived and s41 Priority habitats & species need to be referenced as such in the ES.

We support the preparation of the desktop study using biological data from new or updated surveys undertaken should be shared with any other relevant local record centres. We highlight the need to refer to Priority habitats and species in order for the LPA to demonstrate compliance with its biodiversity duty under s40 of the NERC Act (as amended) and the strengthened duty to conserve and enhance biodiversity.

Potential Impacts

This proposed project could impact on designated sites including internationally designated sites (SPA, SAC & Ramsar sites), nationally designated (SSSI) and non-statutory designated sites e.g. Local Wildlife and Geological Sites (LoWS and LoGS), as well as ancient woodland,

veteran trees and wood pasture & parkland (irreplaceable habitats). We highlight that Local Sites are referred to in Essex as Local Wildlife Sites (LoWS) not Sites of Importance for Nature Conservation (SINCs) and request that the text using SINCs is updated for the Preliminary Environmental Information Report (PEIR) including Table 10 -3. We note that para 10.5.7.3 states that “All ancient woodlands will be avoided where possible to prevent direct impacts and mitigation measures will be put in place in order to seek to avoid all indirect effects on ancient woodland”. We highlight that, in line with Government Standing Advice, the ES will need to justify any impacts on irreplaceable habitats and demonstrate that there is no alternative before a bespoke compensation package would be tenable.

The EIA scoping report at para 5.5.1.1 acknowledges that the Tarchon Interconnector Project will trigger a Habitats Regulations Assessment to consider the likely impacts on Habitats sites on the Essex Coast. We support confirmation that applicant will therefore submit a Report to Inform Appropriate Assessment (RIAA) with the DCO application. Any compensation for impacts on designated sites (as part of the National Site Network) should be identified in sufficient detail to ensure the package is appropriate, deliverable and adequately secured. This should be secured by a legal obligation e.g. s106 or for enhancements, by an upfront payment under s111.

Without a strategic “Delivery Plan” agreed by the LPA prior to the end of the examination, we maintain that there needs to be certainty of likely ecological impacts with compensation before the ExA makes its recommendation on this dDCO to the SoS. We therefore do not consider that a financial contribution is appropriate in lieu of a known compensation package for this NSIP.

The majority of the project passes through arable farmland with a large number of species-rich hedgerows. The project needs to be planned to avoid impacts on these Priority habitats by direction drilling and buffer zones particularly where Hazel Dormouse is likely to be present as records will trigger Important Hedgerow status. We highlight that this was the case for the North Falls OWF DCO. Reasonable mitigation measures have been identified for the construction process which will need to be secured by a condition of consent.

The submitted ecological chapter for the PEIR will need to consider the potential impacts on all relevant protected and Priority species – not just notable species – and aim to avoid impacts before identifying mitigation and any compensation as the project design is developed. This is necessary for the Local Planning Authority to demonstrate they have met their strengthened s40 biodiversity duty to conserve and enhance biodiversity as set out in paragraph 4.6.6 of NPS EN-1.

Methodology

In accordance with Regulation 14 of the EIA Regulations, the Environmental Statement should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

We welcome the inclusion of decommissioning within the scope of ecological assessment. We are satisfied that nationally agreed guidelines will be followed for the ecology surveys and all survey work has been undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species should meet the

requirements of Natural England Standing Advice and meet the requirements of Overarching National Policy Statement (NPS) for Energy EN-1.

We recommend that footprint tunnels are also included within the survey methods for Hazel Dormouse as this European Protected Species is known to be within the Study Area at very low levels across the landscape. This new survey method is included in the 3rd Ed Hazel Dormouse Conservation Handbook (2025).

Any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.

Opportunities

To comply with NPPF, there is an opportunity to enhance the corridor, to deliver net gain for biodiversity. The EIA should thoroughly explore all reasonable options to enhance the development for protected and Priority species and meet the requirements of mandatory biodiversity net gain.

Although the EIA scoping report refers on paragraph 5.5.1.1 to mandatory BNG being expected to apply to all NSIPs submitted from May 2026, we note that the Government have announced that this would come into force in July 2026. We highlight that, where Natural England advises that, for consistency, everything within the Red Line Boundary (Order Limits) should be included in the BNG baseline calculations, including any retained habitats. We would therefore advise that the Tarchon Interconnector project is consistent with the BNG approach as taken by Five Estuaries NSIP. Natural England also advises that where the long-term management of hedgerows for the 30-year period cannot be secured, this should be treated as “habitat loss” within the BNG metric. Once BNG is mandatory, then a legal agreement would be required to secure the management for thirty years where habitats will be lost. The BNG document needs to reflect this commitment unless different requirement for mandatory BNG is in place at the time a decision is made on the DCO.

Conclusion

We agree with the EIA scoping where Biodiversity is scoped in e.g. for construction & decommissioning, and scoped out for operation, and where further assessment needs to be provided within the Environmental Statement.

In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non-EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by DCO requirement.

The application should therefore offer reasonable biodiversity enhancements for protected and Priority or threatened species are also secured to deliver net gains for biodiversity, as outlined under Paragraphs 187d of the National Planning Policy Framework December 2024. The reasonable biodiversity enhancement measures could be provided upfront within the application or outlined within a Biodiversity Enhancement Strategy to be secured as a condition of any consent. The design of the proposed Converter Station should include integrated bird and bat boxes to ensure they are permanent.

It is welcomed that the EIA will consider impacts on designated sites, including Local Wildlife Sites, and recognise the role of wider ecological networks such as B-Lines. The intention to use trenchless construction methods where practicable, and to utilise existing gaps in hedgerows, is also welcomed as a means of minimising habitat loss and fragmentation. It is noted, however, that despite these measures some temporary disturbance may still occur during construction, and this should be clearly identified within the ES alongside appropriate mitigation and reinstatement proposals.

It is noted that the Applicant intends to deliver the forthcoming statutory minimum requirement of 10% BNG in line with the Environment Act 2021. While this approach is acknowledged, given the scale of the Proposed Development, the ES should explore opportunities to deliver BNG in excess of 10% where feasible. The scope of BNG delivery should also be clearly defined, including whether opportunities exist beyond the Converter Station site across the wider Project area. Any off-site BNG provision should be justified and aligned with the Essex Local Nature Recovery Strategy. A Biodiversity Gain Plan will be required, setting out baseline habitat values, predicted losses and gains, and delivery mechanisms.

While a standalone Green Infrastructure strategy is not proposed due to the largely temporary nature of the works, ECC advises that the ES should nevertheless provide sufficient landscape and ecological information across the whole Project, through detailed Landscape/GI Plans. This should clearly demonstrate how existing habitats and GI assets will be retained, how areas of temporary disturbance will be reinstated, how replacement or enhanced habitats will be delivered and managed and how they will be coherently connected across the site through appropriate mechanisms such as the Outline or Detailed LEMP.

11. Onshore Archaeology and Cultural Heritage

The proposed scheme has potential to have a considerable impact on the historic environment and especially the archaeological and geoarchaeological deposits within Tendring District, both onshore and offshore.

The Tendring District is particularly rich in prehistoric ritual remains which range from single monuments to extensive cemetery areas. Non-designated heritage assets include a number of cropmark sites identified through aerial photography. Many of these have not been investigated through archaeological fieldwork and remain undated. Relatively little archaeological fieldwork has taken place within the area of the proposed development to inform on the nature, extent and significance of the known heritage assets.

The proposed cable route will cross almost 20km of land within the Tendring District including the intertidal zone and seabed, and there is high potential for currently unknown archaeological and geoarchaeological deposits of high significance to be located within the area of the proposed cable route and associated works.

Chapter 11 is supported by a Gazetteer based upon data from the Essex Historic Environment Record (HER) (Tarchon Interconnector Project Environmental Impact Assessment Scoping Report Volume 06, Annex 11-1: Gazetteer of Known Designated and Non-designated Assets (April 2026)).

Baseline Information

The study area used for the baseline data is sufficient for scoping purposes.

Designated heritage assets are illustrated in Fig 11.2. This shows two scheduled monuments (SM) located within the study area. The Little Bromley SM (Cropmarks of a Neolithic henge, Bronze Age round barrow cemeteries and Iron Age or Romano-British enclosures 510 m south-west of St Mary's Church, Little Bromley. ID:1489898) was recently designated. This site should be excluded from any physical development impacts. The site is identified through aerial photographic evidence and although no above ground remains are visible, setting should be considered within the ES in addition to the WWII SM (Heavy anti-aircraft gunsite 350 m north-east of Little Oakley Hall. ID:1019486) where above ground remains do survive.

Non-designated heritage assets are illustrated in Fig.11.3 and provide an indication of the potential for extensive archaeological remains within the development boundary.

The baseline information is sufficient for scoping purposes for archaeology.

The baseline assessment does not include any consideration of geoarchaeological deposits, such as the interglacial deposits at Little Oakley which is protected as a SSSI. The significance of any Palaeolithic remains would be very high. As the depth of impact of the proposed cable trenches could impact geoarchaeological deposits across the scheme, the impact on these will need to be assessed for the EIA. The geoarchaeological potential would extend through the intertidal zone and offshore. The continuation of palaeogeographic sites from onshore to offshore needs to be considered by both onshore and offshore assessors.

Geophysical surveys carried out for Five Estuaries/North Falls Windfarms has identified potential deposits/sites of geoarchaeological value offshore. The potential for early prehistoric discoveries would be regarded as of national importance, above or below the seabed.

The EIA will need to include an assessment of the Protected Lanes within Tendring. At least 3 Protected Lanes are located within the study area. These will need to be scoped in and assessed as part of the EIA.

Additional proposed data sources used to inform the ES and its baseline are listed in 11.5.3 and agreed. An updated HER search will need to be requested and the NMP data acquired from the HER will require rectification for greater locational accuracy.

Methodology

The EIA will follow the general approach outlined in Volume 01, Chapter 06: EIA Approach and Methodology, and will consider the construction, operational and decommissioning phases of the English Onshore Scheme (EOS).

For archaeology, the construction phase will be the main impact through the extensive groundworks proposed. This has potential to lead to the removal or disturbance of the archaeological resource over an extensive area.

In order to apply EIA methodology effectively for archaeological remains, they need to be fully assessed so that heritage significance and value can be determined and assigned. This can only be confidently achieved through intrusive evaluation methodologies.

Potential impacts

The report identifies potential permanent effects to buried archaeological remains through damage or removal at construction phase. No impact is identified to archaeological remains during operation or decommissioning. The elements scoped in as listed in Table 11.6 are agreed.

Impacts are identified at EOS landfall, Cable route and the Converter station. The most extensive impact will be within the areas of open cut trenches across the northern half of the Tendring peninsula. The EOS will use a combination of cable technology, requiring between 5km and 20km length of cable corridor(s) with a 40m working width and up to 2m depth. Direct effects to archaeological remains from physical damage or disturbance will be incurred within the footprint of the proposed development and associated enabling works. Any adverse impact to buried archaeological features as a result of the implementation of the project would be permanent and irreversible in nature.

An assessment of effects on any heritage asset involves an understanding of the heritage significance of an asset, with regard to subsurface archaeological remains, this can only be confidently achieved through intrusive investigation such as a programme of trial trenching. The proposed embedded mitigation is avoidance of key areas of sensitivity based on the results of desk-based studies and geophysical surveys. This can only be achieved through the identification of archaeologically sensitive areas. For geophysical survey to be determined a reliable and consistent method of detecting archaeological remains, it would require an element of ground-truthing through intrusive evaluation methods.

The proposal is located in a sensitive area for the historic environment and the effects of the scheme could potentially be significant. Currently there is a large amount of data from the HER where the significance cannot be fully determined due to lack of intrusive investigation. Evaluation will be required to determine the heritage significance and therefore degree of harm to archaeological remains.

Cumulative effects

The cumulative effects assessment should consider the impact on the archaeological resource with the other NSIPs within the Tendring District such as Norwich to Tilbury, Five Estuaries and North Falls Offshore windfarms, some of which overlap in development boundaries and all of which will result in the potential loss of the archaeological resource.

Conclusion

We agree with the EIA scoping where Archaeology is scoped in for construction, and scoped out for operation and decommissioning, and where further assessment needs to be provided within the Environmental Statement.

As part of the archaeological assessment geoarchaeology should also be given greater consideration and a separate geoarchaeological DBA is recommended, this should be carried

out in conjunction with any offshore archaeological assessment to ensure complete coverage from onshore to offshore. Any Ground Investigation data or offshore data that is acquired as part of the EIA should be made available for this assessment. Protected Lanes will also need to be included in the assessment.

The applicant proposes a staged approach for archaeological evaluation and it is understood that, at present, the scoping boundaries are intentionally broad to provide design flexibility at this early stage. To ensure that a sufficient level of information is provided for the ES, it is recommended that aerial rectification, geophysical survey and trial trench evaluation are carried out to provide sufficient data to help inform on the design of the scheme as well as assessing potential impacts. This would ensure compliance with EN 1 section 5.9.

Cultural Heritage (Built Heritage)

Environmental impacts and assessment scope

The Converter Station is likely to have considerable impacts on the settings of nearby built heritage assets due to its scale and form and the change to the character of the landscape. The impacts are likely to result in harm to their significance. The cable route is unlikely to harm the significance of built heritage assets at operational phase, but there may be temporary harmful impacts during construction phase arising from change within their settings.

A 500m study area is proposed for the assessment of heritage assets, however, around the site of the Converter Station, it is proposed to widen this study area to 5km because of the area's relatively flat topography, open landscape and the scale of the proposed structures which could be visible over large distances. This approach is supported.

Viewpoints to illustrate impacts on the landscape and will be provided within the LVIA. It is recommended that heritage-specific viewpoints are considered and included in the assessment of built heritage assets to properly assess and illustrate the impacts of the proposal on heritage assets specifically as there are different considerations (including, for example, there does not have to be public access to a heritage asset or important view of a heritage asset for its setting to contribute to its significance).

Paragraph 11.4.1.2 of the *Environmental Impact Assessment Scoping Report (Volume 02, Chapter 11: Onshore Archaeology and Cultural Heritage)* notes that Historic England have highlighted the importance of assessing cumulative effects. This also features within Historic England's *The Setting of Heritage Assets* (GPA3). There are likely to be cumulative impacts on the settings of built heritage assets due to the locations of other proposed substations (for example, North Falls and Five Estuaries) in close proximity to the potential Converter Station, and these should be assessed.

Baseline data requirements

The data sources identified in the Scoping Report are appropriate. It is also recommended that TDC's emerging Local List of locally important heritage assets (non-designated heritage assets in NPPF terms) is considered. It is not yet an adopted document, but has been compiled as part of the work on the new Local Plan.

The guidance identified is also appropriate. As the impacts on built heritage assets are going to be indirect, relating to change within their settings, so it is recommended that the assessment methodology utilises the stepped approach in GPA3.

Mitigation and monitoring considerations

The location of the Converter Station will be the key consideration in terms of embedded mitigation for built heritage impacts. Due to its scale and form, it is likely to impact the settings of built heritage assets despite the embedded mitigation to locate it in the most appropriate position, so its design and landscaping measures will also be key factors in mitigating its impact.

12. Traffic and Transport

ECC is the Local Highway Authority for the proposed area of the development, and therefore welcomes the early engagement on the project. However, there are matters in relation to the methodology that require further engagement between ECC and the applicant to agree an approach.

We request that the applicant engages with the Local Highway Authority on this detail, ahead of the publication of the PEIR.

Study Area

It is noted that the Study Area for assessment in terms of highways impacts will be subject to discussion and agreement with ECC and National Highways. This should also include impacts on the PRow network where this study area increases.

Relevant Legislation, Planning Policy and Guidance

National Policy Statement

Other relevant sections of the National Policy EN-1 to be considered and summarised in the ES include:

- Paragraph 5.14.12 sets out the types of mitigation that should be considered relating to demand management – these include consolidating trips, locating development in accessible locations, providing opportunities for shared mobility, shifting travel to sustainable modes, retiming travel outside of known peak times and rerouting to use parts of the network that are less busy.
- At paragraph 5.14.13 the policy sets out that this type of mitigation should be required before considering provision of new inland transport infrastructure.

- Paragraph 5.14.13 also covers the importance of supporting and prioritising modal shift of freight from road to sustainable alternatives, as well as making provision for supporting alternative fuels including charging electric vehicles.
- Paragraph 5.14.14 also shows that regard should be given to the needs of freight at all stages of construction including the need to provide appropriate facilities for HGV drivers as appropriate.
- Paragraph 5.14.15 suggests that the Secretary of State may attach requirements to a consent to control numbers of HGV movements to/from the site and possibly routing; make sufficient provision for HGV parking and associated high quality drive facilities either on site or at dedicated facilities elsewhere to avoid the negative consequences associated with not having sufficient facilities; and ensuring satisfactory arrangement for foreseeable abnormal disruption.
- It is also clear at paragraph 5.14.16 that if the Applicant suggests costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the SoS of any obligations or requirements needed to secure the mitigation.
- Paragraph 5.14.19 states “A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure, and the Secretary of State should therefore ensure that the Applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.”
- Importantly at paragraph 5.14.22 it states that refusal on highways grounds is only considered “if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show consideration has been given to the provision of adequate active public or shared transport access and provision.”

National Planning Policy Framework (Dec 2024, Amended on 7 Feb 2025)

The National Planning Policy Framework is a consideration in relation to Highways & Transportation impacts. The following paragraphs should be included and considered:

- Paragraph 109 states “Transport issues should be addressed from the earliest stages of plan-making and development, using a vision-led approach to identify transport solutions that support well-designed, sustainable and popular places. This should involve:
 - Making transport considerations an important part of early engagement with local communities;
 - Ensuing patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making highway quality places;

- Understanding and addressing the potential impacts of development on transport networks;
 - Realising opportunities from existing or proposed transport infrastructure and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
 - Identifying and pursuing opportunities to promote walking, cycling and public transport use; and
 - Identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”
- Paragraph 110 includes that the planning system should actively manage patterns of growth to support sustainable transport objectives. Significant development should be located where the need to travel can be minimised and genuine choice of transport modes is available. However, it is recognised that the scope for sustainable transport differs between urban and rural areas, and this should be reflected in decision-making.
 - Paragraph 114 highlights the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause nuisance.
 - Paragraph 115 sets out what should be ensured when considering development proposals:
 - Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users;
 - The design of streets, parking areas, other transport elements and the content of associated standard reflects current national guidance, including the Nation Design Guide and National Mode Design Code; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach
 - Paragraph 116 highlights that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
 - Paragraph 117 sets out how applications should include the following within the context of paragraph 116:
 - Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

- create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations

Local Planning Policy ECC Development Plan Policies (February 2011)

ECC Highway Development Management policies have been the subject of a full public consultation, together with a Sustainability Appraisal and Strategic Environmental Assessment. They have been approved by the relevant ECC Cabinet Members for Highways and Transportation and for Communities and Planning, and as such have been formally adopted as ECC Supplementary Guidance. The following are considered relevant:

- Policy DM1 is a general policy which highlights that the highway authority will ensure that: “all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies (Policies DM2 – DM5); where vehicular access is accepted in principle; the number of access points will be kept to a minimum on roads designated within the Development Management Route Hierarchy; where access is accepted in principle; new access points will be designed and constructed in accordance with the current standards; where existing access is to be used, substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road; all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network; all proposals have safe and convenient access for sustainable transport modes commensurate to its location; proposals will not create a significant potential risk or be detrimental to the safety of the highway network.”
- Policy DM2 and DM3 sets out how the Highway Authority will protect the function of various road types (as defined in Appendix A of the document for the Local Highway Network) through key design principles. It mentions that there may be exceptions to these principles where access is required for developments of overriding public, environmental, national and/or regional need. The policies also include the requirement for new access points to be designed and constructed in accordance with current standards (also included in more detail at Policy DM7: Application of Design Standards).
- Policy DM9 highlights that the Highway Authority will ensure that the development minimises the number of trips by private vehicle through provision of alternative transport modes and/or associated infrastructure. It states that alternatives to private car use are to be considered as a first principle in assessing travel impacts and that mitigation will be required through the application of comprehensive travel planning. It then lists all the relevant strategies that the development should be reviewed against– including passenger transport, cycling, walking, rail, sustainable modes for schools and colleges and workplace sustainable business.

- Policy DM11 relates to the public rights of way network and sets out how the Highway Authority will safeguard the existing network, and will require the creation of new and/or enhanced routes as well as take appropriate consideration of rights of way that are reasonably alleged to subsist where affected by development.
- Policy DM15 sets out how the Highway Authority will protect the safety and efficiency of the public highway by requiring the developer to demonstrate the impacts on existing or proposed highway and appropriate mitigation measures where necessary.
- Policy DM17 sets out how mitigation can be delivered – through implementation by the developer or agreed financial contributions.
- Policies DM19 and DM20 relate to HGV related policies which include a requirement for a routing management plan and Construction Traffic Management Plan. Specific points to be agreed with the Highway Authority are mentioned ensuring parking, turning facilities, temporary access and wheel cleaning facilities are agreed with the Highway Authority.

Essex Planning Officers Association (EPOA) Parking Guidance (September 2024)

The parking standards contained in this Guidance are intended to guide new development in relation to parking requirements in order that the appropriate balance can be achieved between securing a reduced reliance on the private car whilst allowing provision for all modes.

- Paragraph 8.2.1 of the guidance sets out that where developments do not fall into a specific land use classification (as is the case for the Norwich to Tilbury Scheme), then parking provision will be considered on the development's own merit. However, the onus will fall on the developer to demonstrate that the level of parking provided is appropriate and will not lead to problems of on-street parking on the adjacent highway network.

ECC Local Transport Plan (2011)

The Local Transport Plan ("LTP") assesses transport needs and challenges, and sets out its transport aspirations for the County over the 2011 – 2026 period.

- There are five broad outcomes that the plan sets out to achieve as follows:
 - Provide connectivity for Essex communities and international gateways to support sustainable economic growth and regeneration
 - Reduce carbon dioxide emissions and improve air quality through lifestyle changes, innovation and technology
 - Improve safety on the transport network and enhance and promote a safe travelling environment
 - Secure and maintain all transport assets to an appropriate standard and ensure that the network is available for use

- Provide sustainable access and travel choice for Essex residents to help create sustainable communities A Better Connected Essex: Essex Transport Strategy (emerging)

ECC Emerging Transport Strategy

ECC are developing a new transport strategy and undertook a second public consultation during the summer of 2025. While this strategy is not yet adopted, although it is anticipated this will be published in 2026, it shows the direction that ECC are taking in setting a vision for Essex. It has been written against the backdrop of future election for a Mayor of Greater Essex and the reorganisation of current local authorities. The plan is to cover this transition period and be used as a starting point for the development of a new Greater Essex Local Transport Plan by the new Mayoral Combined County Authority.

- There are three key themes identified as ‘Supporting people, health, wellbeing and independence’, ‘Creating sustainable places and communities’ and ‘Connecting people, places and businesses’. Out of the three key themes there are a series of activities associated with them which are summarised within the following headings:
 - People have inclusive and affordable access to key services
 - People enjoy improved physical and mental health and wellbeing
 - The transport network is safe, and feels safe for all users
 - All places support the transport needs of all residents
 - New developments are designed to be sustainable from the start
 - Transport has a reduced impact on the environment and adverse impacts on natural habitats are avoided
 - The business potential of Essex is maximised
 - People have inclusive and affordable access to employment, education and training
 - The transport network has a secure and long-term future

Consultation and Engagement

It is noted that the intention is to not provide a standalone Transport Assessment but instead prepare a Transport Assessment Note that signposts the information across other submission documents. We do not agree with this approach on the basis that the Transport Assessment is a required document under NPPF and we believe having the information contained across different documents will make it unwieldy. The main focus of the Transport Assessment is to consider impacts during the peak hours which will be important to understand whereas this is not necessarily considered in the same way through the ES. The standard approach of having a Transport Assessment which sets out traffic modelling results of junctions and impacts on all modes is used to inform the ES Transport Chapter and is considered the most effective way of assessing the application. However, we are happy to engage on this matter further to understand more detail behind the proposed approach that the applicant is suggesting as it is acknowledged that there can be a level of duplication across the various documents.

Additional Proposed Data Sources

Pedestrian/non-motorised user counts should be included on roads and PRoWs within the Study Area. This will be agreed as part of the traffic counts to be undertaken.

Construction traffic predictions should be confirmed for the whole of the construction period and not just focus on the worst case peak construction period. This is so that traffic conditions are understood for the entirety of the construction period. The assessment should consider duration as well as increases in traffic flows when reviewing impact.

Without knowing the traffic flows outside of the peak construction year it is not accepted that the future year scenario testing should just include Peak Construction Year (2030) With and Without Development. This is on the basis of the following:

- The construction period is to last until 2034 – during that period there will be further background and committed development flows on the network and the construction traffic may be high (whilst not peak construction) which would mean the 2034 scenario could show more congestion at key junctions than the 2030 scenario. In this case, the impact at the junction could be higher as when modelling congested networks the queuing starts to rise exponentially.
- “Fear and Intimidation” includes a review of total 18 hour vehicle flows which may be higher in the future year of 2034 with the extra 4 year background growth and committed development considerations.
- The peak construction is based on the indicative construction programme which may well change when the Contractor is brought on board. The programme could also possibly change due to delays or other factors outside of the control of the Tarchon Project.

Proposed Assessment Methodology

The approach set out in Paragraph 12.6.1.8 of assigning a very low magnitude of change to locations where there are fewer than 30 additional vehicle trips per hour is not agreed. It is understood that the rationale for this was to avoid over-estimating impacts with very low baseline flows (eg narrow rural lanes). The reason for not agreeing this point is on the basis that even low increases on rural lanes can have impacts that may need to be mitigated. For example, a very narrow rural lane without any footway or verge used by very few motorists but with pedestrians/cyclists/horses present where even a slight uplift has the potential to significantly impact on users.

Paragraph 12.6.1.15 sets out how effects that appear to be significant following the methodology in the ISEP guidance may be considered not significant if the effect is temporary or infrequent. We would welcome further discussion around how this will be considered as “temporary” can be subjective.

Paragraph 12.6.1.16 sets out how the trip distribution of workers will be based on a simple gravity model using 2021 Census data. Our concerns on using this method includes the following which would be worth further discussion to determine whether there are alternative methods that could be considered:

- The assumption would be that the construction workers would be living locally in Essex. Our only observation would be whether this is realistic and if a proportion of them may be from outside of the area living in temporary accommodation in nearby key towns.
- The 2021 Census Data will include all workers and may be skewed towards certain types of workers and so not take account of the dispersed nature of construction sites

Paragraph 12.6.1.19 sets out what will be included in the DCO submission. We would suggest that access and crossover designs are included so these can be agreed in principle. We would also suggest undertaking Road Safety Audits to ensure safe and suitable designs. In our experience this reduces timescales post DCO should the project get approval. It is advised that any designs relating to changes to the existing highway (whether mitigation or new access/crossovers) should include topographical survey information and highway boundary information as confirmed by ECC Highway Records team.

Please note that where there is a roadside ditch or pond, that ditch or pond (even if it has been piped or infilled) would not in the majority of circumstances form part of the highway. Often, roadside ditches, which are apparent on the ground are not indicated on the Ordnance Survey Mapping. The same applies to historic ditches. Therefore, any ditches (including historical) and ponds should be marked on the drawing to avoid any issues of land ownership and other constraints. There have been instances of DCO boundaries not abutting the highway boundary and this has caused big issues later on in the design process and deliverability of the works.

A Construction Traffic Management Plan is mentioned in the documents provided, the contents of this should be agreed with the Highway Authority.

Table 12.3

It is not accepted that the number of sensitive uses is an indicator of receptor sensitivity and so Table 12.3 is not agreed.

It is noted that Table 12.3 has no example of situations where there are narrow footways next to the carriageway which would have different impacts compared to standard or wide footways. Also, PRow crossing over construction routes are not included – these can be hazardous where they are essentially gaps in vegetation coming out onto the live carriageway.

We would suggest that the approach taken for the Norwich to Tilbury DCO for the criteria of receptor sensitivity is more reasonable and acceptable to ECC.

Severance

The guidance sets out how the thresholds are a starting point for any assessment and should be used cautiously. It further states that severance should pay full regard to specific local conditions, eg sensitivity of adjacent land uses, prevalence of vulnerable people, whether or not crossing facilities are provided, traffic signal settings etc. Therefore, we would expect a qualitative approach taking account of the above based on local conditions alongside the quantitative consideration of thresholds.

Pedestrian Delay

The guidance highlights that there are no definitive thresholds and that expert judgement is used to determine whether pedestrian delay constitutes a significant effect. It also mentions how local factors and conditions can influence pedestrian delay and gives an example of how a discrete delay may have a lesser impact in an urban environment than a rural setting.

Further useful reference resources are mentioned in assisting with the review of this topic including and should be considered as part of the assessment:

- DfT TAG Unit A4-1 Social Impact Appraisal (2021) which provides guidance on assessing the hindrance of pedestrian movements; and
- DMRB LA 112 Population and Human Health which contains sensitivity values for walkers, cyclists and horse riders based on traffic flow thresholds.

Non-Motorised User Amenity

The guidance sets out how the tentative thresholds should be a starting point for any assessment and should be used cautiously in any assessment. Therefore, we would expect a qualitative approach based on local conditions alongside the quantitative consideration of thresholds. Further useful reference resources are mentioned that should be considered in the review of this topic including:

- Transport for London's Guide to the Healthy Streets Indicators: Delivering the healthy streets approach which provides factors that influence non-motorised users travel choices
- Pedestrian and Cycle Movement within the Essex Design Guide which also references LTN1/20
- Pedestrian Comfort Guidance for London (2019) by TfL which has an accompanying spreadsheet to undertake evaluating a new design or assessing an existing footway
- Cycling Infrastructure Design Guidance webpage by Sustrans

We would also refer to Active Travel England resources.

Fear and Intimidation

As highlighted by the applicant the thresholds are indicative, and the guidance sets out how there will be a need for professional judgement. The guidance mentions special consideration should be given to areas where there are likely to be particular problems such as high speed sections of road, locations of turning points and accesses and the inherent lack of protection created by factors such as a narrow footway/footpath or a constraint such as a wall or fence. Further details include locations where people may be unfamiliar with the locale (eg beauty spots or heritage/tourist attractions) and mention of hazardous/large loads heightening people's perception of fear and intimidation. Therefore, we would expect a qualitative approach based on local conditions taking account of the above alongside the quantitative consideration of thresholds.

Driver Delay

We would expect peak hour traffic modelling from the Transport Assessment to feed into the assessment of driver delay as set out in the ES guidance. We do not accept the thresholds for the increase in traffic flow defined in Table 12.4 as it is unclear where they have been

sourced as the ES guidance does not include these in the driver delay advice. Furthermore, the % increases are very dependent on the road conditions – for example, small increases in traffic could cause significant delays where the network is congested (as identified by the applicant in their scope) but also on very narrow rural lanes where small increases can cause issues with shuttle working in passing bays. Therefore, further discussion is needed to agree an approach to reviewing driver delay.

Road Safety

We would expect the clusters to be defined based on ECC's general approach of 3 or more personal injury collisions in a 250m radius of which one must be classified as fatal or seriously injured using the ECC collisions website. We do not accept the scope at Table 12.4 for the extent of the review of road safety. It should instead be based on a review of all the defined highway routes to be agreed as part of the Study Area rather than related to the number of vehicles (as defined in the scope at Table 12.4). We note that the ES Guidance includes an alternative approach using iRAP Star Ratings protocols which should also be considered. We would welcome further discussion on this point as recommended in the ES guidance.

Table 12.4

The definitions of Magnitude of Change should not wholly relate to quantitative considerations as it is clear from the guidance that there is an element of qualitative review and professional judgement required.

It is noted that severance and fear & intimidation are based on indicative thresholds from the ES guidance which is accepted with the proviso that a qualitative approach is also taken to support the quantitative review. The other topics are not based on any thresholds from the ES guidance and are not accepted as it is unclear how they have been derived. Also, note individual comments on the thresholds in relation to Driver Delay and Road Safety above; and additional guidance under the pedestrian delay topic that may have some useful thresholds to refer to.

On the basis of the above, further discussion is needed to reach agreement on the above. However, we would suggest that the magnitude of change is based on that set out in the ES for the Norwich to Tilbury DCO which references guidance set out in DMRB LA 104, Environmental Assessment and Monitoring.

Due to the high levels of NSIP construction activities in Tendring area, ECC expects that all NSIP providers will engage in timely and productive discussions aiming for efficient collaborations to reduce the overall impact on the local communities.

Public Rights of Way (PROW)

The lack of dedicated PROW chapter / subheading locating the information has proved time consuming for the PROW team. With such broad parameters for both the Interconnector and the cable route, only general feedback is possible at this stage. For all future referencing on PROW please obtain the relevant PROW information direct from Highway Records and use Parish names as well as codes.

Any proposed permanent PROW changes should be clearly communicated in the PROW-MP with the PROW & PROW Planning team having sufficient time to assess them and, if necessary, make alternative suggestions.

The HGV route is also a likely factor for PROW impact. Many/most of the PROW within the potential affected area are in rural locations where quiet country roads provide the connection between PROW for onward walking either by crossing them or walking/riding along them (depending on status). As such ECC encourages the impact on PROW connections of the HGV route to be included in the ES.

GI should be fully integrated into the design, construction and reinstatement of the Proposed Development to support ecological connectivity, sustainable transport and access. While Chapter 10 (Onshore Biodiversity) appropriately considers the potential effects of construction traffic, dust on sites of ecological and nature conservation value and temporary PROW closures, as well as potential provision of enhancements to these transport networks (to be determined), the ES should also recognise the role of GI in supporting non-motorised users and maintaining links between open spaces, recreational routes and ecological receptors. GI should not be considered in isolation, but as part of a connected network that contributes to biodiversity enhancement, active travel, surface water management and wider environmental resilience.

In this context, ECC recommends that the EIA explores opportunities, where appropriate, to optimise PROW and active travel routes through GI enhancements alongside the Onshore Scheme. This may include green corridors along PROWs and sustainable transport routes, incorporating measures such as nature-based SuDS, native hedgerow and tree planting, where compatible with the surrounding environment. Such measures have the potential to mitigate construction impacts, support BNG and improve connectivity, while ensuring that habitat creation and GI objectives are balanced with safe, accessible routes for walking, cycling and recreation.

13. Marine Physical Environment

Essex and South Suffolk Shoreline Management Plan (SMP 8) is mentioned, and it is acknowledged that the landfall area has a range of management policies currently identified, including 'hold the line' and 'managed realignment'. There appears to be no further comment though regarding the implications of these policies for a development of this nature and scale.

The SMP indicates a preferred policy of managed realignment for the frontages where landfall has been proposed and as such, it is certainly not guaranteed that there will be public funding available to maintain the existing defence in its current location, or to its current standard. The Environment Agency have advised it would therefore be important that all infrastructure related to landfall, would need to be located outside of current and future tidal flood zones, or be made to be entirely water compatible, or otherwise that appropriate liaison is undertaken with the Environment Agency to clarify how the developer intends to fund the ongoing protection of the sea defence asset.

ECC notes that the proposed development has the potential to interact with nearshore coastal processes, shoreline evolution and existing coastal defence assets. In line with Shoreline Management Plan (SMP) objectives, the EIA should recognise that long term coastal management approaches, including “hold the line” or managed realignment, are subject to uncertainty and ongoing funding and should not be assumed to be guaranteed over the lifetime of the project.

ECC therefore requests that the scope of the EIA includes assessment of potential effects on sediment transport, seabed morphology and shoreline levels during construction, operation and decommissioning, including any interaction with existing or planned coastal defence infrastructure. Where nearshore works, cable installation or seabed disturbance are proposed, appropriate coastal and sediment process modelling should be undertaken to demonstrate that the scheme would not undermine the performance or integrity of coastal defences, nor compromise existing public investment in coastal protection. The EIA should also clearly identify relevant coastal management authorities and cross refer to flood risk and climate change assessments where applicable.

The proposal also highlights in 2.4.2.15 that some areas suction dredging will be undertaken, pumping material into the hopper of the dredging vessel. It is stated that the disposal location will be determined and assessed in the PEIR or ES and in 13.8.1.3 the assumption is stated that the disposal of this material will be locally offshore. Beneficial use of this dredged sediment should also be considered by the developer. This could benefit coastal protection and habitat restoration or creation along the Essex and Suffolk coasts. ECC should be consulted on the disposal arrangement of such material.

Chapter 14: Benthic and Intertidal Ecology

While ECC recognises that Chapter 10 Onshore Biodiversity refers to marine ecology, the landfall and intertidal zones represent a critical interface between marine and terrestrial ecological and green infrastructure networks. The Environmental Statement should therefore demonstrate how GI considerations are addressed across the marine–intertidal–terrestrial transition, particularly at the UK Landfall. This should include consideration of ecological connectivity, opportunities for habitat buffering, enhancement or restoration where feasible, and coordination between onshore GI proposals and any marine mitigation or compensation measures. GI considerations at the landfall should also be integrated with coastal processes, flood risk management and climate resilience objectives to ensure a coherent and joined-up assessment.

21. Landscape and Visual Impact Assessment

Both Councils agree with the exclusion of the UK Marine Scheme (UKMS) from the Landscape and Visual Impact Assessment.

Baseline

We find the identified LVIA study area appropriate and welcome the inclusion of Beth Chatto and land within the Dedham Vale & Suffolk & Essex Coast and Heaths National Landscapes.

It is agreed that the significant effects on Landscape and Visual receptors are anticipated to be more likely to occur within the EOS Scoping Boundary, particularly regarding the Converter Station, with potential for significance reducing with distance towards the edges of the Initial Study Area.

Initial representative viewpoint locations Figure 21-4

While we are generally satisfied with the outlined viewpoints at this stage, we would request specific viewpoints from Beth Chatto Gardens (Grade II Parks and Gardens).

As the cable route and location for the Converter Station becomes more clear, a refined ZTV will identify additional viewpoints from specific Public Rights of Way or other landscape and visual receptors that will need to be included for assessment as part of the LVIA.

Proposed methodology

We are satisfied with the proposed assessment methodology, which confirms that the LVIA will assess receptor value and susceptibility to change in order to derive the sensitivity of the identified landscape and visual receptors.

Embedded Mitigation Measures of Importance to LVIA

Table 21-6 (page 40) refers to a Design Principles Document (or Design Guide) that will set out the approach to the design of the Converter Station, alongside an Outline

LEMP, this is welcomed. We would expect the LEMP to also identify compensation measures regarding the significance of effects remaining (residual effects), where mitigation cannot be delivered or is not sufficient to deal with the significance of effects effectively.

To inform the mitigation strategy and Design Principles Document (or Design Guide), an Environmental Colour Assessment (ECA) for the converter station buildings will be required. Guidance can be found in the Environmental Colour Assessment Technical Information Note 04/2018 (<https://landscapeinstitute.org/wp-content/uploads/2026/03/18-4-Environmental-Colour-Assessment.pdf>). This will help guide decisions on the use of colour for buildings, structures, materials, hard surfaces and soft planting, ensuring the development is read in context with its surroundings and remains consistent with local landscape character. The ECA should be prepared at an early stage of the process.

We support the intention for the landscape mitigation measures from the LVIA to support the landscape strategy.

The scope of the assessment and mitigation measures should include consideration of advance planting around the Converter Station area in order to support effective landscape screening and mitigation.

Table 21-7: Elements Scoped In and Out for LVIA

While we generally agree with the elements identified to be scoped in and scoped out, we consider that historic hedgerows should be scoped in, as they form part of the landscape features and are characteristic of landscape character.

Grade II Park and Garden Beth Chatto Gardens should be scoped in for Construction, Operational and Decommissioning of EOS – Converter Station. We believe this sits within the 5km study area for the LVIA. We note that this is scoped in as part of the ‘Onshore Archaeology and Cultural Heritage’ Chapter of the future Environmental Statement (ES), but it should also be included within the LVIA.

Cumulative effects

We welcome the intention to include a cumulative effects assessment. The cumulative effects assessment should consider the converter station with the three proposed substations from the other NSIP projects.

Other landscape considerations

Below are a number of landscape considerations that although outside of the EIA Scoping request, should be considered as part of the iterative assessment, mitigation strategy and design process. With regard to construction impacts associated with the onshore cable installation, the installation of the proposed onshore HVAC cables would require the establishment of a working corridor up to 40 m wide along the cable route. This has the potential to adversely affect existing field boundary vegetation. Sensitive and valued landscape features, such as historic field boundaries, remnant hedgerows and veteran trees, should be retained and protected wherever possible. The cable route and construction methodology should therefore be reviewed, where necessary, to avoid impacts in accordance with the mitigation hierarchy.

Temporary haul roads should use of specialised systems to avoid compaction of the ground. We recommend localised landscape studies (1:2500 scale) to be undertaken for areas surrounding proposed substation.

The opportunity for the scheme to be presented to the EQRP panel at an early stage could be considered. The landscape is generally flat and open, although woodland blocks form a notable and characteristic feature. The introduction of new woodland areas as extensions to existing woodland blocks would therefore not appear uncharacteristic within this context. Such planting would help to reduce landscape and visual effects. In addition, the creation of new community woodland offers a valuable opportunity to compensate for any remaining adverse effects and deliver long-term benefits for local residents.

Bridleway and other PRow through or in close proximity to the Converter Station could be diverted to reduce visual impacts on PRow users. Opportunity to divert through new

community woodland. Offsite mitigation planting should be considered to address impacts from certain sensitive receptors.

The proposals should link mitigation landscape strategies to the Essex LNRS.

An overarching landscape masterplan and strategy to show all mitigation and off-setting/compensation and how this links up with and enhances existing green infrastructure will be required.

ECC notes that landscape and visual effects are proposed to be scoped out of the EIA and acknowledges that design mitigation for the Converter Station will be guided by a Design Principles Document, with landscape and ecological mitigation secured through the Outline Landscape and Ecological Management Plan (OLEMP).

Notwithstanding this, the ES should clearly set out how existing vegetation, hedgerows and trees will be retained where possible, how temporary construction impacts along the cable corridor will be reinstated, and how woodland screening and other planting at the Converter Station will contribute to biodiversity, habitat connectivity LNRS objectives. Sufficient illustrative information should be provided at the ES stage to demonstrate how these measures will be delivered, phased and maintained over the long term.

22. Noise and Vibration

Baseline, Receptors and Survey Design

The Council expects the ES to:

- Clearly define noise-sensitive receptors (NSRs) and provide a transparent receptor selection rationale, including the nearest residential receptors to the converter station options, landfall works, and cable corridor construction activities.
- Provide baseline survey methodology (locations, duration, metrics, seasonal/diurnal coverage) sufficient to characterise daytime, evening and night-time environments, including existing rural background conditions where low baseline noise can increase sensitivity to new converter station.
- Identify any quiet periods / high sensitivity times (e.g. night-time, weekends, exam periods where relevant) and explain how the assessment will address these.

Construction Noise Assessment (including traffic and compounds)

The Councils support scoping in construction noise and requests that the ES:

- Applies BS 5228 (Parts 1 and 2) (or equivalent recognised UK guidance) for construction noise and vibration prediction and significance, including the use of a transparent “reasonable worst case” scenario consistent with the Rochdale Envelope approach.
- Clearly explains assumptions for:

- plant type and number,
- likely working methods (open cut vs trenchless),
- durations at fixed locations (e.g. converter station build activities, HDD compounds), and
- any requirements for night-time or extended working hours
- Explicitly considers construction traffic noise where traffic movements materially increase on sensitive routes (even if detailed traffic assessment sits in Chapter 12), and cross-refers to agreed HGV routing and construction phasing assumptions.

For mitigation and control, the Councils expect construction noise to be controlled through a secured CEMP with a Noise and Vibration Management Plan (NVMP) (or equivalent), setting out:

- best practicable means (BPM),
- low-noise plant selection,
- barriers/enclosures where needed,
- idling controls,
- community liaison and advance notice,
- trigger levels and monitoring commitments for high-risk activities

Construction Vibration (including trenchless works)

The Councils request that the ES:

- Defines vibration-sensitive receptors and identifies activities likely to generate perceptible vibration (e.g. compaction, breaking, piling if proposed, HDD set-up/operations, heavy plant movements in proximity to dwellings)
- States clearly the criteria/standards that will be applied (e.g. human perception/annoyance and building damage risk criteria) and how monitoring will be deployed where predicted vibration may approach relevant thresholds
- Includes a clear approach for managing complaints and verification monitoring during high-risk phases

Operational Noise – Converter Station and Fixed Plant

The Councils agree that operational effects will likely be dominated by converter station plant and associated equipment. The ES should:

- Use a recognised industrial/commercial operational assessment approach (e.g. BS 4142) and explicitly account for:
 - tonal, impulsive, intermittent characteristics,
 - low-frequency sound where relevant,

- and penalties/character corrections where applicable.
- Commit to post-installation commissioning noise verification at agreed receptor locations, with clear procedures where exceedances are identified

Cumulative Effects – Alignment with Five Estuaries & North Falls Offshore Windfarms

The Councils strongly advise that Chapter 22 and the ES take full account of the local authority concerns raised during the Five Estuaries and North Falls DCO examinations about cumulative operational noise from multiple major electrical assets in the EACN locality.

In those examinations, ECC and TDC raised concerns regarding cumulative operational noise from the Five Estuaries, North Falls and Norwich to Tilbury substations, leading to development of a multi-party Operational Noise Complaints Protocol, including a stated position that combined noise should not exceed 35 dB externally at identified residential receptors.

Given that the Tarchon proposals are explicitly being developed in the same strategic grid connection context and cumulative environment around EACN, the ES should:

- Include a clear cumulative operational noise assessment where the converter station could contribute to combined noise levels experienced at shared receptors (whether through proximity, directionality, or propagation conditions).
- Explain how the Applicant will engage with the existing Operational Noise Complaints Protocol approach (or successor document) developed for the other schemes, and whether Tarchon will adopt/align with a shared complaint investigation and resolution mechanism where residents may reasonably experience combined effects.
- Ensure that the approach to cumulative assessment and complaint handling is practical and enforceable, rather than relying on parallel, uncoordinated project-specific arrangements

Construction Cumulative Effects and Phasing

In addition to operational cumulative effects, the Councils expect the ES to address the potential for concurrent construction activity in the wider area (e.g. interaction with other NSIPs connecting to EACN and the broader Norwich to Tilbury works), including:

- overlapping construction periods,
- multiple construction compounds,
- cumulative HGV movements and associated noise,
- and the risk of prolonged disturbance periods for the same communities.

The ES should set out how the Applicant will seek to minimise concurrent disturbance through programme coordination, liaison mechanisms, and (where achievable) sequencing of the noisiest activities.

24. Socio-economics and Land Use

ECC supports the proposal for an outline skills and employment strategy and are keen to engage with the Applicant at the earliest opportunity to develop this. ECC are actively working with the NSIP promoters with both consented and live proposals in Tendring on a Skills and Employment working group. At the appropriate stage we would welcome involvement from Tarchon. ECC expects to how the supply chain linked to the construction and (more limited) operational phases of the project will directly benefit local businesses.

Para: 24.5.3.6. Given the increase in projected workforce figures particularly in the construction sector, early engagement with ECC and TDC will ensure that the employment needs of Tarchon project can be met with the workforce being drawn from local communities.

Para: 24.7.3.4 As a result of the scoping and subsequent ES reports, ECC expects to see the use of 'non local' workforce reduced to the absolute minimum. Through partnership working we seek to maximise employment opportunities for local residents.

Table 24-2 - Please add Lawford Green and Play Area as a community facility (as shown in Table 27-4).

Table 24-6 - ECC would like all direct, on-site employment to be scoped in – not be limited to maintenance.

The ES should consider how GI measures can contribute to mitigating potential socio-economic impacts arising from the project, particularly those associated with construction activity, temporary disruption to Public Rights of Way, and changes to access to recreational environments. This should include consideration of how existing green spaces, routes and GI assets support physical activity and community access, and how these functions are maintained or reinstated during and following construction.

25. Health and Wellbeing

Essex County Council (ECC) has a statutory duty under the Health and Social Care Act 2012 to improve and protect public health. ECC Public Health recognises the strategic importance of the Tarchon Interconnector Project in strengthening the UK's energy infrastructure and supporting the transition to net zero. The Overarching National Policy Statement for Energy (NPS EN-1, paragraph 4.4.1) recognises that energy infrastructure has the potential to impact the health and wellbeing of the population, and that while access to energy is beneficial to society and to health overall, the construction, operation and decommissioning of such schemes can have direct and indirect impacts on health. It is therefore important that the Environmental Statement (ES) Health and Wellbeing chapter fully addresses the potential health and wellbeing impacts of communities in Tendring.

This response is provided by the ECC Public Health, Wellbeing and Communities Team in respect of the Tarchon Interconnector Project EIA Scoping Report (Document GBTARC-ENV-APE-AP-00042, April 2026). It focuses primarily on Volume 04, Chapter 25: Health and

Wellbeing, but also addresses the technical chapters that the health and wellbeing assessment will draw from and link to, including Chapter 12 (Traffic and Transport), Chapter 21 (Landscape and Visual Impact Assessment), Chapter 22 (Noise and Vibration), Chapter 24 (Socio-economics and Land Use), Chapter 27 (Tourism and Recreation) and Chapter 28 (Air Quality).

We welcome that the Applicant has structured the Health and Wellbeing chapter in line with the Institute of Sustainability and Environmental Professionals (ISEP, formerly IEMA) Guide to Effective Scoping of Human Health in Environmental Impact Assessment (Pyper et al., 2022) and the companion guide on Determining Significance for Human Health in EIA. We also welcome the inclusion of the Marmot Review (2010, 2020), Build Back Fairer (2020), the NHS 10 Year Health Plan (2025) and PHE Spatial Planning for Health (2017) within the guidance base. Our overall view is that a standalone Health Impact Assessment is not required for this Project, but the ES should apply ISEP guidance fully to ensure that health is addressed efficiently, with a coherent and consistent discussion of health impacts across the chapter rather than the current pattern of signposting to other technical chapters, and with mitigation commitments made elsewhere brought together in one place. Our specific comments on this point and others are set out below.

Our response is structured as follows: overarching observations on approach and methodology; comments on the baseline and study area; comments on each scoping decision in Table 25-7; comments on related technical chapters as they connect to health; comments on engagement, mitigation and monitoring; and a summary of recommendations.

Overarching observations on approach and methodology

1.1 A coherent, ISEP aligned discussion on health

Our principal observation on Chapter 25 is that the scoping rationale and proposed assessment approach rely heavily on signposting to other technical chapters rather than presenting an integrated population health discussion. For example, the scoping justifications in Table 25-7 frequently take the form “as set out in Volume 04, Chapter 22: Noise and Vibration...” or “as set out in Volume 04, Chapter 24: Socio-economics and Land Use...” without articulating the population health implication independently. ISEP guidance is clear that the population health pathway and the relevant population group should be considered in scoping decisions, not only the technical threshold under another discipline.

We do not consider that a standalone Health Impact Assessment is required for this Project. The ES Health and Wellbeing chapter should instead apply ISEP guidance fully to provide a coherent and consistent discussion of health impacts in one place, drawing on the underlying technical assessments but synthesising rather than signposting. We expect the chapter to:

- Discuss each health pathway (air quality, noise and vibration, landscape and visual, traffic and severance, employment, social cohesion, services capacity, EMF, contamination) in its own right, articulating the population health implication, the affected population groups, and the residual significance after mitigation.
- Bring together mitigation commitments made in other technical chapters, the outline CEMP, CTMP, DEMP, embedded LVIA mitigation, noise mitigation and air quality controls in

a consolidated mitigation register within the Health and Wellbeing chapter, so that the cumulative health-protective effect of the embedded mitigation can be assessed in one place.

- Apply the ISEP framework consistently to the assessment of significance; including sensitivity, magnitude and significance, with explicit reference to vulnerable population groups (see Section 1.2 below) and the wider determinants of health, rather than defaulting to the conclusions of the underlying technical chapters.
- We additionally note that the chapter records “no annexes associated with this Chapter” at paragraph 25.1.1.5 and on the Table of Contents. Given the scale of the Project, the breadth of the determinants engaged, and the volume of baseline data that will be collected, we would expect the ES Health and Wellbeing chapter to be supported by at least one annex, typically setting out detailed baseline tables (including ward and LSOA level data), the population groups assessment, and the consolidated mitigation register. The Applicant should clarify whether an annex is to be developed for the ES.

1.2 Use of WHIASU Vulnerable Groups Checklist

Paragraph 4.4.6 of NPS EN-1 expressly requires consideration of “potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.” The current scoping report references this paragraph but does not set out how vulnerable groups will be operationally identified or how differential impacts will be assessed.

We strongly recommend that the Applicant adopts the [Wales Health Impact Assessment Support Unit \(WHIASU\)](#) Vulnerable Groups (Population Groups) checklist (Public Health Wales) as a structured tool to identify groups for whom impact pathways are likely to be more pronounced.

1.3 Mental health impacts

We welcome that paragraph 25.5.2.10 acknowledges the link between physical and mental health and that paragraph 25.7.1.8 references ISEP good practice on mental health and wellbeing in EIA, including the role of community engagement as primary mitigation. The chapter recognises potential mental health pathways arising from landscape and visual change (Table 25-7), social cohesion and community identity, and from anxiety associated with the Project itself.

However, the scoping report does not propose a proportionate and structured framework for assessing mental health and wellbeing pathways. We recommend the assessment in the ES draws on the [Mental Wellbeing Impact Assessment \(MWIA\) framework](#), which provides an evidence-based toolkit organised around four protective factors for mental wellbeing: enhancing control, increasing resilience and community assets, facilitating participation and inclusion, and addressing equity and the broader determinants of mental health. Applying these factors to the Tarchon scoping decisions has practical implications for how anxiety associated with prolonged construction periods, uncertainty during the iterative design phase,

fragmentation of communities through severance, and the cumulative effect of multiple linear infrastructure schemes in close proximity (see Section 5.2 below) are assessed.

Our central concern on this point is that mental health and wellbeing should be integrated consistently throughout the ES Health and Wellbeing chapter and the linked technical chapters – not treated as a residual or secondary consideration arising only where landscape, visual or social cohesion pathways are assessed. The MWIA framework provides a structured way to demonstrate that this integration has been achieved across all relevant pathways, including air quality, noise, traffic and severance, employment and community services, in addition to landscape and visual change. We expect the ES to make this integration explicit, including in the residual effects narrative.

We further note that paragraph 25.5.2.13 reports a suicide rate in Tendring of 14.5 per 100,000 population, materially higher than Essex (9.1), the East of England (10.0) and England (10.9). Mental health is therefore not a marginal consideration in this Project area: it is a documented public health priority. The Southend, Essex and Thurrock Mental Health Strategy (ECC, 2024b) cited at paragraph 25.3.4.8 should inform the assessment, and the ES should describe how the Project supports rather than undermines its objectives.

1.4 Use of the WHO definition of health and a wider determinants approach

The Dahlgren-Whitehead model and the Marmot determinants are referenced in the guidance underpinning Chapter 25, but the scoping table is organised around environmental sources and impact pathways, not determinants of health. We recommend the ES Health and Wellbeing chapter is grounded in the WHO definition of health a state of complete physical, mental and social wellbeing, and not merely the absence of disease or infirmity and structured around the recognised wider determinants of health, with each technical pathway cross-referenced to the determinants it influences. ISEP guidance emphasises that scoping should be transparent about how each determinant of health has been considered. This approach also helps demonstrate compliance with the Public Sector Equality Duty under section 149 of the Equality Act 2010 and with paragraph 4.3.4 of NPS EN-1.

Comments on the baseline environment and study area

2.1 Drafting accuracy

Paragraph 25.5.2.2 of Chapter 25 states: “Life expectancy at birth for men in Buckinghamshire (77.4 years) is recorded to be lower than rates across Essex (80.1 years), the East of England (80.1 years) and England (79.3 years).” The figure of 77.4 years matches the Tendring entry in Table 25-2, and the comparison made is to Essex, East of England and England. The reference to Buckinghamshire is therefore an apparent drafting error and should read “Tendring.” We ask the Applicant to correct this and to undertake a wider quality assurance review of the baseline narrative to ensure consistency between the table and the supporting text.

2.2 Clarity on study area

We recommend the ES adopts a tiered study area, with the 500 m boundary used for direct local effects and a wider area defined for landscape/visual, traffic and cumulative pathways,

aligned with the relevant technical chapters' study areas. We also note that the chapter acknowledges at paragraph 25.2.1.3 that study areas may vary depending on the technical chapter being drawn on; we ask that the ES makes this explicit by presenting a single study areas table summarising the spatial coverage for each pathway.

2.3 Baseline data

Table 25-2 includes a substantial number of cells marked “–” at ward level, with data only available at Tendring District level. This is acknowledged at paragraph 25.2.1.7. While we recognise the limitations of OHID Fingertips data at small-area level, where ward-level data is unavailable the ES should:

- Use the Essex Joint Strategic Needs Assessment (JSNA) and the Tendring locality JSNA datasets, which provide the most current and locally validated public health intelligence for the Project area.
- Use Lower Super Output Area (LSOA) data from the Index of Multiple Deprivation 2019, the Income Deprivation Affecting Children Index (IDACI) and the Income Deprivation Affecting Older People Index (IDAOPI). These indices are referenced in the Acronyms list in the chapter but do not appear to be presented in the baseline.
- Reference Tendring's position within the Essex Levelling Up Areas. Three Essex local authorities (Tendring, Basildon, Colchester) are designated as Levelling Up areas under the Everyone's Essex plan (paragraph 25.3.4.9). Tendring contains some of the most deprived LSOAs in the country, particularly within Jaywick Sands, Harwich and Clacton, with significant health inequalities relative to the more affluent rural wards in the LSA. The ES should make this differential explicit.
- Specifically reference the wards within the LSA that contain pockets of higher deprivation. The chapter notes (paragraph 25.5.2.5) that Dovercourt All Saints and Dovercourt Bay residents have higher rates of disability-related limitation than the LSA average. Children in Year 6 with excess weight reach 36% in Dovercourt Bay (paragraph 25.5.2.8), well above the national average. These should be flagged as priority wards for the assessment.
- Include indicators that are currently absent from Table 25-2 but are highly relevant: dementia diagnosis rates (relevant given the projected 23% growth in over-65 population in Tendring), severe mental illness prevalence, GP-registered patients per practice, ambulance response times (relevant to the Council's earlier query about “blue light” access), and emergency hospital admissions for mental health conditions.

2.4 Future baseline

Paragraph 25.5.3.3 confirms Tendring's population is projected to grow by 9.4% over the period 2026–2036, materially higher than Essex (5.6%), regional (5.3%) and national (4.5%) growth. Paragraph 25.5.3.4 records a projected 23% growth in those aged 65 and above, again well above county, regional and national rates. This is a significant future-baseline finding because it indicates the population sensitive to construction and operational health pathways will be disproportionately old, with a higher prevalence of long-term conditions. The ES should reflect this in its sensitivity assessment for impacts on PRow, severance, air quality and noise.

Assessment methodology

3.1 Sensitivity assessment

Paragraph 25.6.2.1 (and the supporting paragraphs at 25.6.3) state that the assessment will take account of “the qualitative sensitivity of relevant populations and sub-populations and their ability to respond to change as applicable to each determinant.” The chapter does not, however, set out how this qualitative sensitivity will be determined. We ask the Applicant to confirm in the ES:

- Whether qualitative sensitivity will be informed by structured engagement with affected communities, including vulnerable groups identified through the WHIASU checklist.
- How the qualitative sensitivity narrative will be evidenced and presented in the ES, in line with the ISEP Determining Significance for Human Health in EIA guidance (Pyper et al., 2022b), which is clear that the population or sub-population’s sensitivity narrative should articulate the basis on which the judgement has been made.
- Without a clear and evidenced basis for sensitivity judgements, the assessment risks being challenged for lacking transparency and replicability. We recommend a structured combination of quantitative baseline data (including from the JSNA and OHID Fingertips), the WHIASU population groups assessment, and qualitative input from communities and health stakeholders.

Scoping decisions

We welcome that effects on access to and capacity of local community services (including healthcare and education) during construction are scoped in. We ask the assessment specifically addresses:

- Impact on A&E and ambulance service demand and response times, as flagged by ECC in Table 25-1 (“blue light services”). The ES should engage directly with the East of England Ambulance Service NHS Trust and East Suffolk and North Essex NHS Foundation Trust on this point.
- Construction worker health – including provision of accommodation that does not displace local rental supply and create housing pressure for vulnerable local residents; provision of on-site occupational health; and management of public health risks associated with shared accommodation.
- Mental health support arrangements for the construction workforce, the interaction between workforce wellbeing and community wellbeing where compounds are located adjacent to residential areas.

Related technical chapters

Consistent with our overarching observation in Section 2.1, we emphasise that the comments below should not result in the ES Health and Wellbeing chapter signposting to the technical chapters. Instead, the relevant pathway-level conclusions should be synthesised in the Health and Wellbeing chapter, with the technical chapters supporting that synthesis.

5.1 Cumulative effects with neighbouring schemes

The Health and Wellbeing chapter does not currently provide a substantive view on cumulative health effects, despite NPS EN-1 paragraph 4.4.5 requiring consideration of cumulative impacts where multiple developments may affect people simultaneously. Tendring, will experience overlapping NSIPs and growth schemes. Chapter 21 confirms (paragraph 21.7.5.2) that the Project corridor falls within the cumulative LVIA study area for the National Grid Norwich to Tilbury 400 kV connection, the East Anglia Connection Node (EACN) substation, and the Five Estuaries and North Falls onshore substations. The same cumulative footprint applies to noise, traffic and air quality effects. From a public health perspective, this is a significant cumulative pressure on a relatively small set of communities, and the cumulative health and wellbeing assessment should:

- Identify the residents most exposed to combined effects across multiple schemes, using the WHIASU vulnerable groups checklist as a screening tool.
- Quantify, where possible, the temporal sequencing of construction periods and consider whether the Tarchon construction period overlaps with construction of any other scheme, materially compounding the experience for affected communities.
- Consider the cumulative mental health implication of prolonged construction exposure across multiple schemes and apply the MWIA framework to this question, including specific consideration of “enhancing control” at the cumulative level (i.e. multi-promoter community liaison rather than scheme-by-scheme).
- Articulate the contribution of the Tarchon Project to a trend of incremental cumulative public health pressures (paragraph 25.7.3.6 of the chapter already references this principle).

Engagement, mitigation and monitoring

6.1 Community engagement and community anxiety

We welcome that paragraph 25.7.1.8 references engagement as primary mitigation. We expect the engagement strategy to:

- Identify proactively how community anxiety about construction disruption and cumulative scheme effects will be measured, monitored and responded to over the multi-year pre-application and construction periods.
- Use accessible language and varied formats (in person, online, in community languages where relevant) to ensure vulnerable groups identified through the WHIASU checklist can participate meaningfully. Tendring has communities with low literacy and digital exclusion that require tailored engagement.
- Provide a documented mechanism by which community concerns translate into changes in design, mitigation or management of the Project, in line with the MWIA “enhancing control” protective factor.
- Engage specifically with schools, care homes and faith groups close to the Project, including providing tailored information and the opportunity to feed in concerns.

6.2 Mitigation

We welcome the embedded mitigation set out at paragraphs 25.7.1.1 to 25.7.1.7, including the outline CEMP, CTMP and DEMP. Consistent with our overarching observation at Section 1.1, we ask that the ES Health and Wellbeing chapter brings together mitigation commitments made in other technical chapters into a consolidated mitigation register, organised by health pathway. This will allow:

- The Examining Authority and consultees to scrutinise the cumulative health-protective effect of embedded mitigation in one place.
- Affected communities to understand, in plain language, what is being done to protect their health from each of the identified pathways.
- Mitigation gaps to be identified, for example, where embedded mitigation in other chapters does not address a specific health pathway and additional mitigation is required.
- Beyond the technical mitigation already described in the Scoping Report:
- The CEMP should set out a Community Liaison protocol, including named local liaison officers, public-facing complaints procedure, response time commitments, and escalation route to the Applicant's board.

ECC Public Health, Wellbeing and Communities Team welcomes the opportunity to comment on the Tarchon Interconnector Project EIA Scoping Report. Our comments are intended to ensure that the population health pathways arising from the Project are identified, scoped and assessed in line with current ISEP / IEMA guidance, and that the assessment makes full use of the WHIASU vulnerable groups framework and the MWIA framework. We particularly draw attention to the need for a coherent and integrated discussion of health within the ES Health and Wellbeing chapter, the elevated baseline health needs of Tendring District, the cumulative pressure of multiple energy infrastructure schemes in close proximity, and the importance of structured engagement with the local population in shaping the Project.

The ES should consider how GI measures can contribute to mitigating potential health and wellbeing impacts arising from the project, particularly those associated with construction activity, temporary disruption to Public Rights of Way, and changes to access to recreational environments. This should include consideration of how existing green spaces, routes and GI assets support physical and mental wellbeing, and how these functions are maintained or reinstated during and following construction.

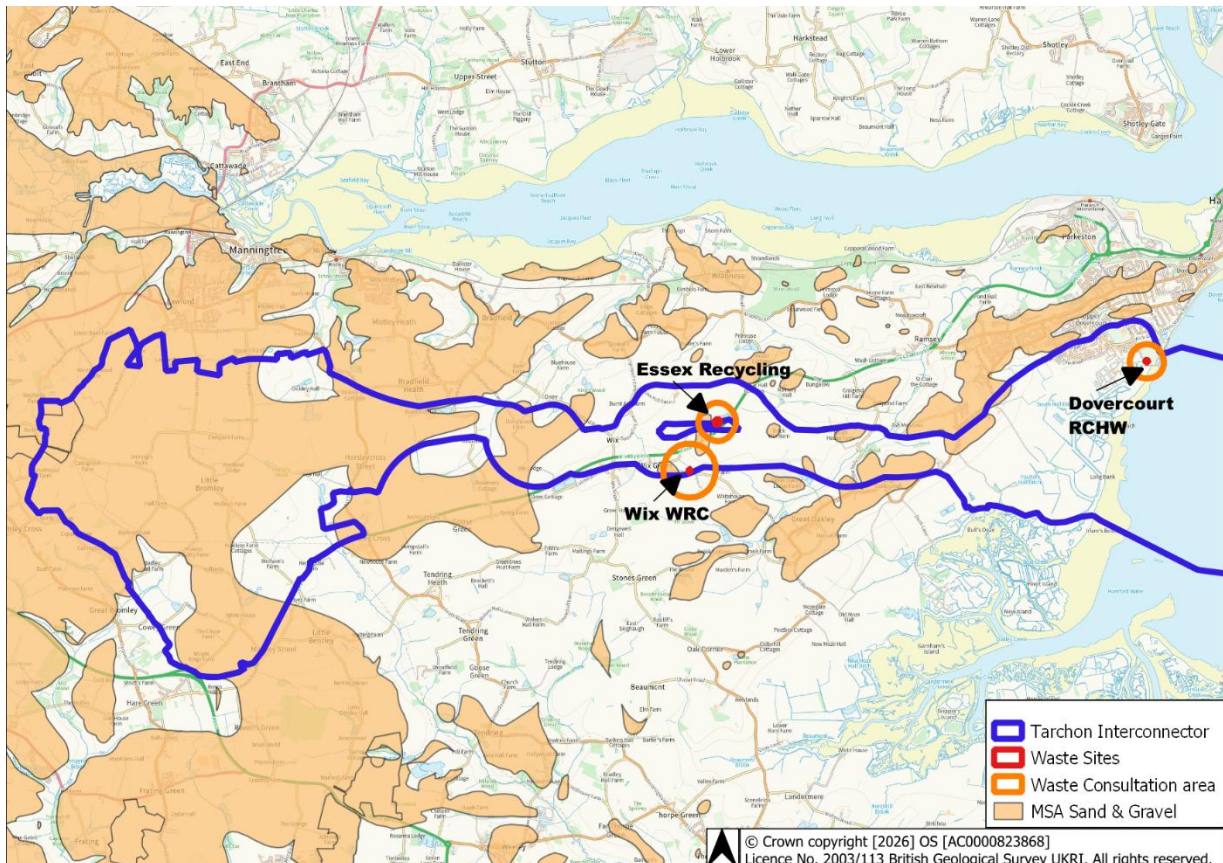
This approach is supported by the National Planning Policy Framework (2024), including paragraph 8(c), which promotes environmental protection and enhancement as a core planning objective, and paragraph 96(c), which highlights the importance of access to high-quality open spaces for health, wellbeing and climate resilience.

ECC recommends that relevant best-practice guidance is used to inform this assessment, including the Green Infrastructure Framework Accessible Greenspace Standard (which promotes access to green and blue spaces within a 15-minute walk) and [principle 6](#) of the Essex Green Infrastructure Standards, which addresses the health and wellbeing benefits of GI. The applicant should consider whether GI, access and reinstatement measures support a range of users, including different ages and abilities.

26. Materials and Waste

Paragraph 26.5.5.1 correctly asserts that there are no safeguarded mineral sites within the Scoping Boundary.

Paragraph 26.5.4.1 notes that waste management infrastructure is not considered further in the baseline due to IEMA Guidance. The Minerals and Waste Planning Authority (MWPA) accepts this conclusion but notes that the Outer Limits of the project currently involves 3 Waste Sites and intersect their Waste Consultation Areas as shown in the map below:



Facility	Planning Application Reference	Planning Description
Essex Recycling	ESS/35/03/TEN	Change of use to inert waste recycling centre:- (I) Use of part of yard for storage of inert waste & crushed concrete. (ii) 2.4 metre high concrete A block retaining wall. (iii) mobile crusher on no more than 18 days per yr. (iv) Garage 4 lorries (v) Office
Dovercourt Recycling Centre Household Waste RCHW	Historic – Latest application on digital record: CC/TEN/110/05	Installation of three 5-metre high columns in order to fit CCTV cameras and associated floodlighting for surveillance

Wix Water Recycling Centre	No application reference on digital record	

With the Outer Limits currently intersecting with these Waste Consultation Areas, an application would be subject to Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). The WLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/waste-local-plan>

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy 2 defines Waste Consultation Areas as extending up to 250m from the boundary of existing or allocated waste infrastructure, unless they are Water Recycling Centres, where the distance increases to 400m.

Due to the proposed project passing through a Waste Consultation Area, a Waste Infrastructure Impact Assessment (WIIA) would be required as part of a planning application. In order to satisfy the provisions of Policy 2, the MWPA has designed a generic schedule of information requirements that should be addressed as relevant within the supporting evidence of any application which falls within a Waste Consultation Area. The detail to be provided should be in proportion to the nature of the proposed application.

Waste Infrastructure Impact Assessment Components

Waste Infrastructure Assessment Components	Information requirements & sources
Site location, boundaries and area	• Application site area in relation to safeguarded site(s) • Description of proposed development • Timescale for proposed development
Description of infrastructure potentially affected	• Nature of relevant safeguarded facility • Type of material handled/processed/supplied • Throughput/capacity
Potential sensitivity of proposed development as a result of the operation of existing or allocated safeguarded infrastructure	• Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes. • The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility • Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission. • Impacts on the proposed development in relation to: ○ Noise ○ Dust ○ Odour ○ Traffic

	○ Visual ○ Light
Potential impact of proposed development on safeguarded infrastructure/ allocation	• Loss of capacity – none, partial or total • Potential constraint on operation of facility – none, partial or full
Measures to mitigate potential impacts of operation of infrastructure on proposed development	• External and internal design & orientation eg landscaping; living & sleeping areas facing away from facility. • Fabric and features eg acoustic screening & insulation; non-opening windows; active ventilation
Conclusions	• Sensitivity of proposed development to effects of operation of safeguarded infrastructure/facility can be mitigated satisfactorily; or • If loss of site or capacity, or constraint on operation, evidence it is not required or can be re-located or provided elsewhere

A WIIA is expected to be evidence based and informed by quantified information. It is recognised that the requirements of a WIIA may be addressed through other evidence base documents, such as those addressing transport, odour and noise issues. In these instances, it would be acceptable for the WIIA to signpost to the relevant section of complementary evidence supporting the planning application. The MWPA welcomes early engagement to clarify the requirements of WIIA.

Paragraph 26.5.6.3 states that ‘For the purposes of assessment, landfill void capacity is assumed to remain the same as the current baseline. It is assumed the WPA would consent new landfill void capacity to replace that which has been used up should the need arise’. This is not considered to be an appropriate assumption. The ability to consent to new landfill void capacity relies on planning applications for landfill void capacity being submitted that are considered suitable in land use planning terms and which are able to obtain a licence from the Environment Agency. This process is not the sole gift of the WPA and therefore the provision of additional capacity should not be assumed. Future waste evidence supporting a planning application should demonstrate the minimisation of waste creation and identify those facilities with finite capacity which are likely to be relied upon for waste management, using the latest capacity figures available at the time of assessment and use a trend-based approach to estimate changes over time from the point of assessment to construction of the Project.

The MWPA accepts the rationale for removing waste arisings from consideration within the EIA and welcomes the intention to produce a Site Waste Management Plan (SWMP) as part of a CEMP. Paragraph 8 of the NPPF recognises the importance of “using natural resources prudently and minimising waste”

Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated as a result of development/ redevelopment. Not only does this reduce the need for mineral extraction, it also reduces the amount sent to landfill. Clause 4 specifically requires:

“The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site.”

A SWMP would be expected to:

- present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation,
- establish strategic forecasts in relation to expected waste arisings for construction,
- include waste reduction/recycling/diversion targets, and monitor against these,
- advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the identification of available capacity across an appropriate study area.
- A SWMP could be combined with a ‘Materials Supply Audit’ to enable the monitoring of material entering the site as construction material and that leaving the site as waste to enable a net balance to be calculated to demonstrate adherence to Circular Economy Principles.

27. Tourism and Recreation

ECC notes the lack of available recent tourist accommodation data. The Accommodation Stock Audit published by Visit Britain used to provide the number of tourist rooms in Tendring is dated 2016. The occupancy rates are produced monthly by Visit Britain with the 2026 figures cited for these purposes.

Para 27.5.1.19 - appears to contradict the information provided at para 12.2.1.8, please confirm that the NCN passes through the current EOS scoping boundary along Low Road and Wick Lane within Dovercourt.

Para 27.5.2.7 - ECC requests clarity on the what the ‘known future planned uses’ are referenced in this paragraph – other than the King Charles III coastal path.

Para 27.6.1.6 - The statistical sources and desk-based research will not be sufficient to pick up potential impacts on the recreational use of the beach huts, associated amenity land and wider tourist economy along the Promenade at Dovercourt. Whilst these areas are used all year round, peak periods are seasonal and need to be considered as both the sensitivity and magnitude of the impacts have the potential to alter in their severity.

Para 27.7.3.6 - ECC supports the inclusion of wider assessments of impacts on PROW as part of a wider recreational value. The Essex Way has the potential to be greatly disrupted by the proposals without careful consideration of accessibility and recreational amenity throughout the phases of the project.

The Scoping submission correctly makes reference to the importance of this within the Tendring region, its key impact on providing jobs, as well as providing a leisure destination for thousands of tourists and day trippers. The coastline is dotted with holiday uses and includes the main town of Clacton as a traditional seaside destination, as well as other leisure-based uses. Tourism does, as it is correctly identified, represent a key component of the Tendring area, and there are ample tourism related activities on the Tendring coast and in the hinterland for both indoor and outdoor activities. It also has a significant influence in the visitor economy. Economically tourism accounts for about 15% of economic value and jobs. However, its effects are far wider as it supports visitor attractions, heritage assets, recreational activities, key organised events, and retail, spent in the town centres and villages including restaurants and cafes that rely on the increased and high value trade to survive. Accordingly, any damage to the area's attractiveness for visitors would impact negatively on the food and drink sectors, and the brand and reputation of the District and would be considered an unacceptable risk. Further work is required to identify and assess how any impact on the tourism economy will be managed and mitigated

It is acknowledged the actual construction work will have a detrimental impact on tourism, due to the noise and views of the construction site. However, the construction programme will have addition socio economic impacts on tourism. A migrant construction workforce will need to be housed and this could reduce the availability of tourist accommodation available in the local area, and who's chief income is focused on the tourism industry. The size of the construction workforce is not yet known, however, with the number of other NISPS in the area such as Norwich to Tilbury, Five Estuaries and North Falls, together with other significant proposals in relatively close proximity for example Sizewell C, the effect on the availability of tourist accommodation will be accumulative.

The area's visitor offer also relies on the availability of its visitor accommodation offer (eg bed and breakfast, camping, caravan and static sites etc) which is in high demand especially during the peak summer months. Any short-term disruptions to this accommodation supply would have lasting effects on repeat visitor numbers. It is vital that this increased demand on certain types of accommodation during the peak construction period does not negatively impact on the visitor numbers and will need to be managed during the construction and operational phases. The Council seek the provision of legacy benefits through the provision of new and improved existing accommodation alongside create new, sustainable, quality visitor accommodation.

It is requested that tourism and its impacts are scoped into the future submission on this NSIP proposal.

28. Air Quality

Baseline and Sensitive Receptors

ECC agrees that the identification of sensitive human receptors, including residential properties, schools and other community facilities within the Study Area, is appropriate. The ES should clearly describe baseline conditions using the most recent air quality monitoring data available and should confirm whether any receptors are located within, or close to, declared Air Quality Management Areas (AQMAs), or areas where pollutant concentrations

are approaching relevant objectives. Where reliance is placed on background maps or modelled data, this should be clearly explained and limitations acknowledged.

Construction Phase Impacts

The Council agrees with the scoping-in of construction phase air quality effects, in particular:

- fugitive dust emissions from earthworks, construction traffic and stockpiling;
- exhaust emissions from non-road mobile machinery (NRMM); and
- emissions associated with construction traffic on the local highway network.

The ES should clearly set out the methodology for assessing dust risk magnitude and sensitivity, in accordance with recognised guidance, and should demonstrate how risks at nearby receptors will be minimised.

Environmental Health expects that:

- construction dust impacts are primarily mitigated through embedded measures, and
- these measures are consolidated within a secured CEMP incorporating a clear Dust Management Plan.

The ES should confirm that mitigation will be enforceable and proportionate to the risk identified, rather than relying on generic good-practice statements alone.

NRMM and Construction Emissions

The ES should clarify the assumptions relating to NRMM emission standards, including:

- plant specification (e.g. Stage V compliance where reasonably practicable),
- controls on idling,
- maintenance regimes, and
- siting of generators or combustion-based equipment.

Where construction works are long-term or phased, the ES should explain how emission controls will be managed over time to limit impacts at sensitive receptors.

Traffic-Related Air Quality Impacts

The scoping-in of traffic-related air quality effects during construction is appropriate.

Environmental Health advises that the ES should:

- clearly identify affected road links,
- explain the screening and significance criteria applied, and
- assess impacts cumulatively where traffic effects overlap with other committed or reasonably foreseeable major projects.

Any reliance on traffic thresholds or screening criteria should be fully justified.

Operational Phase

ECC notes that operational phase air quality effects are proposed to be scoped out. This is acceptable in principle, provided that the ES clearly demonstrates that:

- operational traffic associated with the development will be negligible; and

- emissions from fixed plant, back-up generators or cooling systems (if any) will not give rise to adverse effects at sensitive receptors.

Where combustion plant or generator testing is proposed, the ES should confirm that this will be controlled through design, siting and operational management.

Cumulative Effects and Residual Risk

ECC supports the inclusion of cumulative air quality effects, particularly during construction, where multiple projects may be active within the same locality or transport corridors. The ES should clearly explain how cumulative construction emissions and traffic effects have been considered and how uncertainty has been addressed.

29. Carbon and Climate Change

ECC requests further details on the embodied carbon and operational carbon of the interconnector building. In line with best practise, for example, the UK Net Zero Carbon Building Standard and the policy positions Greater Essex 1 and Greater Essex 2 found on the Essex Design Guide website.

This chapter focuses primarily on greenhouse gas emissions and policy compliance; however, in accordance with NPPF paragraph 164(a) and the requirements of NPS EN-1 and EN-5, ECC considers that GI plays a material role in meeting climate change mitigation and adaptation objectives and should be properly considered within the scope of the EIA. ECC therefore requests that Chapter 29 explains how GI contributes to the project's overall approach to climate resilience and future-proofing, with appropriate cross-referencing to relevant topic chapters.

This should include the use of SuDS to manage increased rainfall intensity and surface water flood risk; a detailed GI and landscaping strategy, secured as part of the LEMP, to improve urban cooling, drought resilience, biodiversity and long-term ecosystem function; and design principles that support Low-Carbon and active travel, where practicable.

While detailed assessment of these measures may sit within the Water Environment, Biodiversity, Landscape and Transport chapters, ECC considers that EN-1 places clear emphasis on embedded mitigation and climate change adaptation, which should be addressed strategically within Chapter 29 and secured through appropriate outline strategies and requirements at application stage.

30. Risk of Major Accidents and Disasters

The ES should clearly cross-reference Chapter 8's flood risk findings into Chapter 30, so it is unambiguous how surface water flooding is treated as a potential major disaster scenario and what controls/mitigation measures will be secured.

In view of the clustering of NSIPs in the Tendring area, local residents have raised concerns about the clustering of major energy infrastructure in the area and the implications for resilience, including the potential for cascading consequences arising from incidents affecting multiple assets. The Councils consider that the most appropriate bodies to comment in detail on security-related risk (including malicious acts) and emergency response capability are the

relevant blue light services. The applicant is therefore encouraged to demonstrate that these bodies have been appropriately consulted and that appropriate emergency arrangements are in place.

In addition, the ES should clearly address the potential for escalation and cascading consequences associated with fire and major incident scenarios at the converter station and associated electrical infrastructure, including how risks are prevented, controlled and contained. This should include a clear statement of design and operational measures, and a secured mechanism for post-consent approval of emergency response procedures (including fire response and incident management), informed by consultation with the relevant emergency services.

32. Approach to Cumulative and Transboundary Effects

The Councils welcome the inclusion of Chapter 32 and broadly support the proposed tiered Cumulative Effects Assessment (CEA) and transboundary screening approach, including the intention to apply a source-pathway-receptor framework, topic-specific spatial/temporal boundaries, and to assess cumulative effects with relevant projects in the region.

The ES should include a clear screening schedule of “other developments” considered to ensure it captures the full cluster effect, recording the basis for inclusion/exclusion (spatial/temporal overlap, pathway/receptor linkage, project status and data confidence) and commit to updating this at PEIR/ES to reflect changes in design, programme and baseline.

The ES should justify topic-specific cumulative study areas and temporal assumptions (construction/operation/decommissioning), demonstrating that the selected boundaries capture realistic impact pathways (including indirect pathways) and the potential for overlapping construction programmes in the locality. In particular, the ES should explain how interrelated effects will be presented so that decision-makers can understand the overall burden on communities and sensitive environments, not only topic by topic outcomes.

Given the concentration of NSIPs and shared receptors around the EACN locality, the ES should clearly explain how it will assess cumulative effects arising from clustered infrastructure (including combined construction disturbance and combined operational effects) and how embedded mitigation relied upon in the assessment will be secured.

34. Summary and Conclusions

Table 34-1: Elements to be scoped in and out (onshore topics)

Within Traffic & Transport, ECC would like to see Operational impacts to national / regional walking & cycling routes and impacts to PROW from operation and maintenance vehicles scoped in.

Within Land Use, Soils and Agriculture, while ECC accepts EMFs do not require full scoping the ES should not be silent on this matter, Tarchon should add an FAQ to their website and consider reviewing the performance of soil above the cable corridor as part of the 5yr ALC reclassification.

Table 34-3: Elements to be scoped in and out (UK Scheme wide) - Landscape and Visual Impact Assessment Chapter - we are unclear about the scoping approach, as designated landscapes appear to be both scoped in and scoped out.

“Impacts on landscape elements, landscape character and special qualities of designated landscapes. Impacts on views/visual amenity” are scoped out for the Operational and Decommissioning phases. We consider that these should remain scoped in.

Within Noise and Vibration, ECC would like the construction impacts on beach users to be explicitly scoped in.

Within Socio Economics and Land use, the temporary impacts to GVA should include potential for local businesses to access the supply chain.

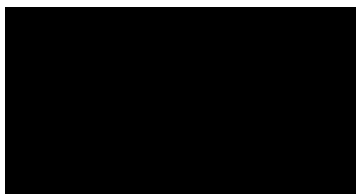
Within Risk of Major Accidents and Disasters, inclusion of potential for the UK Scheme to exacerbate existing hazard should be scoped in for Construction and Operational given the proximity of 3 other NSIP substations projects within the locality. The potential for a major incident occurring with this conglomeration of major infrastructure needs fully scoping for the safety of local communities.

EIA Scoping Report - Part 2 - Volume 6 Annexes

Annex A22-1 Indicative Receptor Identification

We note that ‘Figure A22-3 - Sites of Special Scientific Interest’ is not showing Hamford Water SSSI.

Yours sincerely,



Technical and Operational Lead, Nationally Strategic Infrastructure Projects
Essex County Council

T: [Redacted]
E: [Redacted]@essex.gov.uk
W: www.essex.gov.uk



Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

tarchoninterconnector@planninginspectorate.gov.uk

06 May 2026
VE Ref: 006787154-01

Dear Sir / Madam,

**Five Estuaries Offshore Wind Farm – Response to Tarchon Interconnector Project
Environmental Impact Assessment Scoping Report (GBTARC-ENV-APE-AP-00042) -
EN0210009**

Five Estuaries Offshore Windfarm Limited (“Five Estuaries”) acknowledges receipt of the Planning Inspectorate’s letter dated 08 April 2026 inviting comments on the Environmental Impact Assessment (EIA) Scoping Report for the Tarchon Interconnector Project.

Five Estuaries is promoting the Five Estuaries Offshore Wind Farm project in the southern North Sea. Development consent for Five Estuaries Offshore Wind Farm was granted by the Secretary of State on 17 December 2025 and the Five Estuaries Offshore Wind Farm Order 2025 came into force on 08 January 2026. Five Estuaries will connect up to 1080 MW of clean, renewable energy into the national grid at the proposed East Anglia Connection Node Substation, which forms part of the Norwich to Tilbury Project.

In that context, Five Estuaries’ interest in the Tarchon Interconnector is focused on ensuring that potential interactions and cumulative effects between the Tarchon Interconnector and other infrastructure projects (including Five Estuaries) are appropriately assessed and mitigated.

Five Estuaries provides the following comments to assist the Planning Inspectorate in confirming an appropriate scope for the Environmental Impact Assessment (EIA), consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations and relevant Planning Inspectorate guidance.

The Scoping Report includes a large Scoping Area onshore and multiple routes offshore. This means it is difficult to clearly identify the spatial and/or temporal interactions between the Tarchon Interconnector and Five Estuaries. Five Estuaries will be seeking to work with Tarchon to ensure that any proposed overlapping route is technically feasible when considering the known constraints to cable laying in this area.

On the basis of the information currently available in the Tarchon EIA Scoping Report, Five Estuaries request that the Environmental Statement (ES) should, as a minimum consider the following:

1. Project interaction and cumulative assessment

- > Include Five Estuaries in the cumulative impact assessment for all relevant receptors (e.g. offshore / onshore ecology, commercial fisheries, navigation and shipping, marine archaeology, seascape, traffic and transport, and socio-economics), with a clear rationale for project inclusion or exclusion in each topic.

2. Use of up-to-date data and consultation

- > Use the most up-to-date publicly available data on the Five Estuaries project (including final Order Limits, cable corridors and construction programmes) when defining the cumulative and future baseline.
- > Engage directly with Five Estuaries during the EIA process to confirm data inputs, construction/operation design assumptions and to identify opportunities to minimise conflict and promote coordination where practicable.

3. Traffic and Transport

- > Five Estuaries notes that the Applicant identifies that there are likely to be cumulative traffic and transport impacts associated with the projects, should the construction programmes overlap, within the Traffic and Transport study area.
- > Five Estuaries would like to note that the A120/Bentley Road junction is not referred to in the list of junctions in the Traffic and Transport study area in the Scoping Report. Five Estuaries consider that this junction should be included within the assessment even if traffic using the route would be relatively minor given the sensitivity of the junction and the proposed use by a number of infrastructure projects. It is noted that Bentley Road is referred to in terms of the local road junctions in Little Bromley.

4. Offshore infrastructure and seabed interaction

- > Ensure that the ES describes any potential for interaction between Tarchon export cables and offshore platforms with existing and proposed offshore wind export cables, array cables and other seabed infrastructure (e.g. telecoms cables, pipelines), and assesses the associated risk (e.g. cable crossings, proximity effects) and proposed mitigation.

- > Consideration of seabed scour should be included for any proposed cable crossings to ensure that the crossed asset is appropriately protected.
- > Consideration of potential for dredging to be required and the placement of dredged material should be considered.
- > The impact of electromagnetic interference with planned / existing power cables should be considered.

5. Navigation and safety

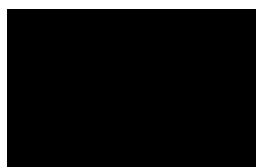
- > Five Estuaries would expect the assessment to be aligned with recently examined projects in the area if the southern offshore cable route is selected for assessment in the ES, with consideration given to the ability to meet requirements on reduction in navigable depth when installing cable crossings.
- > It is unclear whether “Displacement or access impacts associated with construction activities and use of advisory zones.” is scoped in or out of the Tarchon ES. However, given the commitments made by recently examined projects in terms of concurrent working in the region it is recommended to be scoped in.

6. Mitigation and design coordination

- > Where relevant, identify mitigation and/or design measures that could reduce or avoid adverse cumulative effects with offshore wind projects (for example, alignment of corridors, coordinated planning of cable crossings, or agreed protocols for construction interaction and information sharing).

Five Estuaries reserves the right to comment further at future stages of consultation as more detailed information on the Tarchon Interconnector and its programme becomes available. Five Estuaries acknowledges the initial engagement by Tarchon and welcomes its proposed approach to coordination and coexistence set out in 4.2.3.4 and 4.2.3.5, and looks forward to more extensive engagement on relevant topics. Five Estuaries would be happy to attend relevant Expert Topic Group meetings, particularly in relation to navigation and traffic and transport, mentioned in 4.4.3, if appropriate.

Yours faithfully,



Project Lead
Five Estuaries Offshore Wind Farm

From: [REDACTED]@forestrycommission.gov.uk>

Sent: 01 May 2026 17:29

To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>

Subject: Tarchon Interconnector Project - EIA Scoping Consultation

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.

We note there are 4 small areas of Ancient Woodland within the scoping boundary, including Alder Carr, Chequers Wood, Manning Grove and a small unnamed Ancient woodland.

There are also several small areas of mixed deciduous priority habitat woodland within the scoping boundary.

We note that it is planned that all ancient woodland will be retained and avoided where possible.

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.

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”

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.

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

We would expect to see a detailed assessment of any impacts to the ancient woodlands, 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.

Mixed deciduous woodland – Priority Habitat:

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. Loss of habitat connectivity is a particular concern.

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.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

A scheme that bisects any woodland, will not only result in a significant loss of woodland cover, but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation which will have a negative impact on it's ability to respond to the impacts of climate change.

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.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site. 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 near ancient woodlands.

Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland.

Avoiding impacts and good landscape design

To meet planning policy and Government guidance, we advise that the EIA scoping and future environmental assessments for this project should include the following:

- Robust adherence to the Standing Advice to rule out loss and deterioration of ancient woodland, ancient trees and veteran trees as far as possible. For example, this may include the need for a larger buffer area than the 15m buffer which is a minimum required for a single dwelling and *might* be sufficient for ruling out impacts to roots in many cases but a larger buffer *may* be required to

avoid other impacts (eg hydrological changes). The Assessment Guide in the Standing Advice can help the applicant to establish what further assessments may be needed as part of the EIA process to avoid unexpected problems later on in the design process.

- A thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), to assess any net loss of trees 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 be considered in terms of their overall connectivity between woodlands affected by the development.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area.
- Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050.

We hope these comments have been useful to you. If you require any further information, particularly on buffer zones for ancient woodland or veteran trees, or tree planting and habitat connectivity, please don't hesitate to contact me.

Best wishes

[Redacted]

[Redacted]

**Local Partnership Advisor
East & East Midlands**

Tel: [Redacted]

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



[Subscribe](#) to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware.

From: Town Clerk <Clerk@fwtc.co.uk>

Sent: 05 May 2026 15:05

To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>

Subject: EN0210009 response

You don't often get email from clerk@fwtc.co.uk. [Learn why this is important](#)

Good afternoon

Please see below the response to the request from the Planning Inspectorate application **EN0210009** by Tarchon Energy Limited's Environmental Statement (ES) scoping process as discussed at the council meeting on 30th April 2026.

The Town Council welcomes this consultation by the Planning Inspectorate and would wish to be kept informed throughout the process.

We have read with interest the information contained within the document attached to this consultation as to the detail to be included in the Environmental Statement scoping process. We share the concerns of residents that the instantiation of cabling may have an impact on the ecology of the backwaters. This in turn may have a lasting impact on traditional employment such as fishing and ecotourism. However, we have no qualified expertise within house to add detail to the environmental issues to be addressed within the scoping document.

If any relevant information becomes available to us in the future we forward to be published on the website as a late response.

Kind regards

[Redacted Signature]

Frinton & Walton Town Council

Tel: [Redacted]

I can be contacted during the opening hours of Tuesday-Friday 9am-1pm.

[Frinton & Walton Town Council Website](#)

[Columbine Centre Facebook](#)



**Civility &
Respect**

IN COLLABORATION WITH SLCC, NALC, OVW, COUNTY ASSOCIATIONS

*For details of our [Privacy Policy](#) and your rights under GDPR, please visit our website:
[General Data Protection Regulation - Frinton and Walton Town Council \(fwtc.co.uk\)](#)*



For the attention of [REDACTED]
Environmental Services
Infrastructure Decisions and Application Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough, SL1 4PN

Name : [REDACTED]
Department : Offshore Operations
Mobile : [REDACTED]
E-mail : [REDACTED]@rwe.com
Reference : GWFL-LET-Tarchon-01

Date : 5 May 2026

Dear Sirs,

**Subject : Planning Act 2008 (as amended) and The Infrastructure
Planning (Environmental Impact Assessment) Regulations 2017
(The EIA Regulations – Regulations 10 and 11**

**Application by Tarchon Energy Limited (the applicant) for an
Order granting Development Consent for the Tarchon
Interconnector Project (the proposed development)**

1. Introduction

Gallopier Wind Farm Limited (GWFL) provides the following comments to assist the Planning Inspectorate in confirming an appropriate scope for the Environmental Impact Assessment (EIA), consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations and relevant Planning Inspectorate guidance.

GWFL recognises that the purpose of scoping is to identify matters that should be assessed in detail within the EIA and to confirm that the assessment remains proportionate. The comments below are provided in the context of offshore matters within the scope of the Tarchon Interconnector EIA, as defined in the EIA Scoping Report.

2. Existing Environment and Baseline Conditions

The proposed study area overlaps with the Gallopier Offshore Wind Farm operational environment, including:

- Established marine access routes used by Crew Transfer Vessels (CTVs) from the Gallopier Operations and Maintenance (O&M) Facility at Harwich;
- Operational wind turbine generator (WTG) structures located along the periphery of the Gallopier Wind Farm, in close proximity to certain interconnector route options;
- Potential interaction with the Gallopier inter-array cables between the north and south of the wind farm array, depending on route selection; and
- Potential interaction with the Gallopier export cable, depending on route selection.

[Gallopier Wind Farm Ltd](#)
Windmill Hill Business Park
Whitehill Way
Swindon
SN5 6PB
T +44 (0)1793 877777

Registered office:
Gallopier Wind Farm Limited
Windmill Hill Business Park
Whitehill Way
Swindon
SN5 6PB
Company No. 7320597

These baseline conditions are acknowledged within the Scoping Report, which recognises existing offshore infrastructure and routine vessel activity as part of the prevailing offshore environment.

3. Marine Operations and Navigational Safety

The GWFL O&M Facility at Harwich supports daily marine operations that are fundamental to the continued safe and efficient operation of Galloper Wind Farm.

GWFL notes that collision with a third-party vessel, vessel displacement leading to risk of allision with wind farm structures and a Navigational Risk Assessment (NRA) are included within the scope of the Shipping and Navigation assessment.

The assessment should give full consideration to Galloper O&M activities as detailed within the Galloper Development Consent Order (DCO) and Marine Licences listed below:

- Galloper DCO: DCO/2013/00003;
- Galloper O&M Generation Marine Licence: L/2022/00072/2; and
- Galloper O&M Facility Marine Licence: L/20218/00345/2,

together with the associated licence applications, as these documents define the consented operational framework within which routine vessel movements and offshore activities take place.

4. Anchoring, Cable Crossings, Seabed Preparation, SIMOPS and Stakeholder Coordination

GWFL has concerns regarding anchoring activities and the associated risk to the integrity of existing inter-array and export cables, particularly in the context of cable crossing construction activities. To minimise the risk of anchor strike and related damage to operational assets, GWFL would expect a risk-led approach to vessel selection, including the use of Dynamic Positioning (DP) vessels for relevant construction and installation activities where practicable.

Should the Tarchon Interconnector project proceed, Cable Crossing Agreements would be required and should be developed with GWFL and the Offshore Transmission Owner (OFTO) in advance of any works affecting existing infrastructure. These agreements should take account of operational and maintenance activities for the lifetime of both projects.

In the event that cable crossing works result in the temporary or permanent de-energisation of Galloper inter-array or export cables, GWFL and its OFTO would expect appropriate arrangements to be agreed in respect of any resulting impacts.

Where any seabed preparation is proposed in the vicinity of Galloper Wind Farm — including, for example, unexploded ordnance (UXO) clearance, seabed clearance or sandwave levelling — early, proactive and project-specific engagement with GWFL should be undertaken. Such engagement should ensure that the potential implications for Galloper's operational assets, subsea cables and marine access arrangements are fully understood and appropriately managed in advance of any works.

Any simultaneous operations (SIMOPS), particularly those relating to vessel interaction within or adjacent to the Galloper Wind Farm and export cable corridors, should be managed through effective stakeholder engagement and robust marine coordination processes. During construction, GWFL requires advance and ongoing engagement to ensure appropriate coordination with its O&M activities and to support the continued safe and efficient use of the marine area.

5. Cumulative and In-Combination Effects

GWFL notes that Galloper Wind Farm has been included as an operational receptor within the scope of the cumulative effects assessment, in combination with other offshore wind farms and interconnector projects, including overlapping construction and O&M vessel activity and shared

marine routes.

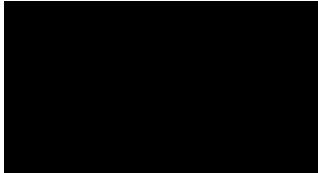
6. Mitigation, Design Evolution and Consultation

GWFL would welcome early and ongoing engagement with the Tarchon project throughout the EIA process to enable the timely sharing of relevant Galloper operational information and to inform the identification, refinement and implementation of appropriate mitigation measures. Early engagement will support effective design evolution and reduce the potential for adverse interactions with existing operational infrastructure and marine activities.

7. Closing Remarks

GWFL trusts that the comments set out above will assist the Planning Inspectorate in confirming an appropriate and proportionate scope for the Environmental Impact Assessment. GWFL would welcome engagement with the Applicant to ensure that interactions with existing operational offshore infrastructure are fully understood and appropriately managed as the project develops.

Yours sincerely,



General Manager
Galloper Wind Farm Limited

By email only:

tarchoninterconnector@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 1/05/2026

Dear Sir/Madam,

**PROPOSED TARCHON INTERCONNECTOR PROJECT
PROPOSAL BY TARCHON ENERGY LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your e-mail of dated 8/04/2026 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

From the information provided, it can be determined that none of the onshore areas identified by the Applicant (i.e. Indicative Landfall Zone, Refined Area of Search for Converter Station and HVAC Cable Route, and Indicative Onshore HVDC Cable Route Corridor Including Buffer) would fall within the consultation zones for any onshore major hazards sites or pipelines. We would therefore not advise against the proposed development.

Would Hazardous Substances Consent be needed?

The information provided indicates that operations at the Applicant's site would not be of a kind that would require Hazardous Substances Consent, however the Applicant should be advised to seek information from the relevant Hazardous Substances Authority should this not be the case.

Explosives Sites:

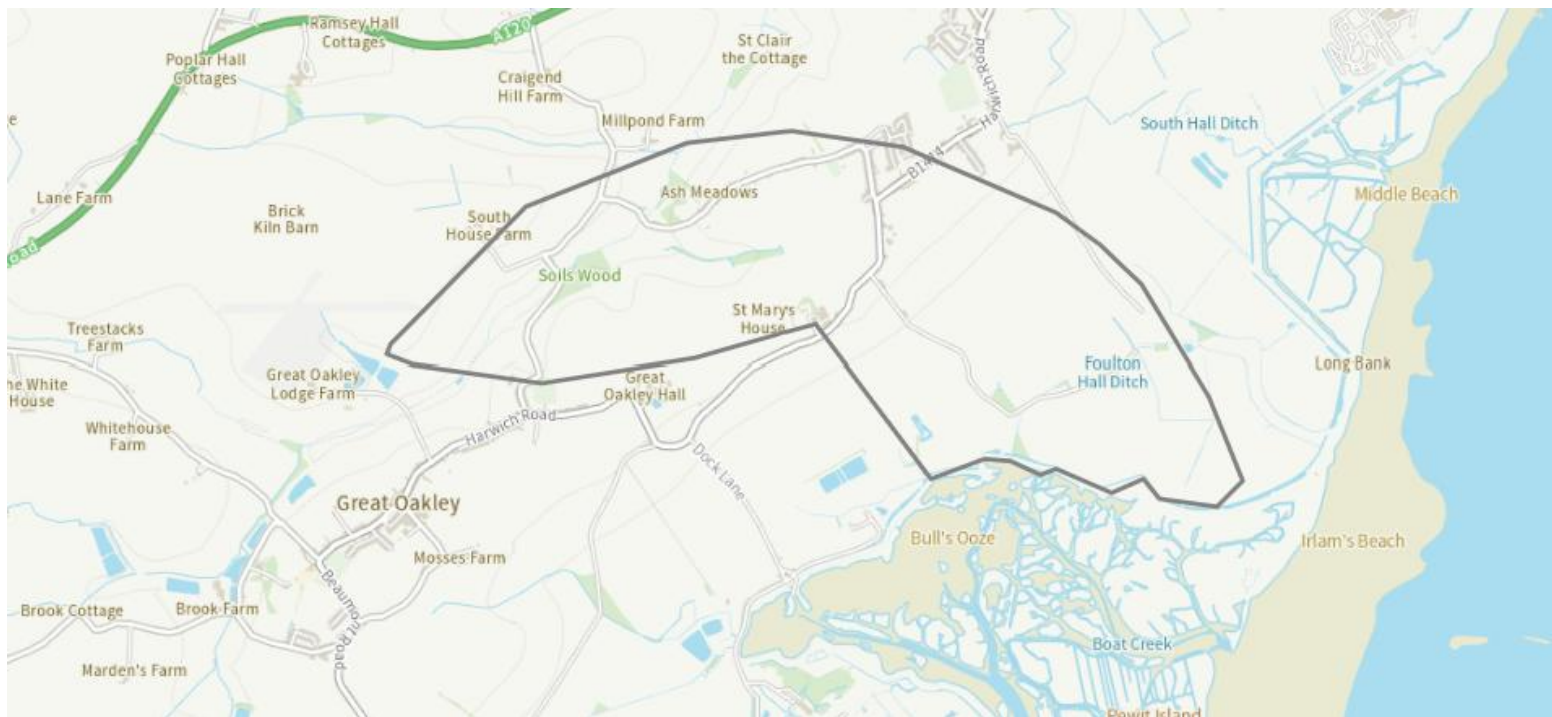
The proposed development does fall within the safeguarding zones of the nearby HSE explosives licensed site in the Great Oakley area.

The proposed development relates to the importation of electricity to the UK from Germany. The associated Converter station will house specialist equipment to convert HVDC to HVAC (and vice versa), comprising a series of buildings with a total footprint of up to 7.50 hectares, building heights up to 26 metres, and lightning masts reaching up to 30 metres.

Based on the submitted documentation, the Converter Station is proposed to be located within 5km of the grid connection point, to the north of Little Bromley Road and west of Grange Road. This location appears to be approximately 11km from the Class E separation distance of the nearby HSE explosive licensed site. On this basis, it is not anticipated that the Converter Station itself will affect the explosives licence.

However, it should be noted that the routing of any cabling between the landfall and the Converter Station may have implications for the explosives licence, particularly during the construction phase.

The Explosives Inspectorate would therefore wish to be consulted further as the project develops, especially in relation to works within the area indicated on the map below:



Please contact us if you require any further clarification.

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

CEMHD NSIP Consultation Team



Historic England

[REDACTED]
PINS Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Our ref: PL00799336

Your ref: EN0210009

Telephone: 0207 973 3748

Dear [REDACTED]

**Re: TARCHON INTERCONNECTOR PROJECT ENVIRONMENTAL IMPACT ASSESSMENT
SCOPING REPORT**

**Application by for an Order granting Development Consent for the Tarchon
Interconnector Project (the proposed development)**

Thank you for your letter of 8th April 2026 with a formal request for a scoping opinion in relation to the above application. Historic England (HE), as the government's lead advisor on the historic environment, would like to offer comments on this proposal, taking into consideration the information provided by the applicant: TARCHON INTERCONNECTOR PROJECT ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT.

We are aware that this EIA Scoping exercise for the proposed Tarchon Interconnector project is in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the requirements on Nationally Significant Infrastructure Project (NSIP) to consult interested parties, such as Historic England.

Summary of HE comments

Historic England is the Government's lead advisor on the historic environment, and we are a non-departmental public body sponsored by, and reporting to the Secretary of State for Culture, Media and Sport. For the purposes of Section 42 of the Planning Act 2008 and Regulation 11 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, we are a statutory consultee.

This development could, potentially, have an impact on several designated and non-designated heritage assets and their settings in the area around the proposed development. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk



the proposed development might have upon those elements which contribute to the significance of these assets.

We recommend further assessment as part of the EIA process and support ongoing liaison with this office as results emerge and design solutions are explored.

The Proposed Development

This consultation relates to the Tarchon Interconnector Project, which is considered to be a Nationally Significant Infrastructure Project. The applicants are Tarchon Energy Limited.

The overall proposed development is for a new high-capacity electricity interconnector linking Essex, East Anglia, United Kingdom (UK), and Germany comprising both onshore and subsea electricity cables and associated infrastructure, with an indicative total length of approximately 800 kilometres (km) across all jurisdictions. If consent is granted, construction is anticipated to last 60 months (5 years) with the interconnector operational in 2034.

The project encompasses an English Onshore Scheme (EOS) in Essex, a UK marine scheme (UKMS), a Dutch and German marine scheme, and a German onshore scheme. HE is commenting on the EOS and UKMS (collectively known as ‘the UK Scheme’). The EOS comprises proposed landfall, onshore HVDC and HVAC cables, a Converter Station, and grid connection works to National Grid’s East Anglia Connection Node (EACN) substation northeast of Colchester. The UKMS covers c.12 nautical miles (nm) from shore and the UK Exclusive Economic Zone (EEZ) up to the UK – Netherlands median line.

The offshore elements extend to the boundary of the UK EEZ with the Netherlands. Two potential cable corridors into Netherlands waters are currently being considered, though only one is required. The total length of the UKMS will be confirmed following further refinement of the offshore route, with current estimates being approx. 280km maximum total length.

A landfall area has been identified in Tendring District. The precise landfall location will be subject to further assessment work. It is anticipated that the connection to the National Grid will be at National Grid’s East Anglia Connection Node (EACN). We acknowledge that the infrastructure for EACN does not form a part of the Tarchon project.

The onshore scoping area comprises a large area of land, as the ‘Rochdale Envelope’ strategy has been used (2.2) to undertake the assessment, meaning the scheme will not exceed the impacts outlined here.

We note that all onshore cables will be buried to minimise permanent visual impact, as opposed to using overhead lines. The onshore HVDC cable route will be up to 20 km long and will be installed between the UK Landfall and Converter Station, while the onshore HVAC cable route will be up to 5 km long. A fibre optic cable is to be included alongside both HVDC



and HVAC cables. The final location of the converter station is yet to be determined. It will be sited within 5km of the EACN. The EOS Scoping Boundary provides a wide corridor in light of this, with the boundary refined as the scheme progresses. At present, the intent is to pull cables through High-Density Polyethylene (HDPE) ducting installed using a trench (trenchless or open trench) method. This is yet to be confirmed.

The design envelope for the maximum site area for the Converter Station is 10 hectares for construction and 7.5ha for permanent platform footprint (Table 2-6). The proposed building substructures (2.4.6.4; five buildings total) are typically predominantly steel framed structures with the tallest being 26m high. In addition, there would be unhoused equipment, such as transformers. Lightning masts up to 4m taller than the tallest structure may also be constructed.

Regarding a proposed Maximum Design Scenario (MDS) for offshore works, we note that the maximum undersea cable trench width could be 10m and that further assessment will follow in any subsequent Preliminary Environmental Information Report (PEIR), with seabed cable burial expected to be 3m as necessary to avoid mobile bed forms (i.e. sand waves). However, if due to seabed conditions, burial is not possible that cable protection or armouring will be used, such as mattresses or rock berms. Furthermore, if crossing shipping navigation channels installation could be down to a depth of 24m

Historic England Advice: General Comments

The historic environment is a finite and non-renewable environmental resource which includes designated and non-designated heritage assets, conservation areas, historic landscapes and sites of historic and evidential interest. It is a rich and diverse part of England's cultural heritage and makes a valuable contribution to our cultural, social and economic life.

We confirm that historic environment represents a potentially significant issue in EIA terms, for both onshore and offshore elements, and confirm our view the historic environment should be 'scoped in' to the assessment. We agree that 'marine archaeological and cultural heritage' receptors are fully scoped into the EIA exercise, including any Preliminary Environmental Information Report (PEIR), for this proposed project.

The promoters' consultants have engaged with Historic England on the scheme since 2025 and we welcome their intention to maintain liaison with us as the proposals develop. Broadly speaking we have been supportive of the approach taken by the applicant to date with regards to the historic environment. We appreciate it is a long linear scheme which encompasses multiple different elements of development. Different impacts on the historic environment may therefore be expected depending on the type of infrastructure required. We welcome the commitment to engage professional, accredited and experienced built heritage and archaeological consultants in the preparation of the ES, so that full consideration can be taken of known and presently unknown heritage assets.



Where impacts are necessary and unavoidable, we would want to ensure that alternative options have been considered, that the interventions are the minimum necessary, and that harmful impacts are fully justified.

We are aware that a project design Rochdale Envelope approach is being used to provide flexibility in any consent obtained. The adoption of a realistic worst-case scenario will enable the Project's stakeholders and the Secretary of State to be confident that the environmental impacts of the Project would be no greater than those identified in the Environmental Statement (ES). We acknowledge that there are gaps in the data and analyses that have been presented and that this is to be anticipated at this stage, however, we consider further assessment is necessary in order to provide sufficient data for the ES and to ensure a rigorous examination. We recommend further archaeological surveys and assessment are undertaken prior to the submission of the full ES and in sufficient detail to inform the DCO application.

The results of desk-based assessments, geophysical surveys, trial trenching, geo-technical works, setting analysis and any other relevant assessments should inform the Cultural Heritage chapter of the ES. We appreciate there can be factors that limit access and availability of land however early evaluation is key to accurate assessment of significance and magnitude of impact. We would recommend that the available resources are focused on areas where there is a high archaeological potential, where the route is highly constrained and where there are limited mitigation options available. Modifications to the route might be necessary in response to the results of the surveys and assessments.

We appreciate that the necessity for some of the works which might cause harm will be reviewed and that the 'worst case' scenario is being offered here. We strongly advise that alternative options are considered at an early stage, and we would be happy to advise further in that process. We welcome the opportunity to participate through Expert Topic Groups (ETGs) which we appreciate are likely to be designed and managed thematically e.g. for either onshore or offshore as described in Chapter 19 (paragraph 19.4.1.7).

We encourage the Applicant to ensure that access to data and programmes of analysis allow for results to be presented during the EIA exercise, ideally as part of a PEIR consultation, and subject to discussion through facilitated ETG processes.

Although we understand that the Tarchon Interconnector project is distinct from other projects, such as Five Estuaries Wind Farm and Norwich to Tilbury, with separate ownership/shareholders, we welcome the co-ordination of stakeholder engagement, construction, infrastructure and operations plans, where this is practicable and feasible. We would encourage a co-ordinated approach, which has the potential to minimise environmental impacts for both projects.



We acknowledge that the location of the EACN has not yet been confirmed by National Grid. As a result, the proposal has defined a very large onshore area of study. This approach limits the response, in terms of onshore works, to only very general comments at this stage.

We appreciate the statement made in Chapter 2 (Project description) Table 2-1 (Key components of the UK scheme) regarding the designing of the undersea cable route to avoid major seabed obstacles, which we consider to be a strategy inclusive of heritage assets. We add that coordination with local curatorial advice will remain relevant to this project for proposed works across or within any intertidal area such as the proposed landfall location of the cables south of Harwich and north of Hamford Water (Essex).

Comments in relation to the Scoping Report: Settings

We appreciate that attention will be given to assessment of the settings of heritage assets and will be addressed within respective chapters of the ES for onshore and offshore archaeology and cultural heritage.

It is likely that the proposed onshore substation will have an impact on the significance of designated and non-designated heritage assets, in terms of the changes to their settings and their relationships to the wider landscape. We recommend a Zone of Theoretical Visibility (ZTV) for the favoured location is produced in relation to the designated heritage assets, and any significant historic landscape elements, and used to inform the selection of potential viewpoints to assess the impact of the proposed substation on the setting of heritage assets. The assessment should define a study area according to the sensitivity of the receiving environment and the potential impacts of the project.

Given the suggested parameters for the Converter Station of up to 5 main buildings of maximum heights and widths of up to 26m and 250m respectively, as well as lighting masts up to 30m (indicated on Table 2-6 of the Environmental Impact Assessment Scoping Report), the proposals are likely to have an impact on the setting of the grade II* listed Church of St Mary (Little Bromley) (LEN 1337175). We are pleased to see that this has been included in the assessment.

Although included separately in the document, we would also suggest that grade II listed The Old Rectory (LEN 1111420) and Little Bromley War Memorial (LEN 1493299) are also assessed for their group value alongside the grade II* listed Church of St Mary. The settings impact to be undertaken should consider the dynamic experience of these assets, which would then allow to consider appropriate measures for mitigation.

We note that a 500m buffer has been proposed but the zone of theoretical visibility could be considerably larger, and this cannot be agreed until the location of the proposed substation has been published. We also look forward to constructive engagement with the applicant to agree the proposed key viewpoints for visualisations.



The setting of heritage assets is not just restricted to visual impacts, and other factors should be considered, in particular: noise, vibration, light, odour, traffic assessments, during construction and operation. In terms of the assessment of setting, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England, therefore, recommends these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss to set out ‘what matters and why’ in terms of the heritage assets’ significance and setting, together with the effects of the development upon them. In addition, the appreciation of the value of the historic environment should not rely solely on an appreciation of the location of designated heritage assets but consider the interactions with the wider landscape.

The assessment should be prepared and submitted following the approach set out in Historic Environment Good Practice Advice in Planning Note 3, [The Setting of Heritage Assets](#) (2017).

Comments in relation to the Scoping Report: Onshore archaeology

We agree that the scoping report has taken into consideration both designated and non-designated heritage assets and that the assessment methodologies are generally appropriate – and we offer specific comments below.

Because the submission covers a large onshore scoping area, it is hard to offer more than broad comment on likely effects at this stage. No one cable corridor has been defined, and no substation location has been confirmed.

The onshore study areas (comprising both the Archaeology and Coastal Study Areas) including the 500m buffer, contains three Scheduled Monuments, 82 Listed Buildings, and three Conservation Areas (11.5.1.3). It is good to see a breakdown has been provided for the designated heritage within each of these study areas as well as the data for non-designated heritage assets from the Historic Environment Record (Tables A11-1-1, A11-1-2).

We note the sources of information to inform the baseline for the study area (Vol 2, Chapter 11). No results have been presented at this stage, except for Annex A11-1. We note that no preliminary assessment of the value of cultural heritage assets within the study area has been undertaken, presumably because of the very large size of the scoping area. At this stage, no systematic archaeological investigation has been undertaken.

In terms of baseline information, we recommend additionally consulting the Historic England [Archaeology Mapping Explorer](#). We also recommend referring to the updated version of the [Regional Research Framework](#).

The ES should provide a detailed archaeological baseline; only a detailed and comprehensive understanding of the below-ground archaeological resource will allow for



impact to heritage to be properly mitigated. There is significant potential for further nationally important sites to be discovered within the scoping area. We are also concerned about the impact of the onshore cable route, the area of the proposed substation and in the areas of construction compounds and laydown areas.

We would recommend that the resolution of the baseline information is considered carefully. For example, a resolution of 1m is the basic minimum needed for archaeological assessments using LIDAR, but where greater detail is required, higher resolution is preferable (Historic England, [Using Airborne LIDAR in Archaeological Surveys](#), 2018). For the ES desk-based assessment, this should also include the dataset from [CITiZAN](#). In terms of aerial photographs, all potential archaeological features recorded by aerial photography in the scoping area should be accurately plotted and assessed.

We would highlight that damage may occur to waterlogged archaeological and palaeoenvironmental remains if there are changes to groundwater levels, or if heat is emitted from the buried cables. We are pleased to see that this issue has been discussed in Chapter 11 (Archaeology and Cultural Heritage, Section 11.7.3.2). We would recommend that the Historic England document '[Preserving Archaeological Remains](#)' (2016) is referred to. It should be noted that the use of cable protection in the UKMS area of the proposed scheme (Table 2-1 & Section 2.4.3.4) could result in localised changes to the coastal processes. This in turn could result in either increased erosion or accumulation of sediments. The erosion of sediments could result in the exposure and/or damage of buried archaeological remains and should be considered as part of the project assessment.

Table 2-1 and Sections 2.4.4.7 & 2.4.5.6 state that HDD will be used at the Cable landfall location. If this technique is to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains

Geophysical survey should be undertaken across the application area to ensure the nature, extent and survival of subsurface archaeological and geoarchaeological remains are established, and presented in the ES.

We also recommend trial-trench evaluation should be carried out in the areas of construction compounds and temporary access routes, as well as in pinch-point locations along the proposed onshore cable route and to test the results of any significant concentrations of archaeological remains (as defined by the preceding archaeological surveys including the geophysical work).

This iterative approach should inform the scheme design and routing so that the principle of harm avoidance is addressed and will further help enable any appropriate scheme of mitigation to be prepared. We recommend that all supporting technical heritage information (full survey reports) is included as appendices to allow the information to be critically assessed.



We acknowledge that mitigation of unavoidable direct physical impacts will include archaeological investigation, recording, analysis and dissemination of the results.

We would also recommend specialist palaeoenvironmental assessment is undertaken where the desk-based assessment, and other surveys, indicate there is potential for the survival of palaeoenvironmental remains. This will enable the nature, extent and survival of subsurface archaeological and geoarchaeological remains to be adequately established, and presented in the ES. This will ensure that a detailed and informed archaeological mitigation strategy can be prepared and agreed.

We recommend that geoarchaeological considerations and requirements are built into any geotechnical investigations that are carried out to ensure that opportunities are maximised where possible. This should include providing the geoarchaeologist with direct access to the core material rather than just to the logs or to extruded samples.

The onshore scoping area also has potential for encountering Pleistocene and Holocene deposits of archaeological significance. Consequently, we recommend that a Palaeolithic desk-based assessment is also prepared. The nature and scope of specialist Palaeolithic survey and assessment should be devised through consultation with the archaeological advisers at Essex Place Services. This information may not be adequately represented in the Essex Historic Environment Record, by shallow geophysics or even by shallow evaluation trenches.

An effective method for identifying the potential depth and character of Palaeolithic archaeology would be to undertake a preliminary deposit model as part of the desk-based assessment. This should be prepared by a geoarchaeologist based on any available stratigraphic information, including archaeological and geotechnical data using Historic England's [guidance](#). The deposit model will help to illustrate the depth, characteristics and potential of the deposits of archaeological interest and should inform any subsequent evaluation trenching, borehole sampling and/or geophysical survey. The deposit model will also help to guide elements of the proposed mitigation strategy, such as the choice of geophysical techniques that are utilised. For example, techniques that investigate deeper deposits of archaeological interest should be considered, such as electromagnetic induction (EMI) or electrical resistivity (ERT).

It is noted that the cables will be underground (buried) in the EOS and it is stated that the applicant is considering trenchless technologies such as HDD (2.4.4.7 and 2.4.5.6). If this technique is to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains. This needs to be considered in the ES, and mitigation included in the WSI for archaeological mitigation.



Several sections within the scoping report contain information that may also aid the assessment of the archaeological potential of the development area, for example, information about the hydrology, flooding, and geology (Chapter 7). For example, any intrusive works such as boreholes that are collected for ground investigation works, and a conceptual model will potentially add to the understanding of the historic environment, as well as the likely preservation conditions that may be present on the site. The conceptual model will also add to the understanding of how the proposed development may impact the historic environment.

Some of the work associated with the proposed Project may impact on the groundwater levels or movement of water through deposits. For example, the need for foundations for the substation, compression of deposits through the construction of elements or the movement of vehicles, the reduction in recharge values, or the need to dewater areas during construction. It is important to understand how changes to the groundwater levels, water quality or the movement of water through deposits may impact the historic environment. For example, changes to groundwater levels or the mobilisation of contaminants along different pathways may impact the preservation of archaeological structures, features or remains, including palaeoenvironmental remains. In addition, compression of deposits or the creation of pathways for contaminants or oxygen could potentially damage deposits/remains of archaeological interest or alter the preservation conditions on the site. The impact that this work may have on the historic environment needs to be considered as any changes may affect preservation conditions within the area of the proposed project or in nearby deposits, which in turn may result in the damage and/or loss of archaeological remains. For example, the potential impact of dewatering on any well-preserved, waterlogged archaeological and palaeoenvironmental remains needs to be investigated along the onshore cable corridor.

The Historic England document [Piling and Archaeology](#) (2019) should be also referred to as some of the elements of the development will involve piling.

The nature and scope of archaeological evaluation should be devised through consultation with the archaeological advisors at Essex Place Services. We would be pleased to provide any further advice, and comment on the proposed methodology, as well as advising on the significance of the results. In our view, this will provide the Examining Authority with the appropriate level of information to determine the application, confident that the historic environment has been adequately assessed and that the proposed mitigation measures will be effective and proportionate to the significance of heritage assets.

Considering the amount of evaluation fieldwork that is likely to be required, we strongly recommend that discussions about this fieldwork commence at the earliest opportunity and that liaison over results and any further steps remains close throughout the programme. We also advise that a timetable is agreed for each stage of the assessment process, especially because the onshore transmission substation location has yet to be confirmed by National Grid.



Historic England's Regional Science Advisor is pleased to provide technical advice and guidance concerning the appropriate techniques for archaeological and palaeoenvironmental assessment. I append her detailed comments as Appendix 1 to this letter.

Comments in relation to the Scoping Report: offshore archaeology

Chapter 13 (Physical environment) describes the Outer Thames Estuary as characterised by large subtidal sandbanks and channels, which are aligned with tidal streams (i.e. northeast – southwest) and that "...locally, there is great complexity in the multiple channels and banks within the Greater Thames Estuary, which is due to lateral migration of the sandbanks and associated vertical change along the bank and channel boundaries." (paragraph 13.5.2.4). We highlight this description as it illustrates the risk that presently known elements of the historic environment e.g. shipwreck might presently be buried and the likelihood that this project could encounter presently unknown heritage assets (e.g. vessels stranded on bathymetric features as illustrated in Figure 13-2). A matter of relevance when considering the presence of the Harwich Deep Water Channel that provides shipping access to Harwich and Felixstowe, as indicative of maritime activity that will have occurred throughout this area for a considerable period of time.

Chapter 19 (Offshore Archaeology and Cultural Heritage) explains the potential significant effects on identified "receptors" during the proposed project phases of construction, operational and decommissioning. We are also aware that the Study Area used for this Scoping Report is defined tightly as a 100m buffer around the extent of the UKMS Scoping Boundary up to the Mean High Water Spring (MHWS) mark at the proposed coastal landfall location

Section 19.5 (Baseline conditions) states that there are no designated heritage assets present within the Study Area. However, in reference to Protection of Military Remains Act 1986, it is important to clarify that any military aircraft as might be encountered by this proposed project will automatically be afforded Protected Place status under the 1986 Act

Section 19.4 (Consultation and engagement) helpfully highlights advice already received from Historic England, in particular that the Applicant's professional, accredited experienced archaeological advice service contracted to support preparation of any subsequent PEIR and Environmental Statement (ES) should have direct access to geotechnical material rather than just the logs (i.e. text description). It is important to highlight that the capacity to have present a specialist geoarchaeologist will optimise laboratory work when splitting and opening geotechnical materials.

I include detailed comments from my Marine Planning colleagues as Appendix 2 to this letter.

Comments in relation to the Scoping Report: Cumulative impacts and mitigation

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk



We note the proposed cumulative impact assessment (11.7.4). This will need to be considered in terms of cultural heritage once the study area has been narrowed down. We look forward to constructive engagement with the applicant, at an early stage, to agree the proposed key viewpoints for visualisations to assess the cumulative impact of the Project on designated heritage assets and archaeological remains.

We appreciate the attention and reasoning offered in section 19.7.3 (Cumulative and Transboundary Effects) and the identification of relevance to the historic environment. We therefore agree that inter-related effects should be included within the EIA exercise for this proposed development.

By following planning policy and guidance we would expect the project to be creative in how it might offer opportunities for the enhancement of heritage assets, and how the project might deliver public (heritage) benefit. The ES should aim to make clear public heritage benefits and outreach as part of planned mitigation.

We would advise the ES should put forward proposals for the use, display and interpretation of archaeological evidence that will be revealed by the development and to provide enhancement to heritage assets and secure wide heritage benefits as part of the Project and we would be pleased to provide advice about potential heritage schemes.

Summary

Thank you for sharing the scoping documents with Historic England. We have provided comments above both detailed and more generic in nature. Where appropriate we have also made recommendations to improve the final ES and DCO application and we also recommend further engagement with Historic England before the ES is finalised.

We agree with the assessment provided in this EIA Scoping Report regarding the scoping in of offshore archaeology and onshore cultural heritage

As set out in our detailed advice above, we have concerns about the proposed strategy for assessment of onshore archaeology in the Scoping Report. In our opinion, this strategy could fail to adequately assess the full extent and significance of archaeological remains within the EOS application area. There is a considerable risk that nationally important heritage assets, in the form of previously unknown buried archaeological deposits, could be missed by the proposed strategy.

We strongly recommend that the geophysical survey should be undertaken across the whole EOS application area, rather than targeted or priority areas. This should be followed by trial-trench evaluation in the area of key anomalies and in the areas of construction compounds, as well as in pinch-point locations along the corridor route. Palaeoenvironmental assessment should be undertaken where the desk-based assessment, and other surveys, indicate there is potential for the survival of palaeoenvironmental remains.



Historic England

We note the large onshore scoping area with no defined cable corridor and no substation location yet announced. We have, therefore, been unable to provide many specific comments at this stage and await further liaison over the scheme as it develops.

We should like to stress that this response is based on the information provided in this consultation. For the avoidance of doubt, this does not affect our obligation to provide further advice and, potentially, to object to specific proposals which may subsequently arise where we consider that the scale, massing and detailed design would have an adverse effect upon the immediate and wider historic environment.

If anything is unclear, please do not hesitate to contact me directly

Yours sincerely

[Redacted Signature]

Inspector of Ancient Monuments (Essex and Herts)
Historic England

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data please visit: historicengland.org.uk/terms/privacy



Appendix 1 Detailed HE Science Adviser Comments

Volume 1: Introductory Chapters

Chapter 2: UK Project Description

Table 2-1 outlines the key components of the UK Scheme. Several of the elements will have a below ground impact. Information is needed about the depths of impact and the methods of construction/installation in order to understand the potential impact on the historic environment.

In addition to physical damage to below ground archaeological remains, the construction could impact the local water environment. This could impact the preservation of nearby archaeological sites. Any changes to the preservation of a site could lead to the degradation and/or loss of vulnerable archaeological remains, such as items made of wood, leather or organic environmental remains. We are pleased to see that this issue has been discussed in Chapter 11 (Archaeology and Cultural Heritage, Section 11.7.3.2). We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to:

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>.

It should be noted that the use of cable protection in the UKMS area of the proposed scheme (Table 2-1 & Section 2.4.3.4) could result in localised changes to the coastal processes. This in turn could result in either increased erosion or accumulation of sediments. The erosion of sediments could result in the exposure and/or damage of buried archaeological remains and should be considered as part of the project assessment.

Table 2-1 and Sections 2.4.4.7 & 2.4.5.6 state that HDD will be used at the Cable landfall location. If this technique is to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.

Table 2-2 outlines the maximum design scenario for the Offshore Cables (HVDC). This states that the standard burial, the cables will be installed up to 3m in depth, but in special cases the cable will be buried up to 24m below non-mobile reference level (NMRL). Investigations will need to be carried out in the cable corridor to investigate the



archaeological potential of the impacted areas. This may include geophysical surveys and geoarchaeological work in the first instance to develop a deposit model.

2.4.2.6 lists the pre-installation activities that will be required before subsea HVDC cable systems are installed. This includes surveys, grapnel runs, pre-sweeping of sandwaves and UXO clearance. It should be noted that these activities could impact archaeological features and remains present in the area, both the buried and near-surface remains.

2.4.2.8 lists the geophysical and geoarchaeological survey methods that will be carried out to confirm seabed conditions. The techniques listed would also provide valuable information for the archaeological assessments and we are therefore pleased to see that the results will be shared with archaeological specialists (Chapter 19, Marine Archaeology and Cultural Heritage Section 19.5.2.21).

2.4.2.9 notes that visual inspections may also be undertaken in the UKMS using a Remotely Operated Vehicle (ROV). Information obtained during this survey work may aid the archaeological assessments. We are therefore pleased to see that this work will be discussed with the archaeological specialists to ensure that opportunities are maximised to obtain useful information (Chapter 19, Marine Archaeology and Cultural Heritage).

Table 2-4 provides the Maximum Design Scenario for the UK Landfall and Associated Components. It is noted that the design cannot be finalised until the assessments have been undertaken. It is noted that trenchless techniques and open cut trenching will potentially be utilised. We would recommend that a deposit model is produced for the landfall area in order to characterise the sequence of deposits, to understand their potential as well as the potential impacts of the proposed scheme. We would recommend that the following Historic England documents are referred to:

Geoarchaeology (2015): <https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>.

Deposit Modelling and Archaeology (2020): <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>.

Tables 2-5 and 2-7 summarise the Maximum Design Scenarios for the Onshore Cable (HVDC and HVAC respectively). This states that the cables will be installed using the Open cut approach and will be up to 2.0m deep. The cables will therefore impact on any below-ground heritage that may be present within the proposed cable corridor.

Table 2-6 summarises the Maximum Design Scenario for the Converter Station. This information provided relates to the size and height of the structure and not on the

foundations/below ground impact. This information is needed in order to understand the potential impacts to buried archaeological remains that may be present.

It is stated that ground investigations will be carried out as part of the pre-construction works (e.g. at the Converter Station, Section 2.4.6.5; in the Onshore Cable Corridor, Section 2.4.7.5). As stated above, the ground investigation data can provide valuable information to aid the archaeological assessments and help develop deposit models. We would therefore recommend that the Geotechnical engineers coordinate this work with the project Archaeological/Geoarchaeological specialists in order to maximise opportunities to recover information.

Volume 2: Onshore Environment

Chapter 7: Ground Conditions and Contamination

Information within this chapter will be of value to the archaeological assessment and we would recommend that the Geotechnical and Archaeological specialists collaborate and share data. This will allow opportunities to maximise information, reduce the risks of duplication of effort and aid the development of deposit models.

7.5.1.2 describes the Made Ground present in the proposed development area. It should be noted that the BGS records were not recovered for archaeological purposes and that Made Ground can contain deposits and remains of archaeological interest.

A number of water features are recorded in the Study Area, including the Holland Brook and Wrabness Brook (Section 7.5.6.1). These areas may have been preferred by populations in the past due to the resources that they offer. In addition, water features can be associated with alluvium and peat, which may preserve archaeological and palaeoenvironmental remains of interest. The archaeological potential of these areas will need to be investigated in order to understand the potential impacts of the proposed scheme.

7.5.9.1 outlines the sensitive receptors within the Study Area that will be considered. We would recommend that the Archaeology and Cultural Heritage are also included in the assessments of impact. Contamination may alter the preservation of nearby archaeological sites, leading to the degradation and/or loss of remains. Contamination may also make sites inaccessible for further work, either due to health and safety reasons or by limiting the scientific analysis that could be carried out on archaeological materials in the future (e.g. radiocarbon dating). We would recommend that the Historic England document ‘[Land Contamination and Archaeology](https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/)’ (2017) is referred to: <https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/>.

Chapter 8: Water Environment

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk



Information within this chapter will be of value to the archaeological assessment. The information will help identify deposits that may preserve waterlogged archaeological and palaeoenvironment remains as well as identify the risks of changes to the local water environment and through contamination. We would recommend that the Hydrologists discuss this work with the Archaeologists in order to maximise opportunities. We would also recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to:

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>.

Table 8-9 notes that Alluvium is present within the Study Area. Alluvium has the potential to also contain peat, which is of high archaeological and palaeoenvironmental potential. Peat can preserve organic archaeological and palaeoenvironmental remains but can be vulnerable to changes in the local water environment. This can impact the preservation of remains that can lead to their degradation and/or loss.

It is noted that some of the water bodies have been modified over time (e.g. Section 8.5.1.32 states that Ramsey Creek was straightened), but pockets of peat and alluvium may still be present relating to their earlier position and to earlier used of the landscape.

Section 8.6.1.2 states that a source-pathway-receptor framework will be applied to identify and evaluate potential effects on water environment receptors arising from the construction, operation and decommissioning of the proposed development. We would recommend that the potential impacts on the historic environment are also considered as part of this work in terms of potential changes to the preservation of waterlogged remains and through contamination.

Table 8-18 states that there are risks of temporary changes to the groundwater levels from excavation, dewatering and drilling. Changes to the groundwater levels could result in the degradation of waterlogged archaeological remains that may be present within the proposed Study Area. The effects of dewatering may be felt outside of the red-line boundary of the proposed scheme, which should also be considered.

The extent of impacts to the groundwater levels will need to be determined so it is clear which archaeological remains may be impacted. Information would also be required about the severity of changes to the groundwater levels and how long it would take for levels to rebound and for stable conditions to return. This would help to understand the potential impacts on the historic environment. We would therefore recommend that the Hydrological and Archaeological specialists collaborate on this issue.

8.8.1.9 notes that groundwater level data for the Study Area is limited, and that additional Ground Investigation will be required to address the gaps and uncertainties in the current data set. We would recommend that this work is discussed with the

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk



Archaeological/Geoarchaeological specialists during the planning stage to ensure that opportunities are maximised.

Chapter 11: Onshore Archaeology and Cultural Heritage

Table 11-5 summarises the Embedded Mitigation measures for the Onshore Archaeology. This states that avoidance will be for primary mitigation approach, which is good to see.

11.7.2.4 states that preservation in situ is one of the main options by which impacts to archaeological remains can be mitigated. We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) should be referred to: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>. This will ensure that the strategy developed is appropriate for the site and the remains in question.

Where preservation is not possible, preservation by record through archaeological investigation will be carried out (Section 11.7.2.5).

11.7.3.2 outlines the potential effects of construction on the historic environment. We are pleased to see that the permanent effects to buried archaeological remains, either through damage or removal, or through changes to hydrology have been recognised.

Volume 3: Offshore Environment

Chapter 13: Marine Physical Environment

Table 13-3 outlines the elements scoped in to the Marine Physical Environment Assessment. This includes potential changes to seabed levels and coastal processes due to construction activities. This could lead to the erosion or accretion of sediments that could in turn affect buried remains and deposit located near the surface. Erosion could result in the exposure and/or damage of buried remains. We are therefore pleased to see that this issue has been discussed in Chapter 19 (Marine Archaeology and Cultural Heritage, Section 19.7.1.4).

Chapter 19: Offshore Archaeology and Cultural Heritage

As the development involves both the marine and terrestrial zones, we would recommend that the two project teams collaborate and communicate with each other. This would ensure that there is a consistency of approach in the investigations that span the terrestrial, coastal, intertidal and marine zones.

We are pleased to see that the potential for the presence of as yet undiscovered *in situ* palaeolandscape deposits, palaeochannels, prehistoric sites and finds located within the inundated palaeogeography (Section 19.5.2.21).



It is noted that the investigation of such material may be discovered from the assessment of vibrocores or boreholes recovered during pre-construction geotechnical surveys and the following geoarchaeological assessment. We are pleased to see that archaeological investigations will be incorporated into the geotechnical investigations.

19.5.3.7 states that sites located in the coastal and intertidal zones could include remains such as fish traps, piers, historic sea defences or more modern features dating to the World Wars. It should be noted that some of these remains may be composed of organic materials, such as wood, which can be difficult to identify using some of the standard non-intrusive techniques, such as geophysical surveys. Alternative approaches would therefore be required.

19.7.1.2 summarises the proposed embedded mitigation for the UKMS. The measures are what we would expect to see. We are pleased to see that the geophysical and geotechnical data obtained to inform the DCO submission will be assessed by a suitably qualified marine archaeologist (Section 19.7.1.9). It is also good to see that the investigations planned to take place post-consent will include archaeological input (for example, Sections 19.7.1.9 and 19.7.1.16).



Appendix 2

Detailed Marine Planning Unit Comments

Volume 1 Introduction

- 1) The proposed Tarchon Interconnector Project is for a High Voltage Direct Current (HVDC) electricity interconnector between England (Essex) and Germany via the Dutch marine sector of the North Sea (as illustrated in Figures 1-3 and 1-5). We understand that the two HVDC cables will have an associated fibre optic cable and that impact assessment will encompass all proposed works below MHWS, such as the offshore entry/exit point for trenchless cable installation either by Horizontal Directional Drilling or micro tunnelling on the Essex coast.
- 2) We appreciate the statement made in Chapter 2 (Project description) Table 2-1 (Key components of the UK scheme) regarding the designing of the cable route to avoid major seabed obstacles, which we consider to be a strategy inclusive of heritage assets. We add that coordination with local curatorial advice will remain relevant to this project for proposed works across or within any intertidal area such as the proposed landfall location of the cables south of Harwich and north of Hamford Water (Essex).
- 3) Regarding a proposed Maximum Design Scenario (MDS), we note that the maximum cable trench width could be 10m and that further assessment will follow in any subsequent Preliminary Environmental Information Report (PEIR), with seabed cable burial expected to be 3m as necessary to avoid mobile bed forms (i.e. sand waves). However, if due to seabed conditions, burial is not possible that cable protection or armouring will be used, such as mattresses or rock berms. Furthermore, if crossing shipping navigation channels installation could be down to a depth of 24m.
- 4) Paragraph 2.4.2.8 mentions the acquisition of geophysical and geotechnical survey data prior to cable installation to assist identification of seabed features inclusive of archaeology. Such assessment is crucial to inform any subsequent programme of route clearance so that deployment of grapnel, ploughs, injectors etc does not destroy, damage or otherwise disturb archaeological features, as may presently be unknown.
- 5) Paragraph 2.4.4.5 describes preparation of a Construction Environmental Management Plan (CEMP) and we suggest that the Applicant may want to expand the CEMP to reference (or append) any agreed Protocol for Archaeological Discoveries (PAD). We offer this advice because it is the role of a PAD to facilitate rapid communication if an unexpected archaeological



discovery occurs, for example, if “Open cut trenched technology” is used in the intertidal area (as described in paragraph 2.4.4.10).

- 6) The attention given in Chapter 4 (Approach to consultation), Section 4.4.3 to an Evidence Plan Process (EPP) is important as this should provide a structured and timetabled programme for engagement with Historic England. We welcome the opportunity to participate through Expert Topic Groups (ETGs) which we appreciate are likely to be designed and managed thematically e.g. for either onshore or offshore as described in Chapter 19 (paragraph 19.4.1.7).
- 7) We recognise the standard hierarchical approach to identifying mitigation measures as described in Chapter 6 (EIA Approach and Methodology), and while it is possible to apply “prevent” and “reduce” it is important to understand how the concept of “offset” and how this should be interpreted for the historic environment, as described within National Policy Statements, and as referenced in Chapter 5 (Legislation and planning policy) of this EIA Scoping Report.

Volume 3 Offshore Environment

- 8) Chapter 13 (Physical environment) describes the Outer Thames Estuary as characterised by large subtidal sandbanks and channels, which are aligned with tidal streams (i.e. northeast – southwest) and that “...locally, there is great complexity in the multiple channels and banks within the Greater Thames Estuary, which is due to lateral migration of the sandbanks and associated vertical change along the bank and channel boundaries.” (paragraph 13.5.2.4). We highlight this description as it illustrates the risk that presently known elements of the historic environment e.g. shipwreck might presently be buried and the likelihood that this project could encounter presently unknown heritage assets (e.g. vessels stranded on bathymetric features as illustrated in Figure 13-2). A matter of relevance when considering the presence of the Harwich Deep Water Channel that provides shipping access to Harwich and Felixstowe, as indicative of maritime activity that will have occurred throughout this area for a considerable period of time.
- 9) Chapter 19 (Offshore Archaeology and Cultural Heritage) explains the potential significant effects on identified “receptors” during the proposed project phases of construction, operational and decommissioning. We are also aware that the Study Area used for this Scoping Report is defined tightly as a 100m buffer around the extent of the UKMS Scoping Boundary up to the Mean High Water Spring (MHWS) mark at the proposed coastal landfall location.
- 10) Section 19.4 (Consultation and engagement) helpfully highlights advice already received from Historic England, in particular that the Applicant’s professional, accredited experienced archaeological advice service contracted to support preparation of any subsequent PEIR and Environmental Statement (ES) should have direct access to geotechnical material rather than just the logs (i.e. text description). It is important to highlight that the capacity to have present a

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 historicengland.org.uk



specialist geoarchaeologist will optimise laboratory work when splitting and opening geotechnical materials.

- 11) Section 19.5 (Baseline conditions) states that there are no designated heritage assets present within the Study Area. However, in reference to Protection of Military Remains Act 1986, it is important to clarify that any military aircraft as might be encountered by this proposed project will automatically be afforded Protected Place status under the 1986 Act.
- 12) The desk based review of available information summaries wreck records held by the UK Hydrographic Office (UKHO) and Historic England's National Marine Heritage Records (NMHR), as illustrated in Figure 19-1, which encompass charted locations (although the identity of the wreck might be unknown). In reference to consideration of record losses (i.e. when a vessel is known to have been lost, but a location is unconfirmed), we highlight that this demonstrates the importance of the archaeological analysis of marine geophysical survey data acquired for this proposed development. However, it seems from the statements made in paragraph 19.7.1.9 that analysis of either geophysical or geotechnical data specifically acquired for this proposed development has yet to occur and we confirm that analysis and interpretation of those data should be by an accredited, professional and appropriately experienced marine archaeological consultant. We therefore encourage the Applicant to ensure that access to data and programmes of analysis allow for results to be presented during the EIA exercise, ideally as part of the PEIR consultation and subject to discussion through facilitated ETG discussion. We also confirm that any further geophysical or geotechnical surveys undertaken, i.e. should consent be granted, will also require archaeological analysis and reporting, in reference to an agreed archaeological Written Scheme of Investigation, to inform design and delivery of the proposed Tarchon project.
- 13) Section 19.6 (Assessment methodology) draws important attention to the unique nature of historic environment receptors (paragraph 19.6.2.3 and subsection 19.6.3) and we agree with the matters addressed in section 19.7 (Potential effects and mitigation) regarding risks to either the known or unknown historic environment as could be impacted, directly or indirectly by this proposed development. In particular, that "...archaeological and cultural heritage receptors are finite, non-renewable and cannot adapt, tolerate or recover from direct impacts." (paragraph 19.7.1.2). Furthermore, we agree with the primary embedded mitigation measures described in Sub-section 19.7.1 (Embedded Mitigation and Good Practice Measures) and the statement that it is through the use of any agreed archaeological Written Scheme of Investigation (WSI), and not just its production (albeit in consultation with Historic England) that discharges any associated consent conditions.
- 14) We concur with Section 19.7.2 (Scoping Assessment) and the detail provided in Table 19-5 regarding matters to be scoped in, such as for construction,



Historic England

operational and decommissioning and associated potential impacts summarised as:

- seabed preparations; and
- physical disturbance activities including penetration of cable laying as well as repairs and removal.

15) We appreciate the attention and reasoning offered in section 19.7.3 (Cumulative and Transboundary Effects) and the identification of relevance to the historic environment. We therefore agree that inter-related effects should be included within the EIA exercise for this proposed development.

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

JNCC Reference: OIA-11490
PINS Reference: EN0210009
Date: 6 May 2026

By email: tarchoninterconnector@planninginspectorate.gov.uk

To whom it may concern,

Tarchon Interconnector Project, Tarchon Energy Limited, Environmental Impact Assessment Scoping Report (Ref: EN0210009)

Thank you for consulting the Joint Nature Conservation Committee on the Tarchon Interconnector Project Environmental Impact Assessment (EIA) Scoping Report from Tarchon Energy Limited (hereafter referred to as the Applicant), which we received on 8 April 2026.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We defer to our colleagues at Natural England for comments relating to territorial waters.

The advice below related to marine physical processes, offshore benthic ecology, marine ornithology and marine mammals. The following chapters were reviewed in providing this response:

Environmental Impact Assessment (EIA) Scoping Report Part 1 – Volumes 1 to 5, GBTARC-ENV-APE-AP-00042, dated 07/04/2026

- Volume 1, Chapter 1: Introduction
- Volume 1, Chapter 2: UK Project Description
- Volume 1, Chapter 3: Approach to Alternatives
- Volume 1, Chapter 4: Approach to Consultation
- Volume 1, Chapter 5: Legislative and Planning Policy Content
- Volume 1, Chapter 6: EIA Approach and Methodology
- Volume 3, Chapter 13: Marine Physical Environment
- Volume 3, Chapter 14: Benthic and Intertidal Ecology
- Volume 3, Chapter 15: Fish and Shellfish Ecology

- Volume 3, Chapter 16: Marine Mammal Ecology
- Volume 4, Chapter 22: Noise and Vibration
- Volume 4, Chapter 23: Ornithology
- Volume 5, Chapter 32: Approach to Cumulative and Transboundary Effects
- Volume 5, Chapter 33: Structure of the Environmental Statement
- Volume 5, Chapter 34: Summary and Conclusions

Please note that while JNCC have reviewed the above chapters of the EIA Scoping Report, we have provided comments only where appropriate. Where information presented lies outside of JNCC's remit, we have provided more general comments and defer to the relevant consultee.

General comments

JNCC would like to highlight our statutory remit is provision of advice on issues relating to nature conservation in UK offshore waters (beyond the territorial limit) and we defer to comments provided by Natural England (NE) for aspects relating to territorial waters. Given the remit of the Statutory Nature Conservation Bodies (SNCBs), we request that future submissions for the Proposed Development include this delineation in all supporting figures to aid in our provision of advice.

We acknowledge that the Applicant has referenced the "Nature conservation considerations and environmental best practice for subsea cables in English Inshore and UK offshore waters" guidance development by NE and JNCC multiple times within the Scoping Report. We would expect the Applicant to follow this document in all aspects of the assessment regarding pressure-receptor pathways.

JNCC acknowledge and commend the Applicant for the level of detail provided at this Scoping stage. However, we found the report to be lengthy and, at times, difficult to navigate. We therefore request that future documents submitted as part of the Proposed Development be presented in a more succinct and accessible format.

Designated Sites

Within JNCC's remit, the project Scoping Boundary overlaps with the Southern North Sea Special Area of Conservation (SAC) and Outer Thames Estuary Special Protection Area (SPA). Both sites have features sensitive to many aspects of cable laying operations, therefore we take this opportunity to emphasise the importance of assessing all potential impact pathways in combination with the Site Information Centres (SICs) for the Maine Protected Areas (MPAs) on the JNCC website available at: <https://jncc.gov.uk/our-work/offshore-mpas/>.

The Southern North Sea SAC is designated for the protection of harbour porpoise. The Conservation Objectives for this site are to ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for harbour porpoise in UK waters. In the context of natural change, this will be achieved by ensuring that:

1. Harbour porpoise is a viable component of the site;
2. There is no significant disturbance of the species; and
3. The condition of supporting habitats and processes, and the availability of prey is maintained.

The Outer Thames Estuary SPA is designated for the protection of the largest aggregation of wintering red-throated diver (*Gavia stellata*) in the UK, and foraging areas for common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*) during the breeding season. The Conservation Objectives for the site are to ensure that features remain in or reach favourable condition.

It is a priority under the Conservation of Habitats and Species Regulations 2017 to protect designated features of SACs and SPAs therefore, any route that presents the least likely environmental impact at the construction, operation and maintenance, and decommissioning phase of works should be prioritised. The government has also set a legally binding target of 70% of designated features within MPAs to be in **favourable condition** by 2042 with the remaining protected features to be in a **recovering condition** (available here: https://www.legislation.gov.uk/uksi/2023/94/pdfs/uksiem_20230094_en.pdf). Any additional impacts on the sites would hinder progress towards favourable status and may prevent them from achieving recovering condition, thereby preventing the achievement of this national target.

Volume 1: Introductory Chapters

Chapter 2: UK Project Description

We understand that the offshore component of the Proposed Development consists of up to 245km of High Voltage Direct Current (HVDC) cables from the Transition Joint Bay at the UK landfall to the border between the UK and Netherlands waters. The subsea cable system will consist of one bundle of up to two HVDC cables and a fibre optic cable. Associated cable protection such as rock berms, concrete mattresses or similar have also been included within the proposed development. JNCC's preferred scenario would be to avoid impact to any designated site by routing cables outside of sites or where not possible, the mitigation hierarchy be applied as follows (as set out in 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'):

- Minimise length of cable route through the site;
- Avoid or minimise crossings within sites;
- Where cable installation cannot avoid hindering the conservation objectives and there are no other means of proceeding, a Habitats Regulations Assessment will be required.

We note that the Applicant has included cable crossings within Table 2-1, the number of which will be confirmed in the Preliminary Environmental Information Report (PEIR) and later refined if required. JNCC advise that the Applicant should select the cable route which minimise crossings where possible.

The Applicant has provided a Maximum Design Scenario (MDS) for the offshore HVDC cables within Table 2-2, and we understand that further information will be provided within the PEIR and Environmental Statement (ES). We advise that when the PEIR is submitted, the Applicant has clearly defined the design parameters, presenting the worst-case scenario for each phase of the project. The Applicant has stated that government guidance on Rochdale Envelopes will be used to form the basis on which consent for the UK scheme will be sought. We advise that the Applicant explicitly states the maximum design parameters from the outset. This is a key requirement to enable us to understand how the MDS will translate to the worst-case environmental assessment.

The UK Marine Scheme (UKMS) Scoping Boundary has been described as intentionally broad to provide design flexibility at this early stage and will be refined as the Proposed Development progresses. JNCC recommends that where environmental sensitivities become evident during the survey programme (such as the presence of *Sabellaria spinulosa* reefs), consideration be given to retaining a wider boundary to allow for more options for micro-routing around these sensitivities.

We note in Section 2.7.1.2 that the Applicant states that “*the offshore cables and any external cable protection may be either fully removed or left in-situ*”. JNCC would like to highlight that our preference is for a clear seabed, especially with regard to infrastructure located within designated MPAs.

Volume 3: Offshore Environment

Chapter 13: Marine Physical Environment

Study Area

We note that the Study Area encompasses the UKMS Scoping Boundary plus an additional 16.5km buffer to either side, based on the maximum tidal excursion. JNCC agrees that this is an appropriate approach for coastal and marine physical processes. We defer to NE for comments on the Study Area for the intertidal component.

Potential Effects and Mitigation

JNCC agree with the approach of cable burial as the preferred means of cable protection and highlight that external cable protection should be minimised where practicable. Table 13-12 highlights that a Cable Plan (CaP) will be prepared to set out the proposed cable routing, target burial depths and additional cable protection measures informed by the Cable Burial Risk Assessment (CBRA). JNCC recommend that the potential for repeat passes of trenching and burying equipment be carefully reviewed as part of the Development Consent Order (DCO) application process and suggests that if this is included as potential mitigation, it is clearly detailed how and where this may be possible using information from the surveys and CBRA. All rock placement will need to be clearly justified against the CBRA risks to the cable and predicted burial success.

Scope of the Assessment

We agree with the impacts that have been scoped in and out of the assessment for marine physical processes.

Chapter 14: Benthic and Intertidal Ecology

Study Area

We note that the Study Area encompasses the UKMS Scoping Boundary plus an additional 16.5km buffer to either side, based on the maximum tidal excursion. JNCC agrees that this is an appropriate approach for benthic and intertidal ecology. We defer to NE for comments on the Study Area for the intertidal component.

Guidance

We note that the Applicant has referenced the “Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK Offshore waters” guidance developed by NE and JNCC multiple times throughout the Scoping report however, does not refer to it for this chapter. We recommend that the Applicant review and follow this document in all aspects of the assessment regarding pressure-receptor pathways.

The Applicant has indicated that the Marine Life Information Network (MarLIN) Marine Evidence-Based Sensitivity Assessment (MarESA) framework will be used in the assessment of benthic and intertidal ecology. We also recommend that the JNCC Marine Pressures-Activity Database (PAD) (available at: <https://jncc.gov.uk/resources/97447f16-9f38-49ff-a3af-56d437fd1951>) be used to inform potential impacts on benthic species and habitats.

Baseline Environment

JNCC advise that site-specific information is available for designated sites through our Site Information Centres which can be found here: <https://jncc.gov.uk/our-work/offshore-mpas/> and these may be used as an evidence base layer over any broadscale distribution modelling. This information can also be viewed on the JNCC MPA Mapper available at: <https://jncc.gov.uk/mpa-mapper/>.

Habitats of specific conservation interest

Within Section 14.5.2.17, the Applicant indicates the potential for biogenic reef features to be present, specifically *Sabellaria spinulosa*. We request that this habitat be avoided as much as practicably possible during the proposed development and advise that micro-routing be considered where this habitat is thought to be present.

Scope of Assessment

JNCC defer to our colleagues at NE for comments regarding impacts within territorial waters.

We agree with the majority of elements which have been scoped into the assessment for benthic and intertidal ecology. However, we do not support the exclusion of the following impact pathways:

- “Temporary increase in suspended sediment and sediment deposition” during the operational phase
- “Long-term habitat loss or alteration due to the addition of infrastructure” during the construction phase.

Regarding the first point, JNCC consider that temporary increases in suspended sediment and associated deposition should remain within scope for the operational phase. This is due to the likelihood that the Proposed Development will require maintenance activities throughout its operational lifetime. While the magnitude of effects may be lower than during construction or decommissioning, the potential for impact remains and therefore warrants assessment.

With respect to long-term habitat loss or alteration, JNCC are of the view that this impact pathway should be scoped into the construction phase. External cable protection is expected to be deployed during construction, and where such protection results in permanent habitat loss to a feature, the impact would be permanent in nature. As such, it is appropriate that this is assessed at the construction stage.

We note that Unexploded Ordnance (UXO) clearance has not been included within Table 14-6. We understand that this may be due to the Applicant's intention to apply for a separate licence for UXO clearance should this be necessary. We would expect the Applicant to assess a worst-case scenario for benthic impacts from UXO clearance, based on data collected during site-specific geophysical surveys.

Chapter 16: Marine mammal ecology

Introduction

Within Section 16.1.1.3: we note the Applicant states that a separate marine licence will be requested should UXO clearance be required, and that impacts associated with this activity have not been scoped into the EIA. We are content with this approach.

Site Specific Study Area

JNCC agree with the use of Effective Deterrence Ranges (EDRs) to determine the Zone of Influence (Zoi) as the basis of the Site Specific Survey Area. We also consider that using this method for all other species (as opposed to harbour porpoise only) is acceptable, given that harbour porpoise are considered to be the most sensitive species to underwater noise.

Regional Study Area

JNCC agree with the use of the Management Units (MUs) to consider the wider ecological considerations for marine mammals.

Guidance

We note that the Southall *et al.*, (2019) marine mammal noise exposure criteria have been referenced. JNCC highlight the National Marine Fisheries Service (2024) (available at: <https://repository.library.noaa.gov/view/noaa/66184>) thresholds should be used instead, as they reflect the most recent research and understanding of marine mammal hearing group noise exposure criteria. This recommendation also applies to paragraph 16.6.1.7.

Within Table 16-3, JNCC can confirm that the data sources referenced here are suitable for determining the baseline of the area.

Baseline Conditions

The marine mammal receptors taken forward to assessment are harbour porpoise, white-beaked dolphin, minke whale, grey seal and harbour seal. Bottlenose dolphins have been scoped out due to no sightings within the surrounding developments. We agree with this approach, as well as with the three other cetacean species being scoped in, due to there being sightings of these species within the area. We defer to NE for pinniped species.

Designated Sites

The UKMS Scoping Boundary overlaps with the Southern North Sea SAC, designated for harbour porpoise, and we therefore agree with this site being scoped into assessment. Two other cetacean sites (Southern Trench MPA and Sea of the Hebrides MPA) have also been included on the basis that they fall within the same Marine Mammal Management Unit (MMMU) of the species in question as the UKMS. JNCC agree that the MMMUs may be used to create an initial list of sites to be considered, but these should then be refined based on relevant impact pathways. We defer to NE for sites designated for seal species.

Future Baseline Conditions

It is stated that, “*At present, no other projects are identified that could influence the marine mammal baseline.*” However, it is not clear what criteria was used to identify other projects and how this conclusion was reached. JNCC recommend this information is included within the Environmental Statement.

Assessment Methodology

JNCC agrees with the use of a source-pathway-receptor approach with consideration of the sensitivity of the receptor and the magnitude of the impact.

For Tables 16-5 & 16-6, JNCC agree that the definitions of the different levels of sensitivity and magnitude are appropriate for marine mammals.

Scoping Assessment

In Table 16-8, we note that a precautionary approach has been used to determine the impacts to be scoped into the assessment, and that these shall be refined during the design phase. JNCC are content with this approach, although we recommend the impacts to be scoped out (and the justification for doing so) are stated within the Environmental Statement.

We agree with the pressures that have been scoped in and out of the assessment for cetacean species. Regarding potential impacts from Electromagnetic Fields (EMF), which is currently scoped out, we would welcome further discussion on this topic as evidence is emerging regarding harbour porpoise ability to detect EMF.

Cumulative and Transboundary Effects

JNCC would expect the Southern North Sea SAC daily and seasonal thresholds to be considered as part of the cumulative effects assessment. We recommend that all projects with a temporal overlap with the proposed works, and a spatial overlap (e.g., have an EDR extending into the Southern North Sea SAC), be included in the cumulative assessment. The worst case daily and seasonal footprints should be calculated to determine if there is potential for the thresholds to be breached. We also recommend that the prediction tool in

the JNCC Marine Noise Registry (available at: <https://mnr.jncc.gov.uk/>) and the Southern North Sea tracker be utilised to support the cumulative impact assessment.

Volume 4: UK Scheme Wide Environment

Chapter 23: Ornithology

Study Areas

JNCC advise that a buffer of 2km around the Area of Search is applied in light of evidence of vessel displacement of red-throated diver (Burt *et al.*, 2022; Burger *et al.*, 2019).

Consultation and Engagement

JNCC welcome the commitment to a seasonal restriction (November to March inclusive) for construction works within the Outer Thames Estuary SPA, plus a 2km buffer.

Potential Effects and Mitigation

JNCC also welcome the other mitigation measures proposed in Table 23-8. However, in our view and in alignment with the People Over Wind Ruling 2018 (available at: <https://www.nature.scot/doc/naturescot-guidance-note-handling-mitigation-habitats-regulations-appraisal-people-over-wind-cjeu>), these mitigation measures cannot be considered embedded at the screening stage, as the measures are intended to avoid or reduce the harmful effects of the project. The impacts of the project should therefore still be assessed through an Appropriate Assessment and any mitigation measures considered at this stage.

Scoping Assessment

JNCC agree with the impacts on offshore ornithology receptors that have been scoped in, however we do not agree that “Temporary disturbance and displacement (above water noise and physical presence)” can be scoped out for red-throated diver.

It is also noted that the impact of suspended solids has not been mentioned in the Ornithology chapter. As per the conservation advice for the Outer Thames Estuary SPA, ornithology features are sensitive to this pressure and this should therefore be scoped in.

Cumulative and Transboundary Effects

It is not clear from this section what the applicant is proposing regarding assessing transboundary effects. Initially, it is stated they will be scoped out, but subsequently it states that “*the potential for effects extending beyond UK waters cannot be discounted at this stage*”. JNCC request further clarity is provided during the PEIR.

Volume 5: Summary Chapters

Chapter 32: Approach to Cumulative and Transboundary Effects

JNCC are content with the approach regarding the cumulative effects and transboundary effects assessment as outlined in Chapter 30 and have no comments to make in relation to environmental receptors within our remit at this stage.

Chapter 33: Structure of the Environmental Statement

JNCC agree with the approach to the structure of the Environmental Statement as presented within this chapter. For ease, we suggest that the volumes be submitted as separate documents. To support a thorough assessment of environmental impacts, JNCC recommends that all relevant pressures be clearly listed within each chapter. While cross-referencing between chapters should be limited and only used where necessary – with clear signposting – care should also be taken to avoid unnecessary duplication.

References

Burger, C., Schubert, A., Heinänen, S., Dorsch, M., Kleinschmidt, B., Žydelis, R., Morkūnas, J., Quillfeldt, P. & Nehls, G. (2019). A novel approach for assessing effects of ship traffic on distributions and movements of seabirds. *Journal of Environmental Management*, Vol. 251, Article 109511 <https://doi.org/10.1016/j.jenvman.2019.109511>

Burt, M.L., Mackenzie, M.L., Bradbury, G. & Darke, J. (2022) Investigating effects of shipping on common scoter and red-throated diver distributions in Liverpool Bay SPA. Report number: CREEM-15198-2017-2. Provided to Natural England (Project ref. 23732)

National Marine Fisheries Service. 2024. Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0): Underwater and In-Air Criteria for Onset of Auditory Injury and Temporary Threshold Shifts. U.S. Dept. of Commer., NOAA. NOAA Technical Memorandum NMFS-OPR-71, 182 p.

Southall, B.L., Finneran, J.J., Reichmuth, C., Nachtigall, P.E., Ketten, D.R., Bowles, A.E., Ellison, W.T., Nowacek, D.P. and Tyack, P.L., 2019. Marine mammal noise exposure criteria: updated scientific recommendations for residual hearing effects. *Aquatic Mammals*, 45(2), pp.125-232.

Please contact me with any questions regarding the above comments.

Yours sincerely,

[Redacted Signature]

Offshore Industries Adviser

Email: [Redacted]@jncc.gov.uk

Telephone: [Redacted]

From: clerk@littlebromleyparishcouncil.gov.uk <clerk@littlebromleyparishcouncil.gov.uk>
Sent: 05 May 2026 10:58
To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>
Cc: info@tarchoninterconnector.com
Subject: Little Bromley Parish Council Response to the Pre-application Scoping Submission

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

To whom it may concern:

Little Bromley Parish Council – Formal Objection to the Tarchon Interconnector Proposal

Little Bromley Parish Council submits this objection in response to Tarchon's pre-application consultation. The Council's position is one of **strong and unequivocal opposition** to the proposal as currently presented. The scale, uncertainty, and cumulative impact of the Tarchon Interconnector—when combined with other major energy infrastructure planned for the area—pose **unacceptable and irreversible harm** to Little Bromley and its surrounding parishes.

As stated in the consultation document, *“the location for the converter station is not fixed yet, and a 5 km area has been designated for the site search”*, with the refined search area *“centred around Little Bromley.”* This alone creates a level of uncertainty that is incompatible with meaningful public consultation or proper assessment of local impacts.

1. Lack of Defined Site Location and Resulting Uncertainty

The proposal does not identify a specific site for the converter station or HVAC route. Instead, a broad 5 km search area has been outlined, with Little Bromley at its centre. This lack of clarity:

- Prevents residents, landowners, and the Parish Council from understanding the direct impacts on homes, farmland, roads, and community assets.
- Undermines the ability to assess environmental, visual, and transport effects.
- Creates prolonged anxiety and uncertainty for the village, which is already under pressure from multiple other infrastructure schemes.

A nationally significant infrastructure project should not proceed to this stage without a defined location. The current approach is **premature, incomplete, and procedurally unfair** to affected communities.

2. Severe Cumulative Impacts with Other Major Energy Projects

Little Bromley is already facing the prospect of hosting or being adjacent to:

- The **National Grid East Anglia Connection Node (EACN)** – a major new 400 kV substation hub.
- The **North Falls Offshore Wind Farm substation**, proposed next to the EACN.
- The **Five Estuaries Offshore Wind Farm substation**, also proposed in the same cluster.

Together, these developments would create **over 30 hectares of permanent industrial infrastructure** across Little Bromley, Ardleigh, and neighbouring areas. As your document states, *“The combined infrastructure will have significant cumulative effects... irrevocably alter the rural landscape... [and] fragment agricultural land.”*

This is not cumulative impact — it is **cumulative overload**.

3. Environmental and Landscape Harm to Little Bromley

The introduction of multiple substations and a converter station in close proximity would:

- Industrialise a rural landscape currently characterised by open farmland and historic settlement patterns.
- Introduce buildings up to **30 metres high**, plus lightning masts and associated infrastructure.
- Result in the loss of **Grade 1 agricultural land**, some of the most productive in the country.
- Create long-term ecological disturbance, habitat fragmentation, and altered drainage patterns, increasing flood risk.
- Generate years of construction traffic on narrow rural roads that are not designed for HGV movements.

As your document notes, *“this concentration of infrastructure will permanently alter the village’s skyline... turning it from a rural community into an industrialised zone.”*

This is a transformation that cannot be mitigated or reversed.

4. Over-Concentration of Energy Infrastructure in a Single Rural Parish

Little Bromley is a small rural village with limited road capacity, no strategic transport links, and a landscape that is highly sensitive to industrialisation. It is wholly inappropriate to concentrate multiple nationally significant energy projects in such a location.

The Parish Council objects to the **principle** of siting the Tarchon Interconnector in or around Little Bromley, given the existing and proposed infrastructure burden. No justification has been provided for why this area should host such a disproportionate share of regional and national energy infrastructure.

Conclusion

Little Bromley Parish Council **formally objects** to the Tarchon Interconnector proposal in its current form. The project:

- Lacks a defined site, preventing proper assessment.
- Adds to an already overwhelming cluster of major energy developments.

- Would cause permanent and unacceptable harm to the landscape, environment, agricultural land, and community.
- Represents an unjustified over-concentration of infrastructure in a single rural parish.

Until a **full, integrated, and cumulative assessment** of all concurrent energy projects is undertaken—and until alternative, less constrained locations are properly evaluated—the Parish Council will continue to oppose the Tarchon proposal in the strongest possible terms.

END

Please can you acknowledge receipt of this response?

Many thanks



Interim Parish Clerk and RFO

✉ clerk@littlebromleyparishcouncil.gov.uk 📄 www.littlebromleyparishcouncil.gov.uk

📄 Little Bromley Parish Council, c/o 9 Johnson Road, St Osyth, Essex CO16 8PL



Marine
Management
Organisation

Marine Licensing
Tyneside House
Skinnerburn Road
Newcastle upon Tyne
NE4 7AR

T +44 (0)300 123 1032
www.gov.uk/mmo

██████████
Senior Environmental Advisor
Tarchon Interconnector Case Team
Planning Inspectorate

Our reference: DCO/2025/00018
Planning Inspectorate Reference:
EN0210009

05 May 2026

Dear ██████████,

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 Tarchon Energy Ltd (the Applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the Proposed Development)

Thank you for your request for scoping consultation dated 08 April 2026 and for providing the Marine Management Organisation (MMO) with the opportunity to share our comments with you on the Tarchon Interconnector Project Environmental Impact Assessment (EIA) scoping request.

The MMO's role in Nationally Significant Infrastructure Projects

The MMO was established by the Marine and Coastal Access Act 2009 (the 2009 Act) to contribute 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 Welsh and Northern Ireland offshore waters by way of a marine licence¹. 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 Nationally Significant Infrastructure Projects (NSIPs), the 2008 Act enables Development Consent Order's (DCO) for projects which affect the marine environment to include provisions which deem marine licences².

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

¹ Under Part 4 of the 2009 Act

² Section 149A of the 2008 Act



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](#). Further information on the interaction between the Planning Inspectorate and the MMO can be found in our [joint advice note](#).

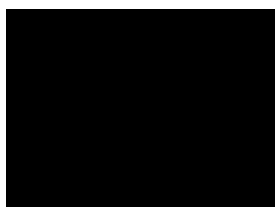
The MMO's comments on the Proposed Development

Please find attached the scoping opinion of the MMO. In providing these comments, the MMO has sought the views of our technical advisors at the Centre for Environment, Fisheries and Aquaculture Science (Cefas).

The MMO reserves the right to make further comments on the project throughout the pre-application 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,



Marine Licensing Case Officer

D [REDACTED]
E [REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)

Copied into response:

[REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk) (Marine Licensing Case Manager)
[REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk) (Senior Marine Licensing Case Manager)





Marine
Management
Organisation

Scoping Opinion

**Marine Works (Environmental Impact Assessment) Regulations 2007
("the Regulations")**

Title: Tarchon Interconnector Project

Applicant: Tarchon Energy Ltd

MMO Reference: DCO/2025/00018

Contents

Contents	3
1 Proposal	5
1.1 Project Background	5
2 Location	6
3 Rochdale Envelope	7
4 Scoping Opinion	7
4.1 General Comments	7
4.2 Marine Planning.....	8
4.3 Benthic Ecology.....	8
4.4 Coastal Processes.....	8
4.5 Fish Ecology and Commercial Fisheries	9
4.6 Shellfish.....	12
4.7 Dredge and Disposal.....	15
4.8 Underwater Noise.....	15
4.9 Nature Conservation.....	18
4.10 Marine Mammals.....	18
4.11 Seascape / Landscape	19
4.12 Marine Archaeology / Cultural Heritage.....	19
4.13 Navigation / Other Users of the Sea	19
4.14 Water Quality.....	19

4.15	Population and Human Health.....	19
4.16	Cumulative Impacts & In-Combination Impacts.....	19
5	Conclusion.....	19
6	References.....	20
7	Annex 1	22



1 Proposal

Tarchon Interconnector Project

1.1 Project Background

The Applicant, Tarchon Energy Limited, has submitted a Scoping Report for the Tarchon Interconnector Project. The Tarchon Interconnector Project is a high-capacity electricity interconnector linking Essex, United Kingdom (UK) and Niederlangen, Germany. The transmission system will operate primarily using High Voltage Direct Current (HVDC) technology to maximise efficiency over long distances. The proposed design allows a transfer capacity of up to 1.8 Gigawatts at the UK receiving end.

The Tarchon Project includes the English Onshore Scheme (EOS), the Marine Scheme, which is broken down into the UK Marine Scheme (UKMS), the Netherlands Marine Scheme and the German Marine Scheme, and the German Onshore Scheme. The UKMS boundary extends landwards from the boundary of the UK Exclusive Economic Zone with the Netherlands to Mean High Water Springs (MHWS) in Essex, whilst the EOS extends to Mean Low Water Springs (MLWS). This approach ensures intertidal receptors and interactions are assessed.

There are two potential cable corridor routes into the Netherlands which are being considered, though the MMO understands that only one is required and the final selection will depend on ongoing discussions with UK consultees, stakeholders and Netherlands regulators.

The UKMS will have one bundle of up to two HVDC cables in two circuits, plus one fibre optic cable, running from the Transition Joint Bay (TJB) at the UK Landfall to the border between the UK and Netherlands waters. The total length of the UKMS cable corridor will be a maximum of 280 kilometres (km) and the cable voltage will be 525 kilovolts (kV). Cable installation will typically occur in sections of 100 - 200 km (depending on cable lay vessel capacity) but reducing to 30 km in shallower nearshore areas approaching the UK Landfall. The rate of installation is likely to be three to four kilometres per day.

The cable bundle will be installed within a single trench or surface laid (in case of post lay burial) and the trench will be 10 metres (m) in width. However, the MMO notes that a width of up to 60m and up to a depth of 8m of seabed disturbance may occur during cable installation if a trailing suction hopper dredger (TSHD) is the method used to install the cables. The MMO also notes that installation methods will depend on ground conditions and cable burial assessments, however, the following installation approaches are anticipated:

- Nearshore (<15m water depth): deep burial and shallow water installation methodologies such as Vertical Injector, Hydroplow or similar.
- Offshore: Simultaneous lay burial or pre-trenching and post lay burial. Methods will depend on factors such as sediment type, cable integrity and burial assessments.

The UKMS is expecting 80% burial, and 20% rock placements or other mitigations at cable crossings or where geology prevents burial. The burial depth of the cables will likely be up to 3m deep, with some areas deeper at up to 24m.

At the UK Landfall, the Subsea HVDC Cables will connect to the underground onshore HVDC cables via a buried TJB (typical dimensions for this TJB would be up to 40m long, 10m wide, 4m deep), with a 2m x 2m ground level access manhole. Cable landfall will be made using a trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD) or micro tunnelling, and potentially a degree of open trenching where necessary). It is currently expected that the techniques will involve installation of High-Density Polyethylene (HDPE) ducting through a trench (whether trenchless or open trench), through which the cable will be pulled; however, the MMO notes that this is to be confirmed following technical studies.

Works will be carried out over two separate years. Pre-installation activities will take approximately three months. Cable installation (lay and burial) of the UKMS is anticipated to take up to three years, with each year consisting of two to three months' work each summer. The cable lay will likely be performed on a 24-hour basis to reduce navigational impacts, optimise weather windows, and maximise vessel and equipment efficiency. Remedial work, such as the construction of rock berms is expected to take approximately two weeks following the installation of the cable. Remedial burial may take up to two months.

2 Location

The Tarchon Interconnector is located off of the East and South East coast of England from Essex to Niederlangen, Lower Saxony, Germany. Figure 1 shows the location of the Tarchon Interconnector within the UK Scheme which comprises of the EOS and UKMS. The UKMS boundary extends landwards from the boundary of the UK Exclusive Economic Zone with the Netherlands to Mean High Water Springs (MHWS) in Essex, whilst the EOS extends to MLWS.

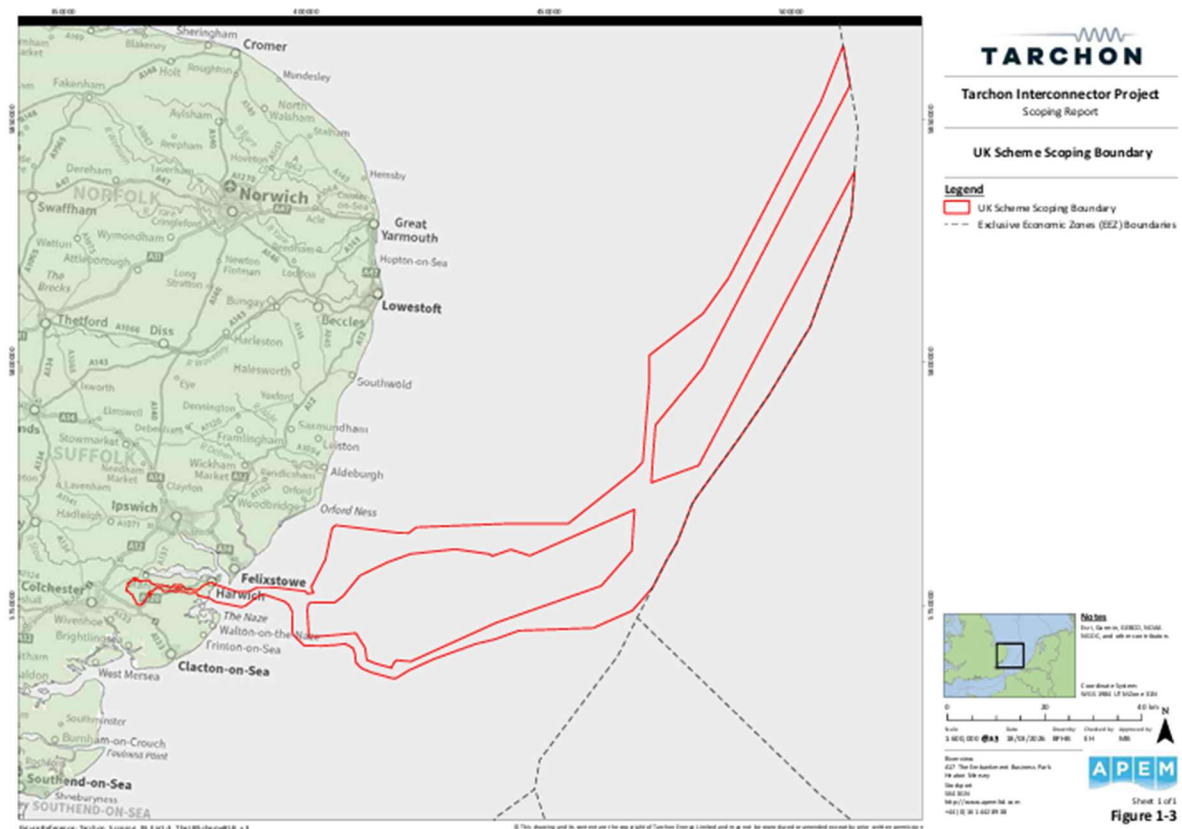


Figure 1: Scoping area of the Tarchon Interconnector Project within the UK Scheme.

3 Rochdale Envelope

- 3.1 The MMO requests for the full Rochdale envelope to be incorporated. The Applicant should apply the worst-case design parameters as part of the Rochdale Envelope. The MMO cannot accept approximates, therefore, the Applicant should remove reference to 'approximate' dimensions and replace with maximum parameters.

4 Scoping Opinion

Pursuant of regulations 10 and 11 of the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), Tarchon Energy Ltd have requested a Scoping Opinion from the MMO. In doing so, a Scoping Report entitled "EN0210009-000037-Tarchon - EIA Scoping Report - Part 1 - Volumes 1 to 5" and "EN0210009-000038-Tarchon - EIA Scoping Report - Part 2 - Volume 6 Annexes" has been submitted to the MMO for review. The MMO agrees with the topics outlined in the Scoping Report and in addition, we outline that the following aspects be considered further during the EIA and must be included in any resulting Environmental Statement.

4.1 General Comments

- 4.1 The Scoping Report is a high-level, well written and comprehensive document which has identified the relevant general impacts associated with the proposed project.

4.2 Marine Planning

- 4.2.1 The MMO notes and welcomes the Applicant's consideration of the South East inshore and offshore and East inshore and offshore marine plan areas within each relevant chapter of the Scoping Report.

4.3 Benthic Ecology

- 4.3.1 The MMO considers that the description of the benthic ecological characteristics within the study area is sufficient for this stage of the EIA process. A variety of desk-based sources has been utilised to understand the physical and biological characteristics. This understanding will, importantly, be further augmented through targeted survey work at a later stage within the EIA.
- 4.3.2 The MMO considers that the impacts that have been scoped in and out are appropriate and we agree with the decisions as they pertain to benthic ecological interests. However, the MMO notes that in Table 14-6, the potential impact of "*long-term habitat loss*" is currently only stated for the operational phase of the Project. It should be considered whether this also applies to the construction phase of the Project as this is this phase where the cable protection measures are implemented.

4.4 Coastal Processes

- 4.4.1 The MMO notes that Table 13-13 summarises what has been scoped into the assessment; these include changes in suspended sediment concentration (SSC), water quality, contaminants, morphology and coastal behaviour at landfall. Due to the nature and size of this project, the MMO would expect these to be scoped in.
- 4.4.2 When it comes to coastal morphology, the MMO considers that the impacts of changes in coastal morphology on the cable should also be scoped in, this is because landing sites for cable projects often see significant coastal change. Coastal change impacts such as coastal retreat or beach draw down which may impact proposed cable burial depth should be considered.
- 4.4.3 Scouring is scoped out of the project currently; with the reasoning that it will only have small and localised alterations to sediment transport patterns. The MMO agrees with this for the majority of the project area in deeper waters, however, cable protection measures and scour impacts could have larger impacts when close to landfall and links to point 4.4.2 above, where cable burial could become vulnerable with coastal change. The MMO understands the PEIR and associated cable burial risk assessments will go into further details on methods of protections, but if protection measures (such as rock placements) are to be considered near landfall or special areas of conservation, then scour should be considered alongside the cable protection impacts.

- 4.4.4 Table 13-1 outlines the data sources proposed for the Marine Physical study. Considering the large size of the project area which means that there will be a heavy reliance on desk-based study, there is a good range of data sources which the MMO agrees are appropriate. It is also stated that site specific geophysical surveys will be included within the EIA.
- 4.4.5 The report suggests that due to the high density of offshore infrastructure (such as Offshore Windfarms (OWFs)), that an assessment of the current evidence base should be sufficient rather than running any numerical modelling specifically for the project. The distribution of the OWF (or other infrastructure sources) within the survey area or the number of different studies in the area is not clear at this stage. This may be a suitable method, but the method of the previous modelling undertaken will need to be assessed to ensure it is usable for the project.

4.5 Fish Ecology and Commercial Fisheries

- 4.5.1 The MMO notes that all the key fish receptors and their susceptibility have been identified within the Scoping Report. This includes diadromous receptors noted as Atlantic salmon (*Salmo salar*), sea trout (*Salmo trutta*), European eel (*Anguilla anguilla*), twaite shad (*Alosa fallax*), allis shad (*Alosa alosa*), river lamprey (*Lampetra fluviatilis*), sea lamprey (*Petromyzon marinus*) and European smelt (*Osmerus eperlanus*).
- 4.5.2 Elasmobranchs which have been found to transit through the site, as well as those which use the site as a nursery and spawning ground have been listed. Nursery grounds of tope and thornback ray have been acknowledged within the project area. The MMO notes that although angel shark, white skate and Portuguese dogfish are listed as potential receptors, they are highly unlikely to be found within the Study Area.
- 4.5.3 Sand eel (*Ammodytidae spp.*) including great sand eel (*Hyperoplus lanceolatus*), small sand eel (*Ammodytes tobianus*), lesser sand eel (*Ammodytes marinus*) and smooth sand eel (*Gymnammodytes semisquamatus*), have been described separately as demersal spawners with spawning grounds within the Study Area. The MMO notes that Reach et al., (2024) heatmapping methodology has been used to identify areas of suitable spawning habitat for sand eel and produced figures displaying substrate suitability relative to the Study Area and a potential habitat heat map (Figures 15-8 and 15-9). Recent International Council for the Exploration of the Sea (ICES) advice for sand eel to maintain sustainable stock levels in the central and southern North Sea with avoidance of any activity leading to the degradation of sand eel habitat, has been acknowledged.
- 4.5.4 Herring (*Clupea harengus*) has been described separately due to its increased vulnerability to habitat disturbance as a demersal spawner. The importance of herring as a prey species for maintaining the Conservation Objectives for the Southern North Sea (SNS) Special Area of Conservation (SAC) has been

noted. ICES advice regarding the need for appropriate assessment of activities occurring in herring spawning habitats has also been recognised. The report has identified that the Study Area overlaps the spawning ground of the Downs herring population and has used a range of data to identify additional areas of 'marginal' and 'preferred' suitable spawning habitat within the Study Area. A preliminary 'heat' map has also been produced following the methodology by Kyle-Henney et al., (2024) to identify areas of potential herring spawning habitat in relation to the Study Area. The MMO has provided some comments (points 4.5.5-4.5.11 below) on the International Herring Larval Survey (IHLS) data used to inform the heat map which should be taken into account when downloading, using and interpreting the data, to ensure that any limitations are recognised and that the heat map outputs are interpreted correctly and adapted where appropriate.

- 4.5.5 In reference to the footnote on page 18 of 76 relating to Table 15-1: Key Sources of Fish and Shellfish Data: "*No (IHLS) survey data was collected within the Study Area during the 2017-18 and 2018-19 season*". Please note that this statement is incorrect. IHLS survey data for the Downs herring population were collected in the SNS between 2017 and 2019 as follows:
- Three SNS surveys in December 2016/January 2017 (see **Annex 1** and ICES 2017).
 - For the period 2017/2018, one survey was conducted in the SNS in December 2017, and one was conducted in January 2018 (see **Annex 1** and ICES 2018).
 - For the period 2018/2019, one survey was conducted in the second half of December 2018 (see **Annex 1** and ICES 2019).
- 4.5.6 The SNS and eastern English Channel IHLS surveys for the Downs herring population have been conducted as three separate sampling event surveys; one in the 3rd quarter of each year undertaken by the Netherlands between 16-31 December, and two in the 1st quarter of each year; between 1-15 January undertaken by Germany, and between 16-31 January undertaken by the Netherlands. However, the latter survey (16-31 January) was discontinued in 2017 (ICES, 2021) so the full temporal extent of spawning activity by the Downs herring stock is no longer fully reflected in SNS IHLS data collected post-2017. Spawning continues in this area, but the data no longer captures it. It should be noted that the area which is covered by the SNS IHLS survey has not changed and the spawning grounds in the English Channel and SNS are still covered in the same way as before.
- 4.5.7 The discontinuation of the third survey (16-31 January) affects how post-2017 IHLS data are integrated into the 'heat' mapping method, and how pre- and post-2017 IHLS data are presented alongside each other. As a result of this, the IHLS data used in the updated 'heat' mapping process (Kyle-Henney et al., 2024) is now separated into two layers; the IHLS General layer and the IHLS High Abundance layer.
- 4.5.8 The IHLS General layer presents data for every sampling station where larvae have been recorded for the years 2002 - present. This layer indicates the spatial extent of where herring larvae have been caught during the survey. There is no

abundance data associated with this layer, only presence/absence of larvae. The method used to categorise 0-ringer larvae presence/absence has not changed between pre- and post-2017 datasets, hence pre- and post-2017 data can be presented together in the IHLS General layer.

- 4.5.9 The IHLS High Abundance layers present a time series of larval abundance (no. of larvae/square metre (m²)) data to highlight areas of medium, high and very high spawning intensity. The High Abundance layers are presented alongside the heat map as indicative layers but do not contribute to the heat scoring. A minimum of ten years of data should be used. As per Kyle-Henney et al. (2024) the IHLS High Abundance layers should be overlaid onto the heat map.
- 4.5.10 When producing a heat map for the Downs herring spawning grounds (using Kyle-Henney et al., 2024), the IHLS High Abundance layers for the Downs stock should be presented as a pre-2017 larval abundance baseline using ten years of pre-2017 IHLS data (the years 2007-2017), and a post-2017 larval abundance using a minimum of ten years of post-2017 IHLS data (noting that data are currently only available up to 2025 at the time of writing).
- 4.5.11 The MMO recommends that the heatmap is presented as an interactive PDF file, so that the individual data layers can be interrogated. Alternatively, each of the mapped data layers can be presented as individual figures in the PEIR/ES.
- 4.5.12 The MMO agrees that the potential impacts to fisheries and fish ecology have been appropriately identified and scoped into the EIA assessment as follows;
- Increased suspended sediment concentrations and deposition of disturbed sediments.
 - Seabed disturbance.
 - Mortality, injury, behavioural impacts and auditory masking arising from Underwater Noise (UWN) and vibration.
 - Permanent and/or long-term habitat loss or alteration.
 - Colonisation of hard substrates.
 - Electromagnetic field emittance effects from cables.
- 4.5.13 Given the burrowing nature of sand eels and their vulnerability to habitat disturbance, the MMO recommends that sediment heating from cables during the operation stage is scoped into the EIA. It is understood that sand eel burrow to depths of between 20cm to 50cm for certain species in specific sediment types (Holland *et al.*, 2005; Rowley, 2008), so there is potential for sand eels to be exposed to the effects of thermal heating in the sediment layers they inhabit.
- 4.5.14 Increased risk of invasive non-native species introduction, accidental pollution and direct damage have been scoped out of the assessment due to the likelihood being reduced with standard protocols within the Construction Environmental Management Plan and OEMP, the MMO agrees this is appropriate.

- 4.5.15 Commercial fisheries have been identified, the majority within the Study Area are from the over 12 m fleet, however shallow inshore areas are noted for their importance to small-scale fishers such as ICES rectangle 32F1 which has the highest weight and value of fish landed of all the ICES rectangles within the Study Area. The four species with the highest landed value and weight from 2020 to 2024 within the total Study Area are squid followed by cockles, sole and whelks. The MMO considers that appropriate impacts have been scoped in, including displacement of fishing activity leading to increased conflict and pressure, additional steaming to further fishing grounds, temporary reduction in or access to established fishing grounds, increased vessel presence leading to interference with fishing grounds, increased snagging risk due to infrastructure, disturbance and/or displacement of commercial fish species, disturbance to seasonal fishing patterns, long term exclusion of fishing grounds for areas requiring cable protection and obstruction to navigational routes to fishing grounds. The MMO notes that a Fisheries Liaison Officer will be appointed, and further consultations will be held with commercial fisheries stakeholders during the PEIR development stage.
- 4.5.16 The MMO considers that the approach of the scoping assessment and data gathering is appropriate. The Scoping Report includes appropriate data from existing literature and relevant surveys to inform the report, these are listed in Table 15-1. Additional site-specific benthic surveys such as sediment grab samples and Drop-Down Video are proposed to further inform the assessment. Standardised approaches for assessing the potential impact pathways have been carried out using a significance matrix by combining the magnitude of impact with the sensitivity of the receptor informed by appropriate guidance e.g. Chartered Institute of Ecology and Environmental Management. The MMO agrees that these approaches are all appropriate. Please see points 4.5.5-4.5.11 for clarification on future herring heat maps production.
- 4.5.17 Potential cumulative and inter-related impacts will be detailed with the ES and PEIR reports. Cumulative effects will be assessed through a Cumulative Effect Assessment (CEA). The report states the impacts scoped into the assessment are generally spatially restricted to the UK Marine Scheme (UKMS) and have therefore scoped out impacts which do not have an effect on a designated species, site or feature. This results in only cumulative temporary increase in SSC and sediment deposition to be considered in the CEA.
- 4.5.18 The MMO encourages the consideration of cumulative impacts of underwater noise (UWN) and habitat disturbance and loss due to offshore wind farm developments and other future works, particularly in the inshore Study Area.

4.6 Shellfish

- 4.6.1 The MMO considers that the description of the environment and potential impacts is adequate. Some of the main impacts listed relevant to shellfish or species with demersal life stages include habitat loss, seabed disturbance and increased suspended sediments (SSCs), fisheries displacement of gear and Electromagnetic Fields. The significance of the effect will vary according to local factors such as the type and mobility of the species and seabed, the sensitivity

of the habitat and species' life stage.

- 4.6.2 Key commercial shellfish species identified in the region include: Whelk (*Buccinum undatum*), edible crab (*Cancer Pagurus*), European squid (*Loligo vulgaris*), veined squid (*Loligo forbesii*), native oyster (*Ostrea edulis*), blue mussel (*Mytilus edulis*), brown shrimp (*Crangon crangon*), common cockle (*Cerastoderma edule*), King scallop (*Pecten maximus*), lobster (*Homarus Gammarus*), clam species (*Tapes spp.*) and common cuttlefish (*Sepia officinalis*).
- 4.6.3 The MMO expects the Applicant to confirm with the local fisheries/Inshore Fisheries and Conservation Authority (IFCA) if Pacific oyster (*Crassostrea gigas*) is within the zone of influence and if yes, to include in the list of scoped in species.
- 4.6.4 Intertidal shellfish impacts could be different to offshore so for clarity the MMO recommends that these areas could be discussed separately. Inshore areas will include shellfish classification zones for blue mussel, common cockle, hard-shell clam, native oyster, Pacific oyster and Tapes clam species.
- 4.6.5 Information from ecological and marine surveys undertaken prior to cable construction can be used to avoid areas of significant importance where possible such as shellfish waters and protected areas and thus reducing potential impacts. The MMO considers that Eastern IFCA, Kent and Essex IFCA, fishers and local stakeholders should be consulted for up to date active fisheries information within the 6 nautical miles (nm) district.
- 4.6.6 The MMO considers that shellfish are appropriately identified as receptors and therefore scoped in at all phases from construction, operational and decommissioning. The proposed scope relevant to shellfish is outlined in the sections for Fish and shellfish, Commercial fisheries, Benthic ecologies, and Physical environment which is considered adequate. Shellfish Water Protected Areas are appropriately scoped in.
- 4.6.7 The MMO suggests that direct damage should be scoped In and not Out as is currently (Table 15-11). The justification given for Scoping Out was that "*Most fish and shellfish species (even the slowest swimming/moving) are likely to be mobile and can move away from direct damage (for example crushing) and disturbance and that this impact is scoped out of the EIA*". For shellfish species that are benthic, sedentary or attached to substrate, such as oyster, mussel and cockle, and where eggs may also attach to the substrate, such as with cuttlefish and squid then this would not hold true. Sedentary shellfish species should be described separately and scoped in separately to mobile fish.
- 4.6.8 The MMO considers that an initial desk-based and literature review approach to gather evidence from a range of published and other literature alongside vessel monitoring system (VMS), fishing activity and IFCA/stakeholder reporting is appropriate for an application of this nature. Publicly available data sets referenced include EMODnet, EUSeaMap broad-scale seabed and habitat mapping, EUNIS (European Nature Information System) habitat classifications,

MEDIN, One Benthic and British Geological Survey substrate classifications. Reference is given to key sources for Shellfish, Fisheries and Benthic and Intertidal Ecology data sources to include information from other offshore windfarm projects (OWF) such as North Falls OWF, East Anglia (1, 2 and 3), Norfolk Vanguard, Galloper and NeuConnect within the area.

4.6.9 The MMO would expect to see recent fisheries data included within the last ten years included within the literature review to develop a comprehensive and up-to-date commercial shellfish fisheries baseline for the area which is evidenced in the Commercial fisheries section of the report.

4.6.10 Section 17.5.1.13 notes that the datasets may not capture all commercial fisheries within the study area such as for >12m vessels. Fishing statistics for vessels under 12m in the UK are not as detailed as those for larger vessels. However, the MMO has produced a report (MMO, 2023) with further data for the under 12m vessel effort information and an interactive online mapping output. This provides further access to under 12m fishing activity data from sources such as inshore VMS and Automatic Identification Systems and could be included in the data sources.

4.6.11 Other data sources for the literature review could include Marine Aggregate Regional Environmental Assessment for the region. The MMO considers that this would be appropriate as there are several aggregate dredging areas within the Study Area (as referenced in 18.5.1.15). In addition, the Cefas crab and lobster stock assessments, whelk assessments and the relevant IFCA stock assessments and surveys can be used to inform shellfish fisheries sections within the ES. These additional sources, alongside up to date fisher information would be appropriate to evidence a shellfish baseline.

4.6.12 The MMO notes that Section 17.5.3.3. states consultation will be undertaken with both regulatory bodies and fisherman's organisations with guidance and input from the Project-appointed Fishery liaison officer (FLO).

The MMO considers it would be useful moving forward that documentation of information and issues raised to the FLO during the lifetime of the project are collated and reported on as part of the review and project reporting process so that actual project impacts are monitored and logged. This will allow projects moving forward a source of information to confirm if impacts were as predicted; usually minor or no significant impact.

4.6.13 The Scoping Report notes the data source for spawning grounds as the publications by Ellis et al. (2012) and Coull et al. (1998). These references do not include the spawning areas for commercially important shellfish species. Modest data exist relating to the existence of specific spawning grounds or spawning migrations for the majority of commercially exploited shellfish species in UK waters. However, locations of fished shellfish stocks can serve as a useful proxy for spawning grounds for the majority of shellfish species, particularly the more sedentary ones. Therefore, indicative spawning and nursery areas can be defined within the International Council for the Exploration of the Sea areas currently fished for shellfish and therefore included in the reporting.

4.6.14 The MMO considers that reporting should clearly keep shellfish in mind reflecting the percentage landings that these fisheries and species command in the region. There are some statements in the Fish and Shellfish chapter that are ‘fish-focused’ and not applicable to many sedentary shellfish so care should be taken to clearly consider the differences between the two and discuss each separately if the statements are not applicable to each other (example in paragraph 19). For example, mobile fish can move out of areas impacted by physical dredging damage etc, whilst sessile shellfish will not move quickly enough and will be subject to higher mortality.

4.7 Dredge and Disposal

4.7.1 With regards to dredge and disposal, the MMO agrees that the relevant impacts have been scoped in. The potential impacts from the temporary increases in SSCs, resulting in changes to seabed levels, deterioration of water quality due to the suspension of sediments and release of drilling fluids (such as bentonite) and release of sediment-bound contaminants from disturbance of sediments have been considered, which is appropriate.

4.7.2 The below potential impacts have been scoped out from further assessment, and the MMO considers the reasonings to be suitable.

- Accidental release or spills of materials/chemicals.
- Seabed scouring.

4.7.3 Section 13.8, paragraph 13.8.1.3, states that “*it is assumed that the dredged material associated with the usage of a TSHD will be deposited locally offshore (i.e. a suitable distance from the cable installation trench) and not transported to land or disposed of at a licensed disposal ground*”. Clarification should be provided at the next application stage on where this is to be deposited locally, the distance from the cable installation etc., as depending on the distances and area that is intended to be used for disposal, a disposal site may be required to be designated.

4.7.4 The MMO welcomes that “*site-specific sampling is being undertaken to further refine the understanding of contamination in the UKMS Scoping Boundary to inform the later stages of the EIA process*”. This is appropriate for this stage of the process.

4.8 Underwater Noise

4.8.1 In general, the relevant potential impacts associated with the construction, operational and decommissioning phases have been appropriately scoped in for marine mammal receptors, as set out in Table 16-8 in Chapter 16. From an underwater noise perspective, this includes the principal noise generating activities associated with the project, namely geophysical surveys, geotechnical sampling, trenching, cable protection and vessel operations, and the MMO agrees that these pathways should be taken forward for further assessment.

- 4.8.2 The adoption of a 3km Zone of Influence (ZOI) for marine mammals is noted to be based on the upper end of the Effective Deterrent Range (EDR) recommended by JNCC (2025) for Sub Bottom Profilers (SBP) and Ultra Sonic Baseline (USBL), reflecting remaining uncertainty and a precautionary approach (see paragraphs 16.2.2.2 – 16.2.2.3 in Chapter 16). However, it is not clear why an EDR derived specifically for SBP and USBL activities has been selected as the basis for the ZOI for all underwater noise generating activities scoped in for marine mammals. Clarification is therefore requested on the justification for applying this activity specific EDR more broadly, or whether activity specific ZOI will be considered and refined at the EIA stage, where appropriate.
- 4.8.3 Likewise, the potential effects of underwater noise arising from construction and decommissioning activities have been appropriately scoped in for fish and shellfish receptors (as set out in Table 15-11 in Chapter 15). However, potential effects associated with underwater noise during the operational phase have not been explicitly scoped in or scoped out for fish and shellfish receptors. Therefore, the MMO expects that such effects are either scoped in for assessment, or that clear justification is provided to support their exclusion.

Annex A22-2: Underwater Sound Assessment Methodology

- 4.8.4 Annex A22-2 sets out the relevant underwater noise considerations for the proposed UKMS and defines the proposed scope of assessment for noise and vibration producing activities associated with the construction, operational and decommissioning of the UKMS. Several noise generating activities have been identified, specifically cable laying, cable protection activities, and vessel operations – see Table A22-2-1 ‘Potential Underwater Sound Producing Activities’. Licensing for Unexploded Ordnance (UXO) works will be subject to a separate, standalone marine licence application.
- 4.8.5 Table A22-2-1 notes that construction vessels, cable-lay vessels and support vessels, including those operating in dynamic positioning (DP) mode, produce continuous, non-impulsive underwater noise at “*relatively low levels*”. This statement is vague and lacks context, as the basis for describing these noise levels as “relatively low” is not defined. In particular, vessels operating in DP mode can generate elevated underwater noise due to sustained thruster use, and sound levels may vary substantially depending on vessel type, operational mode and environmental conditions.
- 4.8.6 The MMO considers that the Annex appropriately acknowledges that underwater noise has the potential to result in a range of adverse effects on marine mammals and fish, including auditory injury, behavioural disturbance and masking. Paragraph 2.1.1.3 concludes that “*shellfish are considered more sensitive to particle motion rather than sound pressure; based on current understanding they are unlikely to experience adverse physiological or behavioural effects from the types of UWN expected from all phases of the UKMS*”. This conclusion that shellfish are unlikely to experience adverse physiological or behavioural effects is presented in a generic manner and is not

supported by clear justification. While shellfish are generally considered more sensitive to particle motion than sound pressure, many fish species are also primarily sensitive to particle motion. In addition, there is a growing body of evidence demonstrating behavioural and physiological responses to underwater noise in some invertebrate taxa. Notwithstanding the above, the Annex later states (Paragraph 2.5.2.7) that the assessment will draw on available evidence describing responses to low-frequency noise and seabed vibration. Documented behavioural and physiological responses will be used to assess the potential for disturbance. The MMO considers that this is appropriate and recommends drawing on the peer-reviewed literature to support assessment conclusions where appropriate.

- 4.8.7 Overall, the MMO considers that the proposed approach to the underwater noise assessment, adopting a qualitative, literature based methodology rather than undertaking site specific underwater sound modelling, is reasonable and proportionate given the nature of the activities proposed for the UKMS, which are limited to non-impulsive, continuous noise sources. For continuous, non-impulsive underwater noise sources, the primary pathway of potential concern is generally associated with cumulative sound exposure over time, rather than peak sound levels. The MMO considers that it is appropriate that the assessment will draw on relevant scientific literature and established guidance, including Southall et al. (2019), NMFS (2024), and Popper et al. (2014), to describe the likely relative magnitude of impacts and potential biological effects of underwater noise. It is proposed that the assessment will draw on established scientific evidence to consider the likely effects of non-impulsive, continuous noise sources on fish, shellfish and marine mammal species. It will be important that any information derived from the literature or from other projects (including source levels and proxy vessels) is clearly relevant and applicable to the specific activities proposed for this project.
- 4.8.8 The proposed approach to assessing potential behavioural disturbance in marine mammals may involve drawing upon EDRs where relevant (JNCC, 2020; JNCC, 2025). EDRs provide an estimate of the distance from a given sound source at which behavioural disturbance is likely to occur in harbour porpoise. Although EDRs are currently available only for harbour porpoise, this species is widely regarded as one of the most acoustically sensitive marine mammals in UK waters. As such, the MMO considers that the application of harbour porpoise EDRs offers a suitably precautionary approach when considering the potential for disturbance in other marine mammal species. However, it is noted that the current JNCC EDR guidance does not provide activity specific EDRs for non-impulsive, continuous noise sources such as cable lay operations or vessel activity. As such, EDRs may not be directly applicable to the proposed UKMS activities, and the assessment should be clear where disturbance is instead evaluated using a qualitative, evidence led approach based on published literature and documented behavioural responses.
- 4.8.9 Paragraph 2.5.3.12 lists the guidance that will be followed in the underwater sound assessments for the Marine Mammals chapter of the Environmental Statement. This includes the JNCC (2017) guidelines for minimising the risk of

injury to marine mammals from geophysical surveys. It is noted from the main Scoping Report (Volume 1, Section 2: UK Project Description) that, prior to cable installation, a full suite of geophysical and geotechnical surveys will be undertaken, and geophysical surveys are also referenced in Chapter 16 (Marine Mammal Ecology). However, geophysical surveys are not described or referenced within the scope of Annex 22-2, which focuses specifically on the proposed underwater noise assessment methodology. As such, there appears to be an inconsistency between the Annex and the main scoping chapters. Clarification is therefore required on whether geophysical surveys fall within the scope of the underwater noise assessment set out in Annex 22 2, and, if not, the circumstances under which the JNCC (2017) guidance would apply (for example, whether these activities will be assessed separately or considered under future or standalone marine licence applications).

4.8.10 As the project is at scoping stage, no detailed impact assessment has yet been undertaken. The report notes that there are currently no embedded mitigation measures specific to marine mammals. However, a series of control and management measures are proposed at this stage, reflecting standard regulatory practice and established best-practice guidance. In this context, support is noted for adherence, where applicable, to the JNCC (2017) Guidelines for minimising the risk of injury and disturbance to marine mammals from underwater sound generated by UKMS activities, including geophysical surveys, noting the need for clarity on the applicability of this guidance to the activities considered within the scope of Annex 22-2. Support is also noted for compliance with JNCC guidance for assessing the significance of noise disturbance in relation to the conservation objectives of the SNS SAC (JNCC, 2020). The proposed development of a Vessel Management Plan is supported as a relevant measure to manage and minimise underwater noise associated with vessel activities.

4.8.11 Based on the information available at this scoping stage, the MMO considers that the proposed control and management measures are considered appropriate to be taken forward, with their sufficiency and effectiveness to be confirmed and, where necessary, refined following completion of the detailed impact assessment at the EIA stage.

4.9 Nature Conservation

4.9.1 The MMO defers to Natural England and the Joint Nature Conservation Committee (JNCC) as the Statutory Nature Conservation Bodies (SNCBs) on the suitability of the scope of the assessment with regards to MPAs.

4.10 Marine Mammals

4.10.1 The MMO has provided comments on impacts on marine mammals from underwater noise above (see Section 4.8). The MMO defers to Natural England and JNCC as the SNCBs in relation to all other potential impacts to marine mammals.

4.11 Seascape / Landscape

4.11.1 The MMO defers to Historic England, the SNCBs and relevant local planning authorities on the suitability of the scope of the assessment with regards to Seascape and Landscape.

4.12 Marine Archaeology / Cultural Heritage

4.12.1 The MMO defers to Historic England on the suitability of the scope of the assessment with regards to archaeology and cultural heritage impacts.

4.13 Navigation / Other Users of the Sea

4.13.1 The MMO defers to the Maritime Coastguard Agency (MCA) and Trinity House on the suitability of the scope of the assessment with regards to navigation of vessels.

4.14 Water Quality

4.14.1 The MMO defers to the Environment Agency on the suitability of the scope of the assessment with regards to water quality.

4.15 Population and Human Health

4.15.1 The MMO defers to the Local Authority and UK Health Security Agency (UKHSA) on the suitability of the scope of the assessment with regards to population and human health impacts.

4.16 Cumulative Impacts & In-Combination Impacts

4.15.1 The MMO is content with the proposed approach for considering cumulative impacts and in-combination impacts.

5 Conclusion

The topics highlighted in this scoping opinion must be assessed during the EIA process and the outcome of these assessments **must** 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.

██████████
Marine Licensing Case Officer

D ██████████
E ██████████ [@marinemanagement.org.uk](mailto:██████████@marinemanagement.org.uk)



05 May 2026

6 References

Holland, G. J., Greenstreet, S. P., Gibb, I. M., Fraser, H. M., & Robertson, M. R. (2005). Identifying sandeel *Ammodytes marinus* sediment habitat preferences in the marine environment. *Marine Ecology Progress Series*, 303, 269-282.

ICES. 2017. Herring Assessment Working Group for the Area South of 62 deg N (HAWG), 14-22 March 2017, ICES HQ, Copenhagen, Denmark. ICES CM 2017/ACOM:07. 856 pp. <https://doi.org/10.17895/ices.pub.5434>

ICES. 2018. Report of the Herring Assessment Working Group for the Area South of 62°N (HAWG). 29-31 January 2018 and 12-20 March 2018. ICES HQ, Copenhagen, Denmark. ICES CM 2018/ACOM:07. 960 pp. <https://doi.org/10.17895/ices.pub.5307>

ICES. 2019. Herring Assessment Working Group for the Area South of 62° N (HAWG). ICES Scientific Reports. 1:2. 971 pp. <http://doi.org/10.17895/ices.pub.5460>

ICES. 2021. Herring Assessment Working Group for the area South of 62° N (HAWG). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.8214>

Joint Nature Conservation Committee (JNCC) (2020). *Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise Special Areas of Conservation (England, Wales & Northern Ireland)*. JNCC Report No. 654. JNCC, Peterborough. ISSN 0963-8091. <https://jncc.gov.uk/resources/53dca892-8da4-4f9a-9f1b-407367b142d4>.

Joint Nature Conservation Committee (JNCC) (2025). *Updated Effective Deterrent Ranges (EDRs) for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise Special Areas of Conservation (England, Wales & Northern Ireland)*. JNCC Report No. 803. JNCC, Peterborough. ISSN 0963-8091. <https://jncc.gov.uk/resources/5376c9a1-5d88-4291-aab4-028d5b4a1acd>.

Kyle-Henney M, Reach I, Barr N, Warner I, Lowe S, and Lloyd Jones D, 2024. Identifying and Mapping Atlantic Herring Potential Spawning Habitat: An Updated Method Statement.

MMO (2023). *Mapping of under 12m vessel fishing effort. A report produced for the Defra IEG, MMO Project No: 1246, April 2023, 43pp* [MMO1264_U12m_Fishing.pdf](https://assets.publishing.service.gov.uk/media/647a18af126830011ca675a/MMO1264_U12m_Fishing.pdf) https://assets.publishing.service.gov.uk/media/647a18af126830011ca675a/MMO1264_U12m_Fishing.pdf

National Marine Fisheries Service (NMFS) (2024). *2024 Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0): Underwater and In-Air Criteria for Onset of Auditory Injury and Temporary Threshold Shifts*. NOAA Technical Memorandum NMFS-OPR-71. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Silver Spring, MD. https://www.fisheries.noaa.gov/s3/2024-11/Tech_Memo-Guidance_-3.0-OCT-2024-508_OPR1.pdf.

Popper, A.N., Hawkins, A.D., Fay, R.R., Mann, D.A., Bartol, S., Carlson, T.J., Coombs, S., Ellison, W.T., Gentry, R.L., Halvorsen, M.B., Løkkeborg, S., Rogers, P.H., Southall, B.L., Zeddis, D.G. and Tavalga, W.N. (2014). *Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report prepared by ANSI-Accredited Standards Committee S3/SC1 and registered with ANSI*. ASA S3/SC1.4 TR-2014. Springer, Cham. <https://doi.org/10.1007/978-3-319-06659-2>.

Reach I, Kyle-Henney M, Barr N, Warner I, Lowe S, and Lloyd Jones D, 2024. Identifying and Mapping Sandeel Potential Supporting Habitat: An Updated Method Statement.

Rowley, S.J. 2008. *Ammodytes tobianus* Lesser sand eel. In Tyler-Walters H. and Hiscock K. *Marine Life Information Network: Biology and Sensitivity Key Information Reviews*, [on-line]. Plymouth: Marine Biological Association of the United Kingdom. [cited 24-11-2023]. Available from: <https://www.marlin.ac.uk/species/detail/2067>

Southall, B.L., Finneran, J.J., Reichmuth, C., Nachtigall, P.E., Ketten, D.R., Bowles, A.E., Ellison, W.T., Nowacek, D.P. and Tyack, P.L. (2019). *Marine Mammal Noise Exposure Criteria: Updated Scientific Recommendations for Residual Hearing Effects. Aquatic Mammals*, 45(2), pp. 125–232. <https://doi.org/10.1578/AM.45.2.2019.125>

7 Annex 1

ICES bubble plots for abundance of larvae for survey years 2016/2017, 2017/2018 and 2018/2019.

From: ICES, 2017.

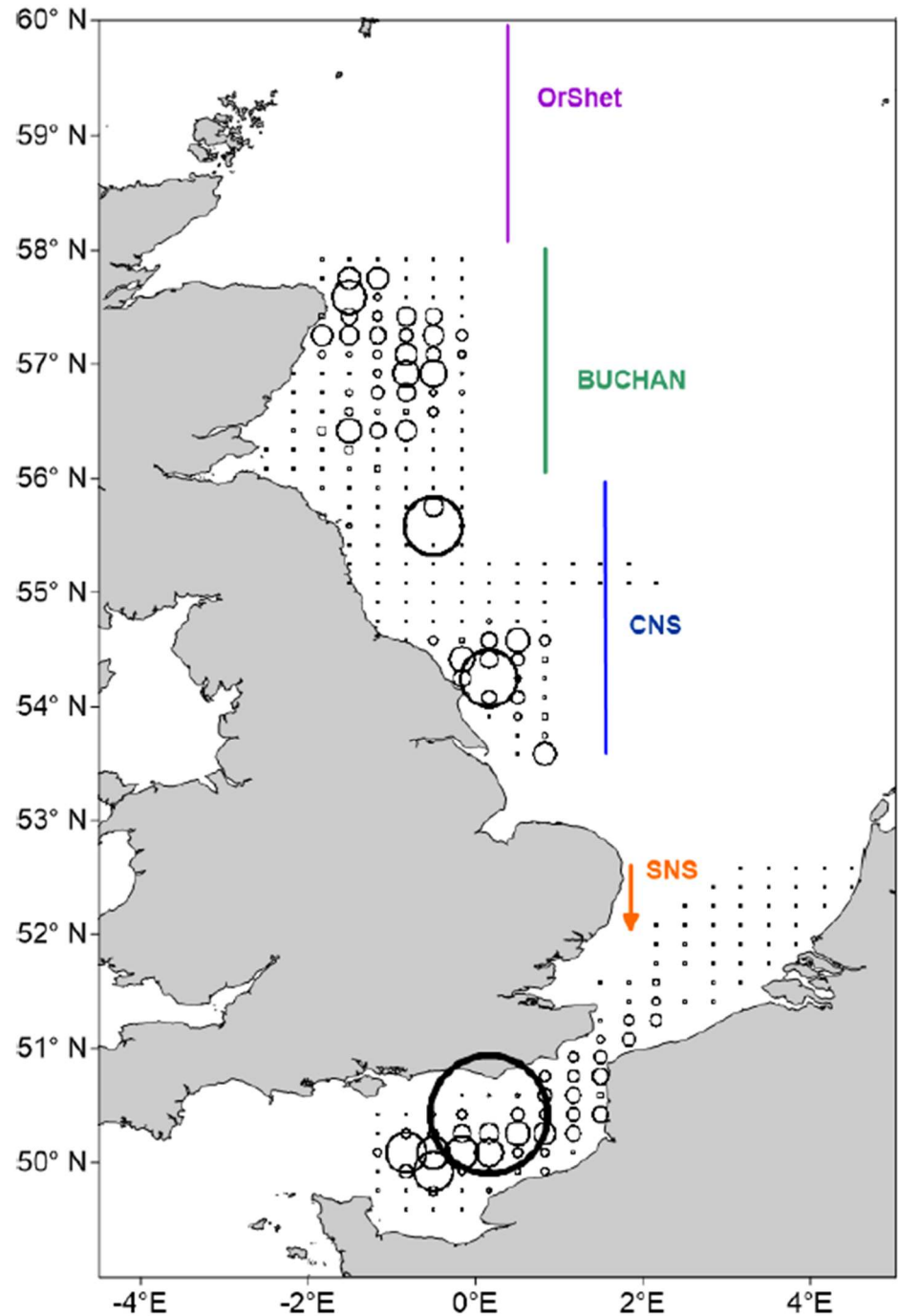


Figure 3.3.2.1: North Sea herring - Abundance of larvae < 10 mm (n/m^2) in the Buchan, Central and Southern North Sea as obtained from the International Herring Larvae Surveys in autumn and winter 2016 / 2017 (maximum circle size = 20 000 n/m^2). The survey around the Orkneys was cancelled due to technical problem of the research vessel. The abundance in the Southern North Sea is given as the mean of the three surveys done in December 2016 and January 2017.

From: ICES, 2018.

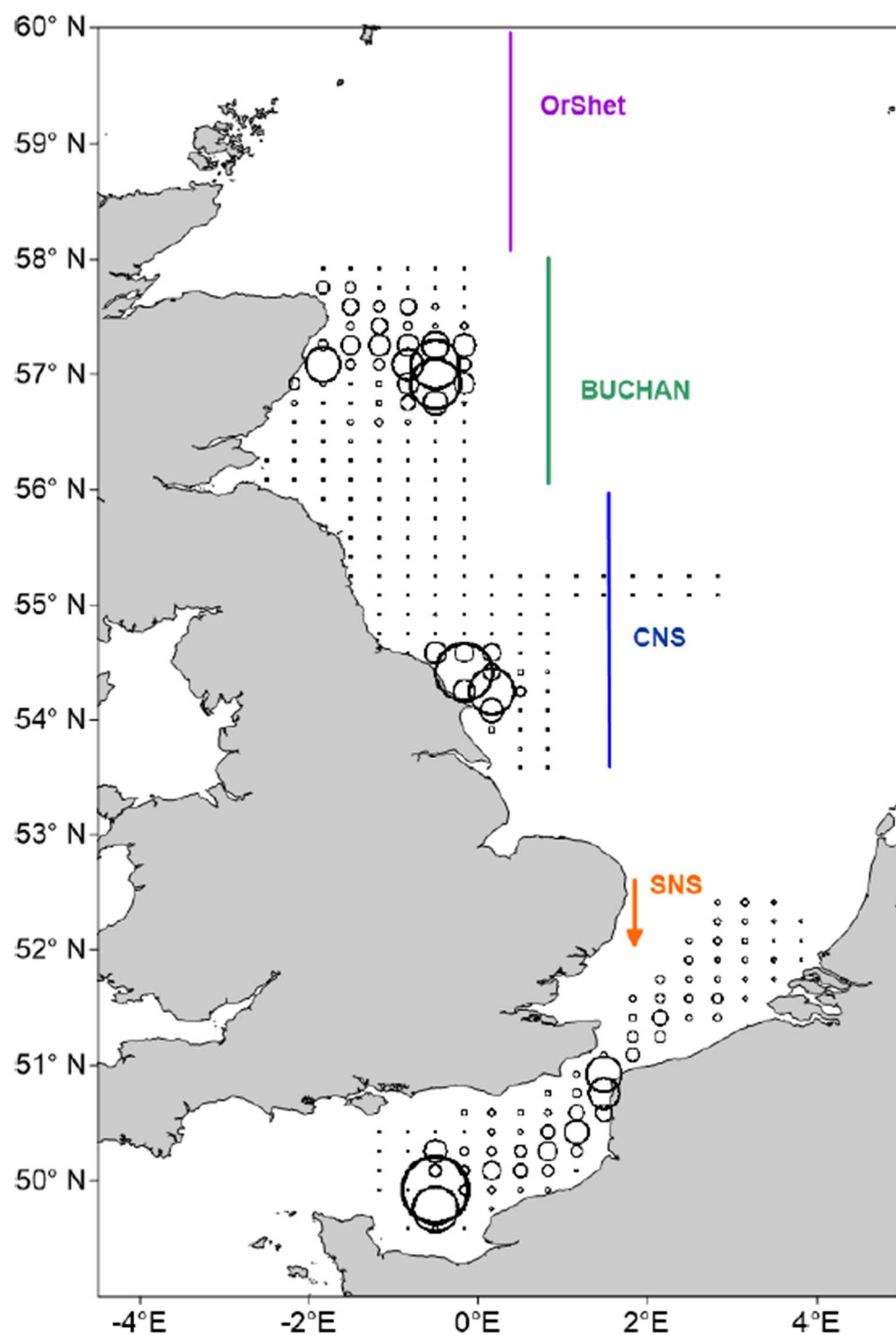


Figure 2.3.2.1: North Sea herring - Abundance of larvae < 10 mm (n/m^2) in the Buchan, Central and Southern North Sea as obtained from the International Herring Larvae Surveys in autumn and winter 2017 / 2018 (maximum circle size = 5 850 n/m^2). The survey around the Orkneys was cancelled due to technical problem of the research vessel. The abundance in the Southern North Sea is given as the mean of the two surveys done in December 2017 and January 2018.

From: ICES, 2019.

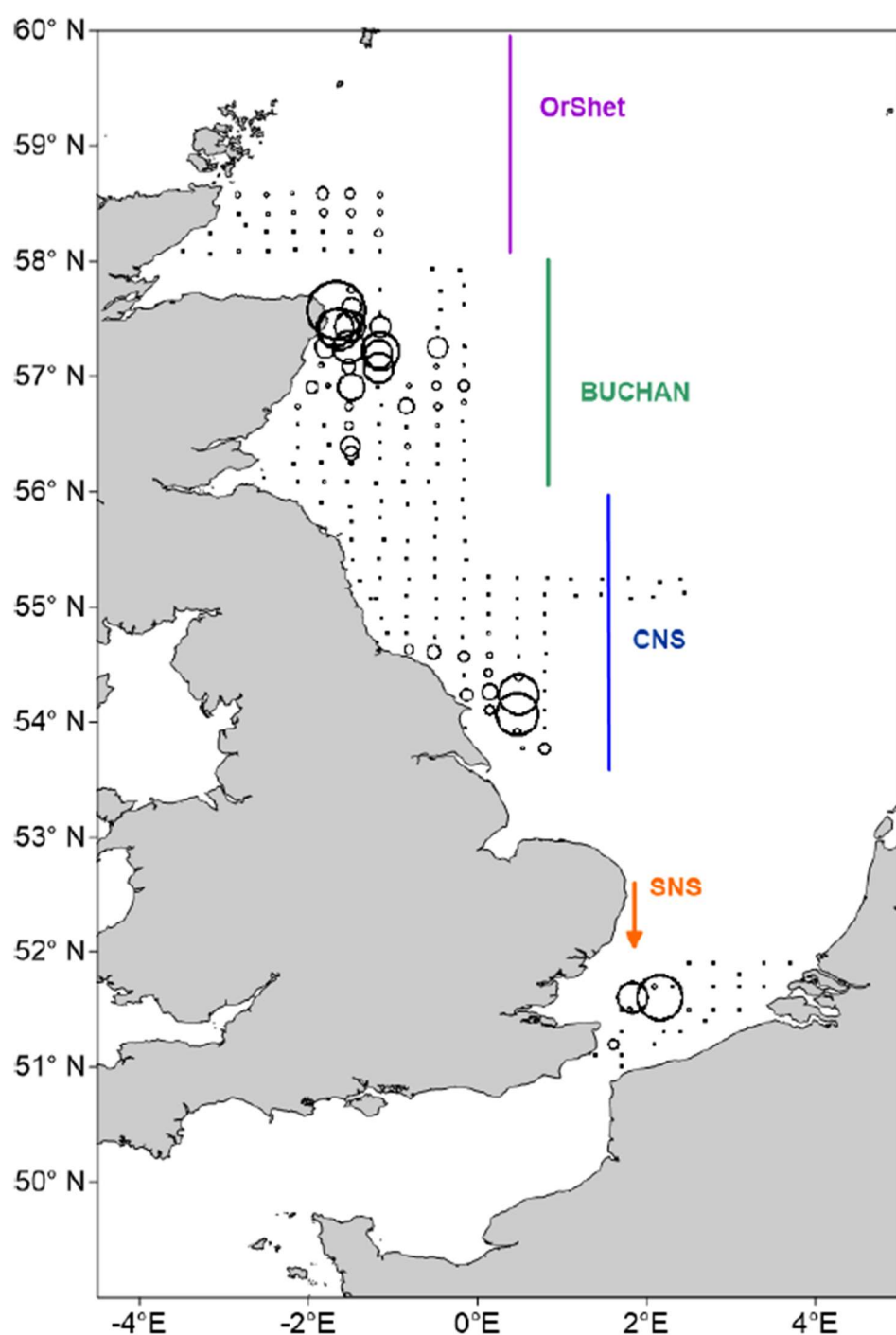


Figure 2.3.2.1: North Sea herring - Abundance of larvae < 10 mm (n/m²) in the Buchan, Central and Southern North Sea as obtained from the International Herring Larvae Surveys in autumn and winter 2018/2019 (maximum circle size = 3500 n/m²). The survey around the Orkneys had to be stopped after 28 hauls due to technical problems of the research vessel.



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency

Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

06 May 2026

Via email: tarchoninterconnector@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 Tarchon Interconnector Limited (the Applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for consulting the Maritime and Coastguard Agency (MCA) on the Environmental Impact Assessment (EIA) Scoping Report for the proposed Tarchon Interconnector Project UK Scheme. The Scoping Report has been considered by representatives of Marine Safety and PNT Services, and the MCA would like to respond as follows.

We note that the UK Marine Scheme (UKMS) would comprise the following principal elements:

- Up to two HVDC subsea cables (plus fibre optic cable) running from a landfall on the Essex coast, south of Harwich and north of Hamford Water, through UK waters to the UK–Netherlands median line, with a total offshore length of approximately 22 km within UK waters.
- Cable landfall via trenchless crossing techniques (e.g. Horizontal Directional Drilling or micro-tunnelling) at a location on the Essex coast in the vicinity of Little Oakley.
- An English Onshore Scheme (EOS) comprising underground HVDC and HVAC cables connecting the landfall to a new Converter Station in Essex, and onward connection to the National Grid East Anglia Connection Node (EACN) Substation.
- A new Converter Station in Essex to convert electricity between HVDC and HVAC for interface with the onshore transmission system.
- The overall Tarchon Project forms a high-capacity electricity interconnector of up to 1.8 GW linking Essex, UK, and Niederlangen, Lower Saxony, Germany, with a total cable length of approximately 800 km.

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas, and any impact on our search and rescue obligations. The MCA is the National Competent Authority for the SUNK Vessel Traffic Services (VTS) appointed by the Department for Transport (DfT) under SOLAS Chapter V - Regulation 12 and His Majesty's Coastguard (HMCG) has responsibility for the day-to-day operation

of Sunk VTS. Any matters regarding the Sunk VTS should be discussed with our colleagues within HM Coastguard. Our combined comments to date are set out below:

- 1) The MCA would expect any works in the marine environment to be subject to the appropriate marine licensing and planning consents before carrying out any marine licensable works. We note that the project will fall under the Marine and Coastal Access Act 2009, and will cover all installation, commissioning, operational, maintenance and decommissioning activities of the project.
- 2) The development area carries a significant volume of through traffic to major ports including Harwich, Felixstowe, Ipswich, Mistley and ports in the Thames Estuary. Important international shipping routes and IMO routeing measures are present within the Study Area, including the Sunk Traffic Separation Scheme (TSS), the Sunk Inner and Outer Precautionary Areas, and several Deep-Water Routes (DWRs) serving these ports. The MCA notes that two route options are under consideration – the “northern” and “central” corridor options – and that the central option crosses the Sunk Inner Anchorage and Sunk Precautionary Areas, as well as passing directly adjacent to DWRs leading to Thames Estuary ports. The works must not encroach on to the SUNK Inner anchorage as it is a recognised critical anchorage area for vessels passing through the SUNK. Attention must be paid to changes in vessel routing, especially for deep-draught commercial vessels, ensuring that shipping can continue to make safe passage without large-scale deviations, and that any reduction in navigable depth referenced to Chart Datum is carefully managed.
- 3) We welcome the commitment to undertake a Navigation Risk Assessment (NRA) in accordance with the IMO Formal Safety Assessment (FSA) methodology, as referenced in the Scoping Report. The NRA should establish how the phases of the project are managed to a point where risk is reduced and considered to be ‘as low as reasonably practicable’ (ALARP). We would highly recommend that nautical charts be used in the NRA to provide the reassurance, clarity and contextual understanding of the navigational environment. The MCA would also expect a marine hazard identification workshop to be carried out as part of the NRA, engaging with all relevant navigational stakeholders, and we welcome the consultation undertaken so far with navigational stakeholders. We note the initial meetings held with the MCA in February and November 2025 and look forward to continued engagement, including participation in the planned HAZID workshop.
- 4) A range of potential project impacts on shipping and navigation have been identified and scoped into the assessment, covering the construction, operational and decommissioning phases. The MCA welcomes the comprehensive approach to scoping presented in Volume 03, Chapter 18. The MCA notes that electromagnetic interference with marine navigational equipment has been scoped out during the pre-energisation construction phase and post-decommissioning, which is considered appropriate.
- 5) The MCA notes that the Shipping and Navigation chapter of the Environmental Statement will consider the potential impacts of the construction, operation, maintenance, and decommissioning phases of the project using the IMO FSA approach and terminology, with the NRA serving as the technical appendix to the ES chapter. The MCA would expect the Environmental Statement to detail the possible impact on navigational issues for both commercial and recreational craft, specifically:
 - Collision risk,
 - Navigational safety,
 - Risk management and emergency response,
 - Effect on small craft navigational and communication equipment,

- The likely squeeze of small craft into the routes of larger commercial vessels.
 - Marking and lighting of the construction site and provision of information to mariners,
 - Disruption of access to ports and harbours, including those on the Rivers Stour and Orwell, and proximity of works to pilot boarding stations.
- 6) The MCA notes the potential for a reduction of under keel clearance (UKC) due to the laid cables, associated protection measures and displaced sediment, which has been appropriately scoped into the assessment for all project phases. We draw the Applicant's attention to the MCA's Under Keel Clearance Policy paper. We would prefer a similar methodology to be used for UKC calculations; however, noting that this paper is originally intended for subsurface energy devices a proportional approach could be sufficient for a subsea cable. The link to this paper is provided here:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/373456/Under_Keel_Clearance_paper_May_14_-_FINAL.pdf
 A safe and realistic UKC assessment should be undertaken for the maximum draughts of vessels both observed and anticipated. This is of particular importance given the presence of vessels with draughts up to 20.9 m transiting Deep-Water Route (DWR's) within the Study Area, such as the IMO adopted DWR forming parts of the Routeing System "Off Friesland", as identified in the AIS baseline data. Specific consideration should be given to water depths at the Harwich Deep-Water Channel, the "South West Shipwash" and the Sunk and Trinity DWRs, where the UKMS Scoping Boundary approaches or intersects these features.
- 7) Attention should be paid to cable routing and burial depth. A Cable Burial Risk Assessment (CBRA) must be completed before installation, identifying areas where target burial may not be achievable. Where cable protection measures are required or at cable crossings, the MCA would usually accept up to a 5% reduction in surrounding depths referenced to Chart Datum, however the 5% is a trigger point for further discussion. Any reduction in an area with minimal vessel clearance should be discussed further with the MCA, as well as in area where deep-draught vessels operate. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA and secured through consent conditions. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met.
- 8) This will also be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase. Where this is not achievable, the undertaker must discuss further with the MCA and Trinity House. An anchor penetration study may also be necessary, subject to traffic volumes, given the presence of charted anchorages within and adjacent to the UKMS Scoping Boundary, including the Sunk Inner Anchorage.
- 9) A study should be undertaken to establish the electromagnetic deviation, affecting ship compasses and other navigating systems, of the high voltage cable route to the satisfaction of the MCA. The MCA notes the Applicant's stated intention to minimise compass deviation effects through cable design and burial. On receipt of the study, the MCA reserves the right to request a deviation survey of the cable route post-installation.
- 10) The MCA welcomes the commitment to provide a Vessel Management Plan (VMP) as embedded mitigation. The VMP should set out in detail the types and numbers of project vessels, indicative transit routes, coordination measures with the Sunk Vessel Traffic Service (VTS) and Harwich Haven Authority (HHA) Harbour Control, and concurrent working procedures. There will likely be areas where safeguarding navigable depth is a

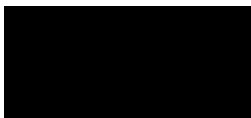
key risk mitigation measure, where we would aim for adequate burial and no depth reduction, including any potential anchor interaction with associated protection measures.

- 11) The MCA notes the complex navigational environment in the area and the potential for simultaneous operations (SIMOP) with other cable and offshore wind farm projects. The VMP should specifically address how works in the vicinity of the Sunk TSS, DWRs and port access channels will be managed, and how project vessels Restricted in their Ability to Manoeuvre (RAM) will coordinate safe passing distances with third-party vessels. Liaison with other marine developers should be made early to de-conflict potential SIMOP areas in confined waterways in and around the SUNK area.
- 12) The MCA notes the commitment to assess potential cumulative effects associated with the UKMS in combination with other nearby offshore developments, including planned and consented offshore wind farms such as Five Estuaries, North Falls, Norfolk Vanguard, Norfolk Boreas and East Anglia One North, and other subsea cable projects, including NeuConnect (under construction) and Sea Link (currently in DCO Examination). Given the number of concurrent developments within this busy navigational area, the MCA considers a thorough cumulative assessment to be particularly important and would expect the FSA process to assess the cumulative change in overall risk ranking for shipping and navigation. Furthermore, the MCA would recommend that the applicant considers the shipping and navigation-related elements of the recent Sea Link Examination process through the Planning Inspectorate to explore the key issues for de-risking operations in the SUNK Area, as raised by the MCA and relevant local ports.
- 13) The MCA would expect no activities involving vessels Restricted in Ability to Manoeuvre (RAM) to run concurrently with activities involving RAM vessels planned by other projects in the SUNK area. No project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey, etc.) are to operate in the wider Sunk area when visibility is below nautical 2 miles. This area of interest should be discussed further with the MCA.
- 14) The MCA would expect no effects to be scoped out of the shipping and navigation assessment before the completion of the NRA and further stakeholder engagement, except where a robust justification has been provided. We note the proposed scoping out of electromagnetic interference with marine navigational equipment during construction (prior to energisation) and following decommissioning (after de-energisation), which the MCA considers justified.

Finally, we would expect emergency response arrangements to be considered as part of this project on the potential impacts to search and rescue (SAR) and emergency response in the area, to ensure there are no impacts on SAR operations. The MCA notes the provision of a Marine Emergency Action Card (MEAC) as embedded mitigation and considers this a positive step.

I hope you find this information useful at the Scoping Stage. The MCA looks forward to continued engagement with the Applicant and to participation in the planned hazard identification workshop as the assessment progresses.

Yours faithfully,



Marine Licensing and Offshore Consenting Lead
Marine Safety and PNT Services



Defence
Infrastructure
Organisation

Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
Whittington
Lichfield
Staffordshire
WS14 9PY

Mobile: [REDACTED]
E-mail: [REDACTED]@mod.gov.uk

DIO ref: 10070597

The Planning Inspectorate
By Email Only

5 May 2026

Dear [REDACTED]

Proposal: Scoping Opinion for the Tarchon Interconnector from Essex to Germany.

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion which was received by this office on the 08th April 2026

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (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, and technical sites or training resources such as the Military Low Flying System.

Tarchon Energy Limited submitted an Environmental Impact Assessment Scoping Report (the Scoping Report) in relation to the construction, operation and decommissioning phases for both the onshore and offshore elements of the proposed development which fall within the UK Scheme Scoping Boundary.

At this stage because details of the development and supporting infrastructure are not fully available, and only a route scoping plan is available for the proposed development, only an initial assessment has been completed, and we can provide the following onshore and offshore MOD safeguarding advice.

Onshore Development

The applicant is seeking a scoping opinion for the construction of onshore HVDC and HVAC cables, a Converter Station and grid connection works to National Grids West Anglia Connection Node. Elements of this proposed development fall within the MoD's statutory technical safeguarding zones surrounding the East Wam Network.

Technical

Technical safeguarding zones define areas surrounding radars, radio transmitter/ receiver sites and other types of technical installations supporting operational defence or national security requirements within which the heights of development, materials used in construction and introduction of sources of electro-magnetic fields are regulated.

Wide Area Multilateration (WAM) is a network of masts and microwave links which provide secondary surveillance coverage over an area. Based upon the information provided, part of the scoping boundary for the proposed onshore cable route and associated infrastructure corridor occupies the technical safeguarding zone in place to protect the East WAM Network. In this area the MoD must be consulted on any development or change of land use. There is the potential that the operation, construction and decommissioning phases of the proposed cable route and associated infrastructure may impact upon the effective operation of this safeguarded technical asset.

It will be necessary for the MoD to be consulted on any development or change of land use within the statutory East WAM Network technical safeguarding zone to ensure the cable routing and associated infrastructure is compatible with MoD's safeguarding requirements. We note the statement in document titled EIA Part 1 English Onshore Scheme (EOS) HVDC and HVAC Cabling Design Options in which the applicant outlines their reasoning for sunken ground cables, it is important the Ministry of Defence is consulted on any development or change of land use within the statutory East WAM Network safeguarding zone to ensure cable routing and associated infrastructure is compatible with safeguarding requirements. The applicant should therefore scope in the safeguarding of the MOD's East WAM Network safeguarding zone into their EIA.

We welcome early engagement with the applicant and would request that the MoD is informed as details of the cable route and associated infrastructure are confirmed. In addition, the MoD will need to be informed in advance of the use of any cranes, tall construction equipment or temporal structures to be used during the construction of this development, to ensure the safeguarding of the East WAM Network is not adversely affected.

Offshore Development

The applicant is seeking a scoping opinion for the construction of the Tarchon Interconnector (the project) which comprises a new subsea HVDC and HVAC electricity cable known as an interconnector between England and Germany, as identified by the applicants GIS data.

The MoD maintains safeguarding to the outer limits of the United Kingdom's Continental Shelf Area (UKCS Area). Defence maritime assets within the UKCS are specific areas designated to support certain defence functions or actual items of infrastructure located in the maritime environment that have an operational function of importance for maintaining national defence requirements.

The offshore cable corridor passes beneath Low Flying Areas 10 and 5 of the of the UK Military Low Flying System in which military aircraft may engage in low level flying activities. The offshore cable corridor also passes through Military Practice and Exercise Areas (PEXA) X5118 and X5121. Furthermore, there are other defence interests in the locality relating to maritime navigational interests and installations that are not defined in the public domain.

It is not expected that an interconnector cable installed along the cable corridor identified will impact upon defence interests or capability, however, the MOD will be able to provide specific advice on the proposed cable installation, when more detailed information becomes available.

In conclusion, at this scoping application stage, where no details are available for the designs or maximum heights of the onshore and offshore development's, MoD representations are limited to the principle of the development only. In summary, the MoD requires the applicant to scope in potential impacts of the development on the East WAM network; Low Flying Areas 5 and 10; and PEXA areas X5118 and X5121.

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 titled Environmental Impact Assessment Scoping Report dated 8th April 2026. 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. In the event that 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

Yours sincerely


Safeguarding Manager
DIO Safeguarding

██████████
Lead Development Liaison Officer
██████████@nationalgrid.com
██████████

██████████
Development Liaison Support Officer
██████████@nationalgrid.com
██████████

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
tarchoninterconnector@planninginspectorate.gov.uk

05 May 2026

Dear Sir/Madam

RE: APPLICATION BY Tarchon Energy Limited (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Tarchon Interconnector Project (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 29th March 2026 regarding the above Proposed Development.

This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

NGET has no existing apparatus within or in close proximity to the proposed site boundary but would like to pass comment on new infrastructure that NGET is proposing.

We enclose a plan showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

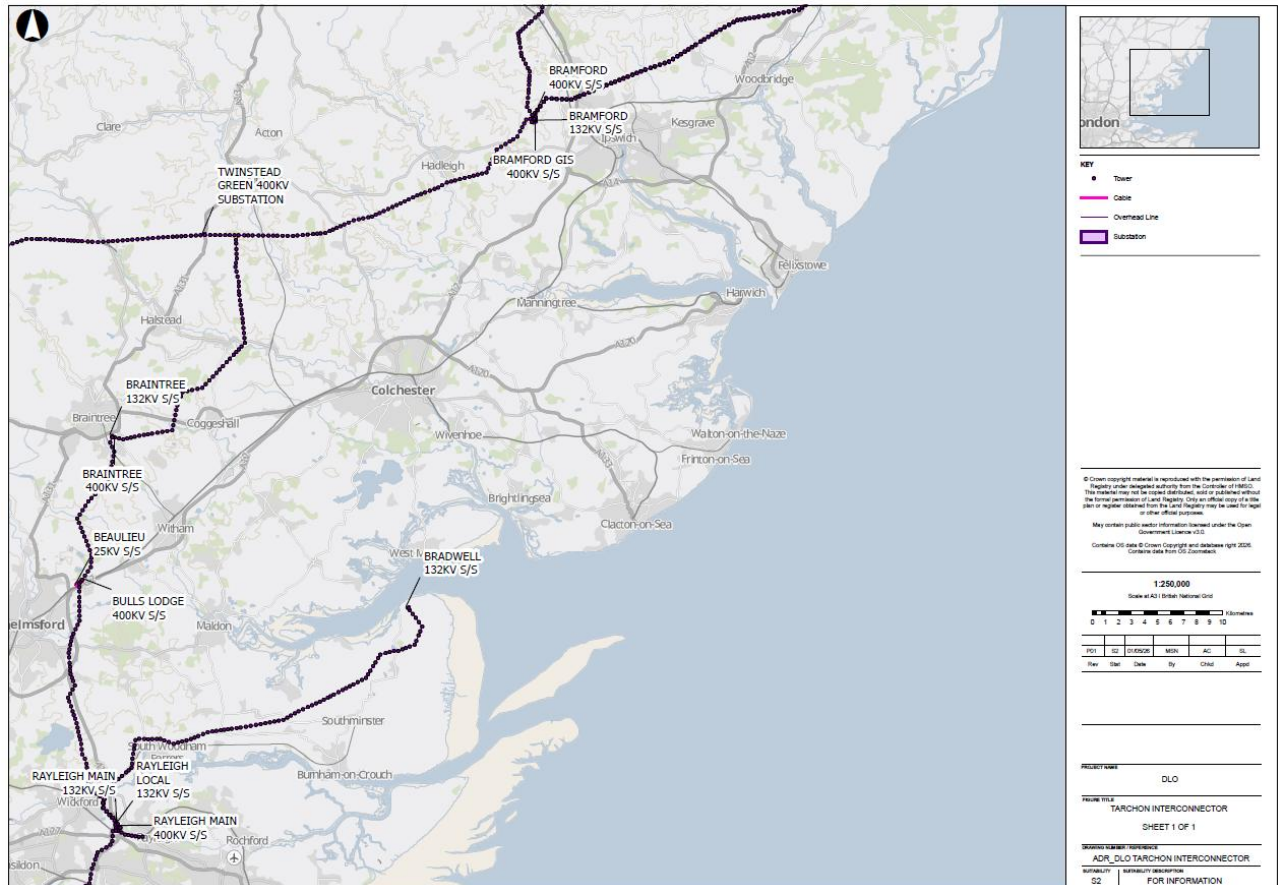


Figure 1: NGET Assets in proposed development area

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

Onshore Infrastructure

Norwich to Tilbury

National Grid welcomes the opportunity to input to the Scoping Opinion for the Tarchon Interconnector Project [EN0210009]. National Grid is contracted to connect the Tarchon Interconnector by 2030 as part of its Norwich to Tilbury Project. The converter station for the Tarchon Interconnector will connect to the Project's East Anglian Connection Node (EACN) substation, via underground cabling. Subject to both projects being consented, there will be an overlap during the construction and operation. This interaction needs to be captured within the cumulative assessment contained within the Tarchon Energy Ltd Environmental Assessment.

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 the high-voltage transmission of electricity 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.

The following points should be taken into consideration.

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 worst 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.

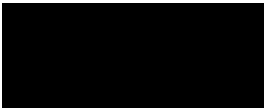
Further Advice

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

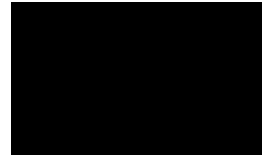
We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Technical Guidance Note 287

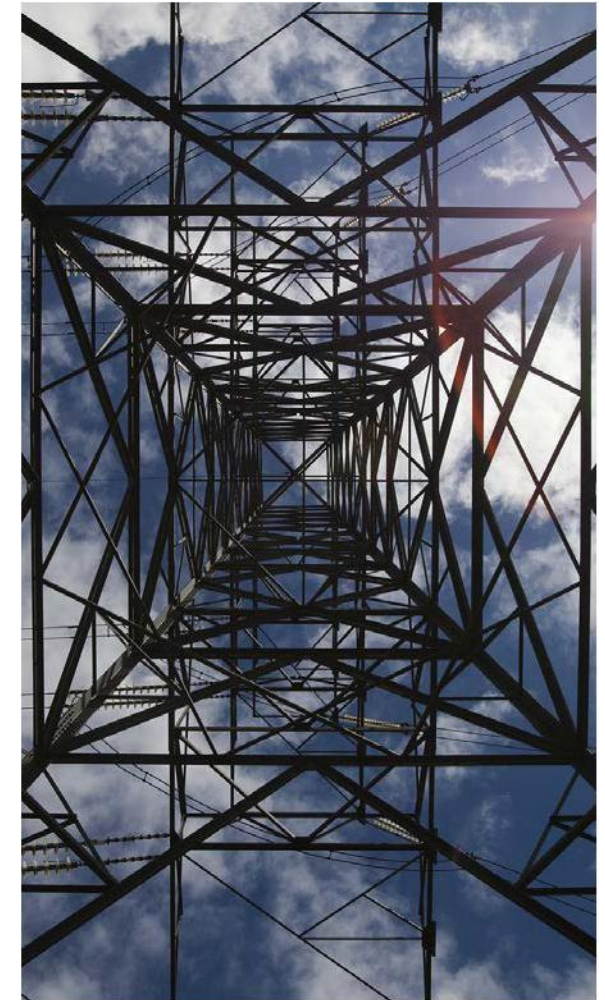
Third-party guidance for working near National Grid Electricity Transmission equipment

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
Plant protection.....	3	Electrical clearance from overhead lines.....	7
Emergencies.....	3	Underground cables.....	8
 Part 1 – Electricity Transmission		Impressed voltage	8
infrastructure	4	Earth potential rise.....	9
Overhead lines.....	4	Noise	9
Underground cables.....	4	Maintenance access	9
Substations	4	Fires and firefighting.....	10
 Part 2 – Statutory requirements for		Excavations, piling or tunnelling	10
working near high-voltage electricity	4	Microshocks.....	10
Electrical safety clearances	4	Specific development guidance	11
Your Responsibilities – Overhead Lines.....	5	Wind farms	11
 Part 3 – What National Grid will do for		Commercial and housing developments	11
you and your development	6	Solar farms.....	12
Provision of information	6	Asset protection agreements	13
Drawings.....	6	Contact details	13
		Emergency situations	13
		Routine enquiries	13
		Appendix A OHL Profile Drawing Guide	14
		Appendix B OHL Tower Stand Off &	
		Reconductoring Area	15



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.

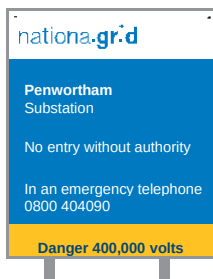
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

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.



« [Section continued from previous page](#)

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.

.

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

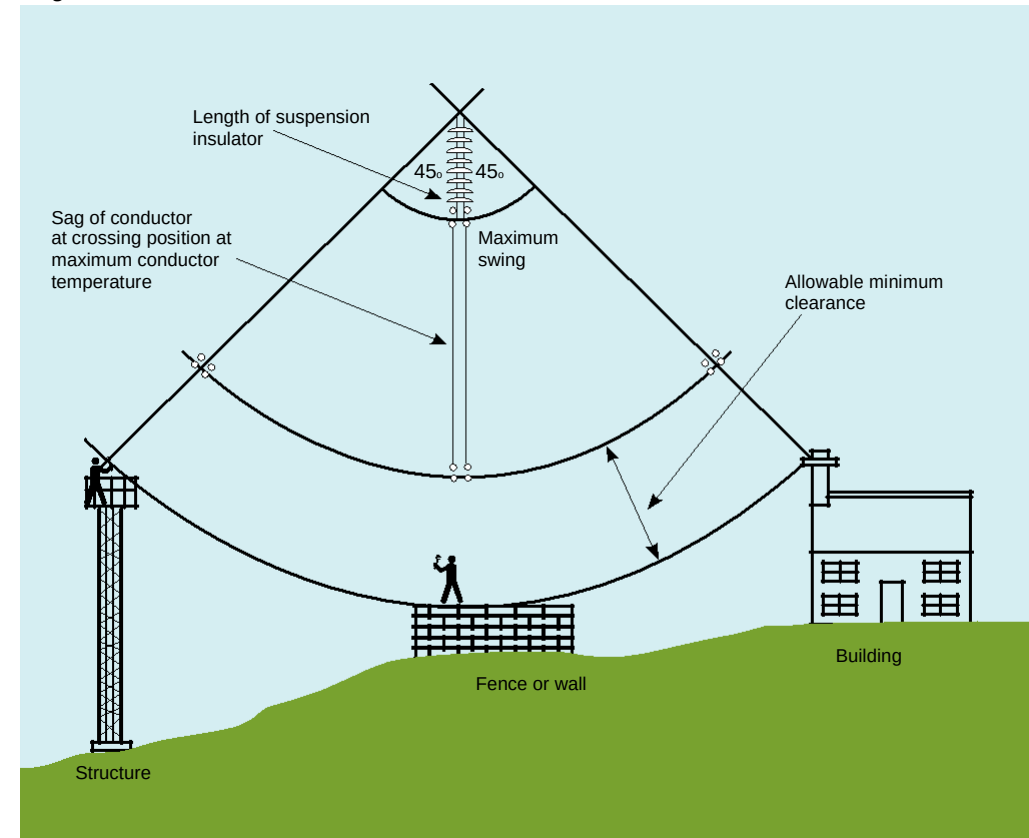
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

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

Section continues on next page »



The undergrounding of electricity cables at Ross-on-Wye

« Section continued from previous page

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.

Section continues on
next page »

« Section continued from previous page

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.

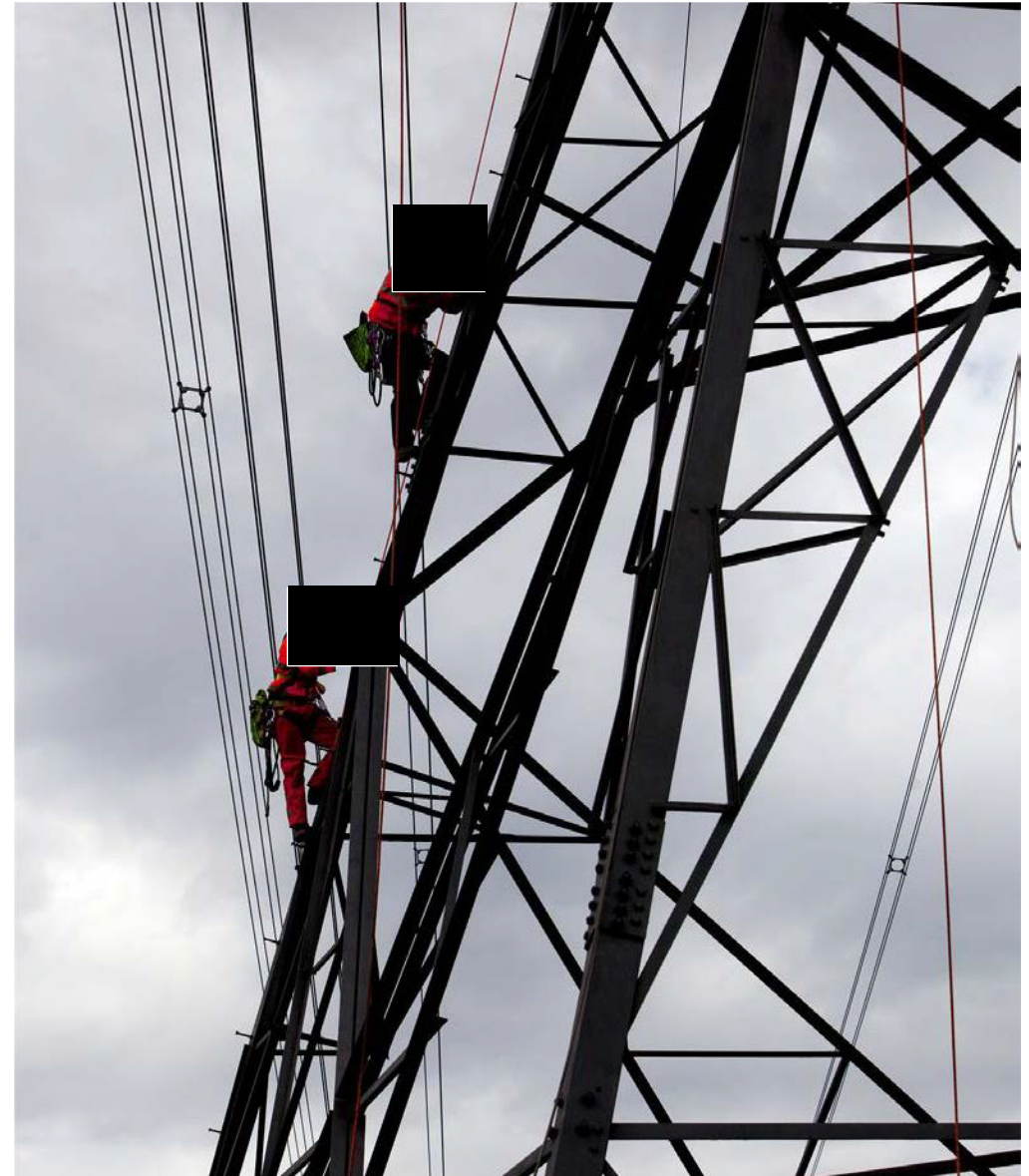
Maintenance access

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

Section continues on next page »





« Section continued from
previous page

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.

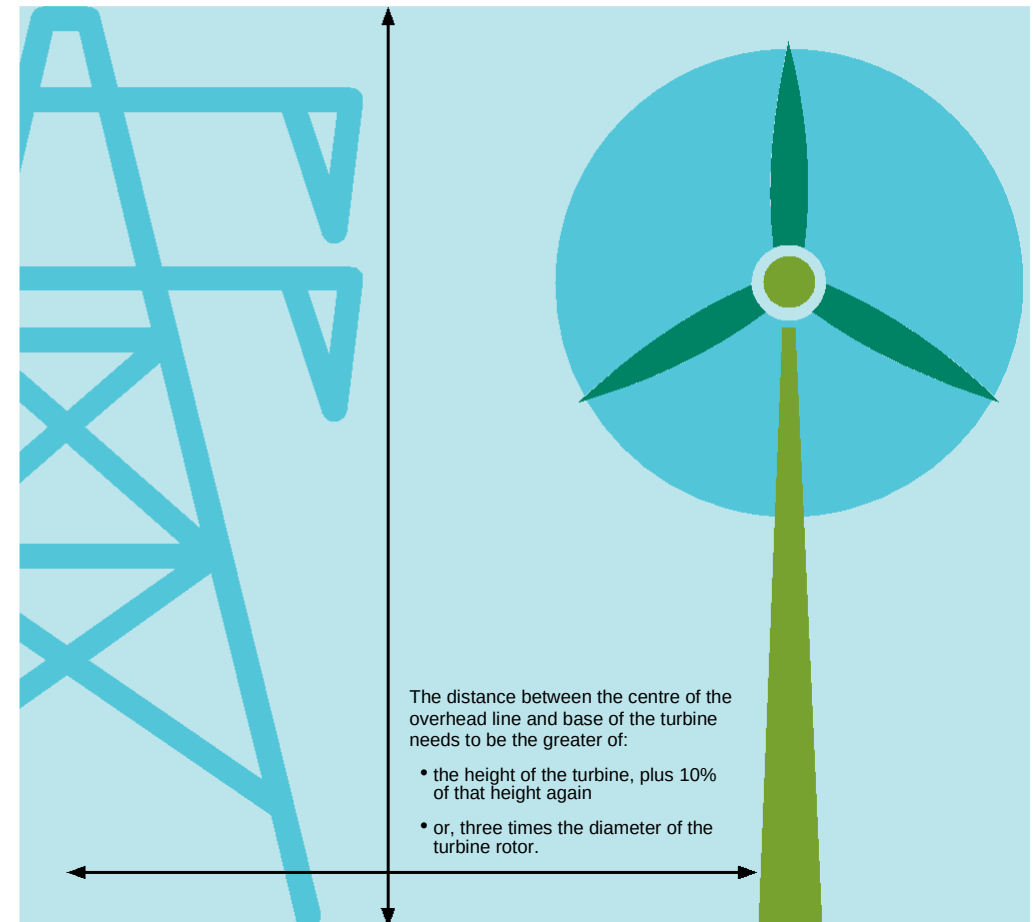
Commercial and housing developments

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.

Section continues on next page »

Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



« Section continued from previous page

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.

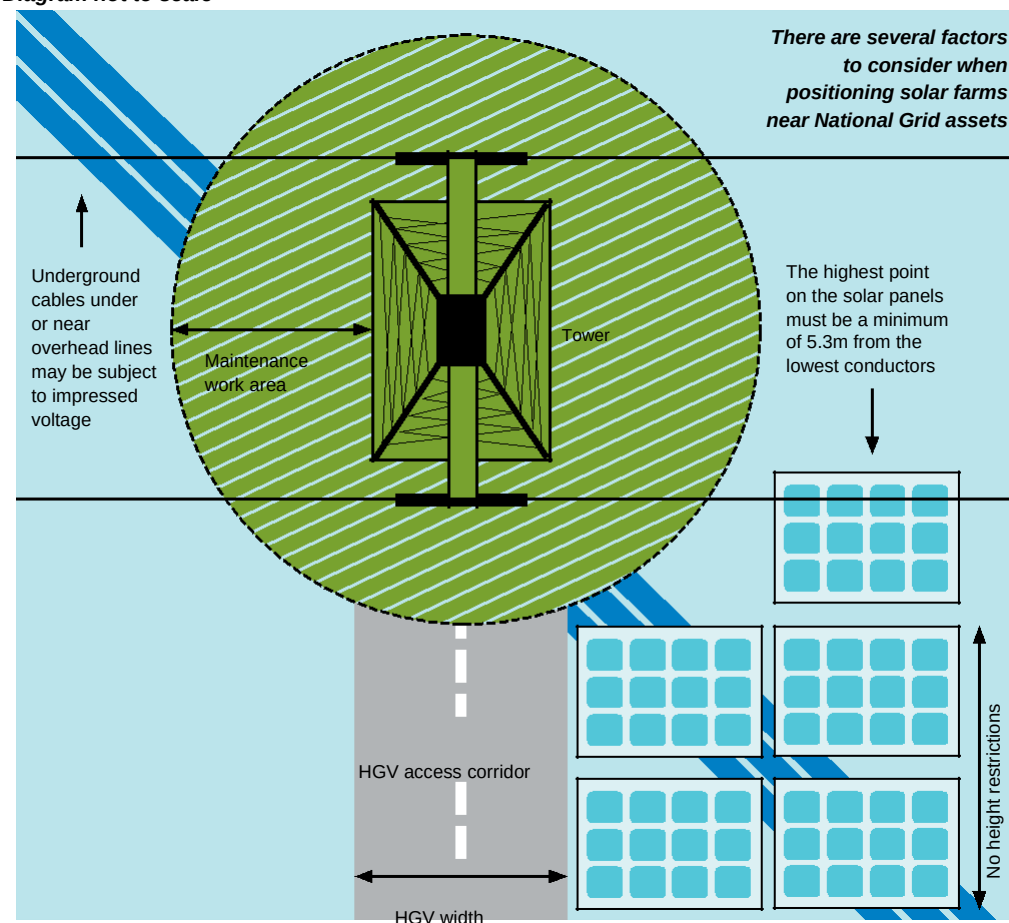
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

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

**Copyright © National Grid plc
2021, all rights reserved**

All copyright and other intellectual property rights arising in any information contained within this document are, unless otherwise stated, owned by National Grid plc or other companies in the National Grid group of companies.

(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

**X & Y Co-ordinate of tower base.
Route & Tower Number
Tower Type**

Span Length (m)

Height of Conductor Attachment Point Above OS GB

Bottom Conductor Displayed at Max Sag

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

North Arrow

OHL Plan View & Downward Looking Imagery

5.3m Clearance line at Max Swing Orange dashed line

Section Operating Voltage, Conductor Type, Conductor Name, Bundle Configuration & Sagging Condition

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

ENA43-8 Clearance to Objects at 400kV

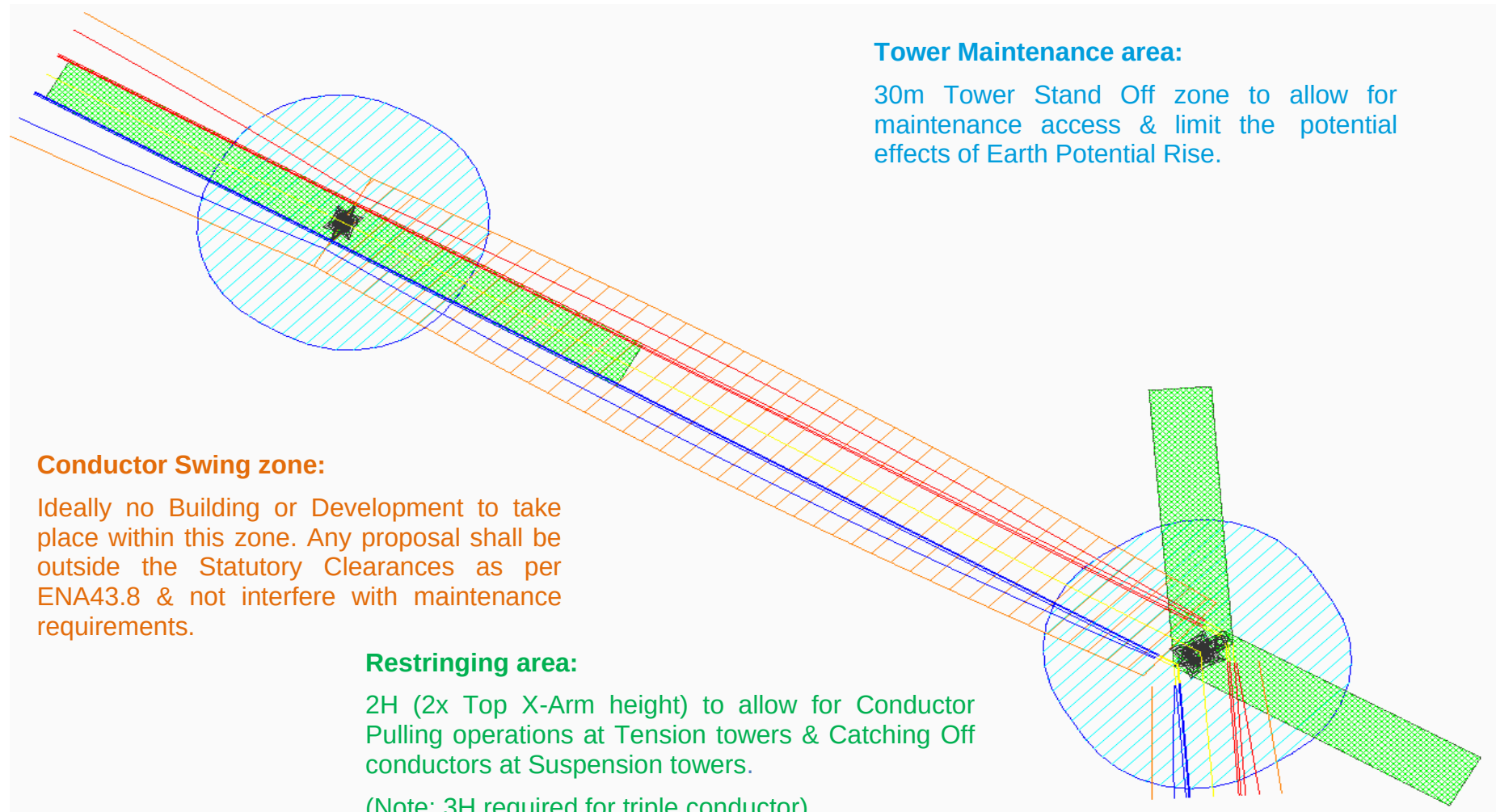
Swing & Sag Diagram

NG Drawing Specific Data

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area





Planning Inspectorate

Email:

tarchoninterconnector@planninginspectorate.gov.uk

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

6 May 2026

Scoping Opinion Consultation – EN0210009

Proposal: Application by Tarchon Energy Limited (the applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the proposed development)

NH ref: NH/26/15766

Dear Sir/Madam,

Request for Transport Scoping response for the proposed Tarchon Interconnector

Thank you for consulting National Highways (NH) as per your letter of 08 April 2026 regarding the EIA Scoping Report submitted in support of proposals for the Tarchon Interconnector Nationally Significant Infrastructure Project (NSIP).

NH has a vested interest in managing the Strategic Road Network (SRN) in the vicinity of the A120 which traverses the scoping boundary. When considering the impact of the proposals on the SRN, our interest focuses on the assessment of the nearby junctions which comprises the A120 from the A130 Junction, towards Harwich.

We have undertaken a high-level review of the assessment methodology within the EIA Scoping Report, in respect of Traffic and Transport and our thoughts are outlined below. This response provides sufficient details of NH's requirements to enable the applicant to prepare relevant documents in support of the application for a Development Consent Order (DCO).

This response includes further recommendations we envisage to see and the Applicant to consider as part of further work.

Traffic and Transport Chapter

We welcome that an outline Traffic and Transport Chapter has been prepared, and that the assessment methodology is clearly set out.

We agree that the use of the IEMA 2023 guidance is the appropriate basis for assessing highways impacts. We also recommend that reference should also be made to guidance and standards in the DMRB in terms of highways assessments. We welcome that reference is made to the DfT Circular 01/2022, which provides guidance regarding how the impact of the proposed development on the SRN should be assessed. We further recommend the Applicant makes reference to 'The strategic road network and the delivery of sustainable development (National Highways and the strategic road network)'.

It is welcomed that an Outline Construction Traffic Management Plan will be provided, as we consider this to be a key document which will secure the necessary mitigation for the scheme. We recommend that the Travel Plan measures in respect of construction workers is fully detailed within the document, or a Construction Worker Travel Plan is prepared. Nonetheless we welcome that construction, operation and decommissioning phases will be included in the assessment.

It is accepted that a Transport Assessment Note (TAN) is an appropriate way to provide information that could potentially be missed from a Traffic and Transport Chapter, for example SRN specific impacts, junction modelling, access design matters, cumulative schemes or detailed collision analysis.

With regard to potential impacts on key junctions and highway links, we wish to highlight that depending on the effect of the proposals, the study area within the SRN will not necessarily solely comprise the adjacent junctions. Through further engagement, we wish to establish the extent of effects on the SRN, both in traffic terms and in terms of design and access interventions that may affect the SRN. It is possible that the works could be such that Walking, Cycling, Horse riding Assessment Review (WCHAR, DMRB GG142) and Safety Risk Assessment (SRA, GG104) could be required at points on the SRN where there are interactions with the Project.

In terms of data sources, with regard to baseline traffic flows, we would recommend further engagement on the use of flows or conduct of traffic surveys. Furthermore, we recommend that queue surveys are taken at the same time as traffic surveys for ease of validation in the event of junction assessment. Any SRN related traffic surveys would require the necessary permissions.

We recommend that the applicant's consultant obtains the PIA data from the local highway authority based on the study area which should be agreed beforehand and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and causation, and it is important to note that the period from March 2020 until August 2021 (inclusive) will not be accepted due to the COVID-19 pandemic and therefore a longer period should be included.

DfT Circular 01/2022 recommends in Paragraph 50 that an opening year assessment is carried out, which is likely to be different to the typical scenarios including peak operation. It is also recommended that engagement takes place in order to reach agreement with local authorities regarding traffic growth and committed / cumulative development. We consider the proposed cumulative schemes to be reasonable but note that these are minimum and that other new schemes may require inclusion over the course of the application for DCO.

The assessment scenarios, methodology and outputs for distribution and for traffic flows are considered reasonable, subject to being demonstrated on the local and strategic highway network. Information from the assessments should provide us with an indication of any junction assessments that would be expected to be carried out. These assessments will be important in terms of establishing the extent of the requirement for traffic mitigation measures.

I hope that the above is clear and will allow you to proceed, if you need anything further, please do not hesitate to contact me.

Yours sincerely



Spatial Planner
National Highways
Operations (East)

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 01 May 2026 08:55
To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>
Subject: RE: EN0210009 - Tarchon Interconnector Project - EIA Scoping and Consultation and Regulation 11 Notification [SG41426]

You don't often get email from natssafeguarding@nats.co.uk. [Learn why this is important](#)

Our Ref: SG41426

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

Date: 06 May 2026
Our ref: 35924
Consultation: 545864
Your ref: EN0210009



Environmental Services Infrastructure Decisions and Applications
Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear [REDACTED]

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 Tarchon Energy Limited (the ‘Applicant’) for an Order granting Development Consent for Tarchon Interconnector Project (the Proposed Development).

Scoping consultation and notification of the Applicant’s contact details and duty to make available information to the Applicant if requested

**Proposal: Tarchon Interconnector Project
Location: South of Harwich, Essex, East Anglia, United Kingdom (UK), and
Niederlangen, Lower Saxony, Germany**

Thank you for your letter dated 08 April 2026 consulting Natural England on the Tarchon Interconnector project Environmental Impact Assessment (EIA) Scoping Report. This response constitutes Natural England’s formal statutory advice. It is provided without prejudice to any further advice that Natural England may wish to offer in response to subsequent submissions, and the receipt 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 (nm)). As the application is located partially in offshore waters outside English territorial waters, the Joint Nature Conservation Council (JNCC), the statutory nature conservation body in offshore UK waters (beyond 12 nautical miles) has been requested to respond to this consultation. For

offshore aspects, Natural England and the JNCC will submit separate responses which will advise on areas within our statutory remits. Therefore, we defer to JNCC's expertise for offshore elements (beyond 12nm). Where designated sites or mobile interest features span this boundary, our response is aligned.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on a Development Consent Order (DCO).

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Please see the following Annexes A to C to this letter for Natural England's advice in relation to the EIA scope for this development:

Annex A – summary of main issues – a summary of Natural England's key comments for offshore, intertidal and terrestrial elements of the proposals.

Annex B – guidance for EIA Scoping requirements – Natural England's general advice on the offshore, intertidal and terrestrial scope of the EIA for this development.

Annex C – detailed comments – Natural England's detailed advice on project-specific aspects of the Onshore and Offshore Elements 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 Natural England must be consulted on Environmental Statement/ Application documents. We advise that sufficient time should be given to thoroughly assess the survey data, undertake Expert Topic Group consultation, and implement actions where necessary prior to submission.

If you have any queries relating to the advice in this letter, please consult Natural England at consultations@naturalengland.org.uk.

Yours sincerely

Major Marine Casework
West Anglia Area Team

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/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/>

Annex A – EN0210009 Tarchon Interconnector Project – Natural England’s advice on EIA Scoping – Summary of main issues

1. Approach to scoping

It is noted that due to the timing of the scoping report the information contained therein 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 as regards 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, in most instances 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 of the potential environmental concerns.

There is a risk with premature scoping, and submission of preliminary environmental information 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 pre application documentation, 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, Applicants, 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 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 the timing of ‘the scoping’ we have focused our advice the known issues of greatest importance/risk taking into account the likelihood of significant effects on the environment.

In these scenarios we also advise that 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. Energy transmission – Coordinated approach

Natural England notes that the scoping report only considers the infrastructure required for the project's grid connection. Natural England recommends that a coordinated approach with other transmission projects should be considered. The National Policy Statements (NPS) for electricity networks infrastructure ([National Policy Statement for electricity networks infrastructure \(EN-5\), 2025 - GOV.UK](#)) provides greater weight to a more coordinated approach and should be regarded as a material consideration. Section 2.13.4 states '*It is recognised that proposed projects which have progressed through strategic network design exercises have been considered for strategic co-ordination through those exercises. However, any opportunities for subsequent local co-ordination between projects, irrespective of whether they have been through those exercises, should be considered in project development.*' There is more emphasis on coordination in section 2.13.11 and an expectation for project level to evidence and demonstrate an appropriate consideration in the assessment of options. Section 2.13.11 states '*The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible. This includes taking account of geographically proximate projects including opportunities to connect wind farms and multi-purpose interconnectors and/or bootstraps with each other that are planned or foreseen in the near future. Evidence should demonstrate that this has been considered in the assessment of options.*'

4. Impacts to Marine designated sites

The development of the Project is likely to result in cabling through or adjacent to the following marine and coastal designated sites located within 12nm of the English coastline:

- Orford Inshore MCZ
- Kentish Knock East MCZ
- Blackwater, Crouch, Roach and Colne MCZ

- Margate and Long Sands SAC
- Southern North Sea SAC
- Hamford Water SAC
- Alde, Ore and Butley Estuaries SAC
- Orfordness – Shingle Street SAC
- Southern North Sea SAC

- Outer Thames Estuary SPA
- Bruine Bank SPA
- Hamford Water SPA
- Stour and Orwell Estuaries SPA
- Alde-Ore Estuary SPA
- Deben Estuary SPA

Please see Annex B and/or 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 advice documents are currently stored on a SharePoint Online site, access to the SharePoint 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.

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, such as energy transmission via offshore cables.

We also sign post the Applicant to the joint Natural England and JNCC best practice for subsea cables for English Inshore and UK offshore waters [Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK offshore waters, Sept 22](#). In addition, we refer the applicant to our [Cabling Lessons Learnt guidance](#). Further guidance is 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.

6. Intertidal (Landfall)

Natural England notes the proposed landfall site on the Essex coast south of Harwich and north of Hamford Water. Currently, the English Onshore Scheme (EOS) Scoping Boundary covers a large area to provide a wide corridor for cable routing options. We also note that the final location of the Converter Station has not yet been determined; although it is stated that it will be sited within 5km of the East Anglia Connection Node (EACN) (in accordance with National Grid's Horlock Rules for siting electrical infrastructure).

We acknowledge the preference for a trenchless methodology for cable installation at landfall, which we support as it would minimise disturbance and potential adverse effects on designated ecological sites within the intertidal and nearshore environment adjacent to the UK landfall, including the Hamford Water SPA, SAC, Ramsar site and NNR.

However, we recognise that open-cut trenching may be required to cross the intertidal area in certain circumstances. In this regard, Natural England advises that the project should commit to the use of trenchless installation techniques (e.g. HDD) at landfall wherever feasible, with HDD exit pits located entirely within the subtidal zone to avoid direct impacts

on the sensitive intertidal habitats and features of conservation importance.

The feasibility of trenchless techniques will ultimately depend on ground conditions and constraints at the selected landfall location. Accordingly, the worst-case scenario (WCS) / maximum design scenario (MDS) should robustly assess whether the use of open-cut trenching within the intertidal zone can be reasonably ruled out, and, if not, ensure that the potential impacts of such works are appropriately assessed and mitigated.

Natural England provides the following high-level advice regarding the technical aspects of landfall:

- *Geotechnical Information*

Experience from other cable installations along the English North Sea coastline, 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 recognising that the first 30m from the entry pit is where most frac-outs are likely to occur.

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 projects, noting this maybe be outside this project's consent boundary.

- *HDD Method Statement and Contingency plan*

In relation to HDD and potential bentonite frack-out/break out we draw the Applicant's attention to the North Falls OWF [EN010119-001612-7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan \(Rev 4\).pdf](#). We believe this to be a good example of what is required and would welcome Tarchon providing a similar document.

- *Exit pit locations*

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.

Please see further information relating to landfall in Annex B and Annex C.

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):

7. 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 (except landfall) 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.

8. Protected landscape

The English Onshore Scheme scoping boundary includes the Dedham Vale National Landscape, and Suffolk and Essex Coast and Heaths National Landscape. A Landscape and Visual Impact Assessment (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 their (2023-2028 and 2026-2031, respectively) Management Plans: [Management Plan – Suffolk & Essex Coast & Heaths National Landscape](#) ⁴ [Management Plan – Dedham Vale National Landscape](#).

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.

9. Designated sites – bird surveys

Regarding the proposed bird survey methods and frequency, we note there will be a single year of survey. We advise 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 SPA/ Ramsar functionally linked land.

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)

⁴ <https://coastandheaths-nl.org.uk/managing/management-plan/>

10. Habitat severance

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.

11. Cumulative impacts

Natural England is aware that both North Falls and Five Estuaries Offshore Wind Farms (OWFs) intend to connect into National Grid's proposed East Anglia Connection Node (EACN), with the aim of co-locating their onshore substations near the EACN substation. The potential for cumulative ecological and visual impacts with the Tarchon project will need to be considered and assessed. Furthermore, although the proposed landfall for both North Falls and Five Estuaries OWFs is Holland Haven Marshes SSSI, south of the Tarchon landfall search area, there may also be potential cumulative impacts through the lifetimes of the projects (including mismatched decommissioning schedules) which need to be carefully considered and assessed. As the scoping boundary is refined, more detailed advice on cumulative impacts will be provided by Natural England at Expert Topic Group (ETG) meetings with the Applicant during the pre-application process. We would also encourage the Applicant to seek opportunities to collaborate with North Falls and Five Estuaries OWFs.

Annex B – EN0210009 Tarchon Interconnector Project – Natural England’s general advice on EIA Scoping requirements (for offshore, intertidal 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

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the Application. All supporting infrastructure and activities should be included within the assessment.

The Application should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and

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)

activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects.
- b. approved but uncompleted projects.
- c. ongoing activities/impacts.
- 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 in 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 include, but are not limited to:

- Belgium Energio Nordsoon Denmark
- Borselle
- COAM
- East Anglia 1, 1 North, 2, 3, Offshore Windfarms
- Eastern Green Link 3,4 and 5
- Greater Gabbard Offshore Windfarm
- Galloper Offshore Windfarm
- Gunfleet Sands 1 and 2 Offshore Windfarms
- Five Estuaries Offshore Windfarm
- Lion Link
- London Array Offshore Windfarm
- Nautilus
- Neu Connect
- Norfolk Projects (Vanguard East, Boreas) Offshore Windfarms
- North Falls Offshore Windfarm
- Norwich to Tilbury East Anglia Connection Node (EACN) (Tarchon's proposed connection node);
- Ossian Transmission Infrastructure
- Sea Link
- A large variety of existing telecoms cables.

Natural England advises that all plans/projects which have ongoing impacts that impact upon protected sites and their qualifying features should be included. As such, assessment of in-combination effects will need further detailed consideration at application. Natural England advises the project to adopt Natural England's Best Practice Advice ([Environmental considerations for offshore wind and cable projects - Home](#)) and use the tiered system for scoping projects into cumulative / in-combination assessments.

Natural England's advice on the scope and content of an Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/> . We advise that all Applications use this as a template. The Planning Inspectorate uses a four

staged approach to Cumulative Effects Assessment (CEA) with the Applicant required to fill in templates [4 Stage CEA Process](#).

3. Environmental data

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.

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., low to moderate, or moderate to high) and it is nearly always the lower value that has been taken forward. Indeed, to date no offshore windfarm or cable NSIP has identified ecological impacts that are assessed as significant in EIA terms, either cumulatively or in-combination.. 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. However, this translates into a vast number of variables,

⁶ [Bird Migration Atlas](#)

⁷ [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

causing difficulties in identifying and assessing a realistic worst-case scenario for each of the relevant receptors with any certainty, which in turn necessitates precautionary assessments given this uncertainty. This then also presents challenges when it comes to identifying appropriate mitigation measures and/or places over precautionary compensatory requirements on Applicants.

4.3. Outline Plans

Natural England advises that outline documents, plans and/or assessments 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 all 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 National Landscapes and their 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.

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

The development site is within or may impact on the following **European/internationally designated nature conservation sites including up to 12 nautical miles:**

- Margate and Long Sands SAC
- Southern North Sea SAC
- Hamford Water SAC
- Alde, Ore and Butley Estuaries SAC
- Orfordness – Shingle Street SAC
- Southern North Sea SAC

- Outer Thames Estuary SPA
- Bruine Bank SPA
- Hamford Water SPA
- Stour and Orwell Estuaries SPA
- Alde-Ore Estuary SPA
- Deben Estuary SPA

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

If the proposal outlined within the scoping document has the potential to significantly affect features of the designated sites and the activity is not directly connected to the management of any designated site it should be assessed under regulation 63 the Conservation of Species and Habitats Regulations (2017)/ regulation 28 of the Conservation of Offshore Species and Habitats regulations (2017) (as amended). Should a Likely Significant Effect on an Internationally designated site be identified or be uncertain, the competent authority (e.g., the Marine Management Organisation or Local Planning Authority or Government Department) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA/Application process.

If during the EIA/Application process the potential for a Likely Significant Effect on the conservation objectives of the sites cannot be ruled out the competent authority for the licence/consent (MMO / Government Department/LPA) should undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives. Noting case law (People Over Wind⁹) measures intended to avoid and/or reduce the likely harmful effects on an internationally designated sites cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site, therefore consideration is required at Appropriate Assessment. Natural England wishes to be consulted on the scope of the Habitats Regulations Assessment and the information that will be produced to support it and should be formally consulted on any Appropriate Assessment provided for the proposal (Regulation 63/28).

The consideration of Likely Significant Effects (LSE) should include any functionally linked habitat 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>

⁸ [East Atlantic Flyway: England East Coast Wetlands - UNESCO World Heritage Centre](#)

⁹ *People Over Wind and Sweetman vs Coillte Teoranta* (ref: C 323/17).

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](#).

At this stage, as the cable corridor and onshore converter station are 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 also 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> 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 Hamford Water SPA/Ramsar and the nearby Stour and Orwell SPA/ Ramsar site. These impact pathways should be fully addressed within the HRA. This should assess impacts on Little Oakley Compensation Site which has been identified as being legally required to compensate for impacts on the Stour and Orwell SPA from the port development at Bathside Bay and functionally linked land outside the designated site boundaries which may be used and relied on by SPA/ Ramsar birds for foraging habitat and roosts.
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.

5.3 Highly Protected Marine Areas (HPMAs), Sites of Special Scientific Interest (SSSI) and Marine Conservation Zones (MCZs)

5.3.1 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 application should include a full assessment of the direct and indirect effects of the development on the site and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The proposal may affect the following **Marine Conservation Zone** which spans the 12nm boundary and therefore jointly managed with the JNCC: **Orford Inshore MCZ Kentish Knock East MCZ Blackwater, Crouch, Roach and Colne MCZ**

The application 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 an Environmental Statement (ES)/Application documents.

5.3.2 Highly Protected Marine Areas (HPMAs)

The red line boundary of the Project does not fall within or adjacent to any HPMAs located within 12 nautical miles.

Further information on the location of existing HPMAs can be found at Highly Protected Marine Areas (HPMAs) – GOV.UK (www.gov.uk). The MEA should include a full assessment of the direct and indirect effects of the development on the features of any HPMAs and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse effects.

Please note: As the cable corridor is currently an area of search, at this stage we are unable to provide a more definitive list of sites relevant to the project.

The application documents should include a full assessment 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.

Internationally designated site conservation objectives are available on our internet site: <http://publications.naturalengland.org.uk/category/6490068894089216>

5.4 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 a definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

- Little Oakley Channel Deposit SSSI
- Hamford Water SSSI,
- Stour Estuary SSSI,
- Orwell Estuary SSSI,
- Alde-Ore Estuary SSSI
- Deben Estuary SSSI
- Harwich Foreshore SSSI,
- The Naze SSSI
- Clacton Cliffs and Foreshore SSSI
- Holland Haven Marshes SSSI

The project has the potential to impact designated sites as a result of atmospheric pollutant deposition arising from construction traffic. Sites that are beyond the 2km buffer but could still be impacted.

The geological SSSI Little Oakley Channel Deposit overlaps into the EOS Scoping Boundary, north-east of Little Oakley. This SSSI provides a reserve of Pleistocene interglacial channel-fill sediments, unique in Britain and is of great importance for Quaternary studies.

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](https://naturalengland-open-data-geoportal.azurewebsites.net/).

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.

5.5 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 groups. 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 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended) 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](#).

ES/Application should assess the impact of all phases of the proposal including site characterisation surveys on protected species (for example, pinnipeds (seals), cetaceans (including dolphins, porpoises, and whales), fish (including seahorses, sharks, and skates), marine turtles, birds, marine invertebrates, bats, crested newts, reptiles, water voles and badgers). Information on the relevant legislation protecting these species can be reviewed on the following link <https://www.gov.uk/government/publications/protected-marine-species>. 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 sought from appropriate local biological record centres, nature conservation organisations, [NBN Atlas](#), groups, and individuals; and 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 conservation of species protected by law 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 area likely to be affected by the proposal 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.

In order to provide this information, there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants.

The requirement for a European Protected Species (EPS) licence should be considered. EPS licences for marine species are issued by the MMO and advice on this should be sought from them. More information regarding EPS licences can be found here: [European protected species: apply for a mitigation licence \(A12\) - GOV.UK](#)

For Land Based Impacts: Natural England has adopted [standing advice](#) for terrestrial protected species which includes links to guidance on survey and mitigation. All other information on protected species can be found in 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards'

Natural England has already engaged with the Applicant regarding protected species through our discretionary advice service in relation to the English Onshore Scheme Ecological Survey Strategy and Methodologies, which was provided to the applicant on the 16 April 2026 (NE Ref: DAS/35936/540672). The NE Wildlife and Licensing Service (NEWLS) is able to engage with the Applicant on 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

The ES/Application should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here

<https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity> .

Government Circular 06/2005 also states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions.' Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES.

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 those species and habitats included in the relevant Local BAP as well as the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Brownfield 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 and other irreplaceable habitats

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. The ES should assess the impacts of the proposal on ancient woodland, ancient and veteran trees and other irreplaceable habitats, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Paragraph 193 of the National Planning Policy Framework (NPPF) and the [Energy National Policy Statement EN-1](#) (paragraphs 5.4.14 - 5.4.15) set 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/IEMA/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. Designated Landscapes and Landscape/Seascape Character

10.1 Nationally Designated Landscapes

The development site is within or may impact on the Dedham Vale National Landscape, and Suffolk and Essex Coast and Heaths National Landscape.

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.

¹⁰ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

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).

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 Essex 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

¹¹ <https://assets.publishing.service.gov.uk/media/65bbfbd9709fe1000f637052/overarching-nps-for-energy-en1.pdf>

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 National Landscapes, we advise the assessment includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status. The Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-28 can be found here: [Management Plan – Suffolk & Essex Coast & Heaths National Landscape](#) and the Dedham Vale National Landscape and Stour Valley Project Area Management Plan 2026-2031 can be found here: [Management Plan – Dedham Vale National Landscape](#))¹²

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

¹² <https://dedhamvale-nl.org.uk/managing/management-plan/>

ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- 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 is likely to require a detailed Agricultural Land Classification (ALC) survey to inform the consenting phase, 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

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 Adaptation

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 NPPF 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 164), 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. In other words, consider how will cable burial and siting of infrastructure be managed throughout the lifespan of the project?

We advise that 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. Plus, 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

In addition, Natural England's position provided for Outer Dowsing Offshore Windfarm, 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. Where that is not possible, every effort should be made to mitigate the impacts. In order to achieve this, we advise that a cable burial risk assessment is undertaken as part of the application process informed by comprehensive geotechnical and geophysical surveys. If cable protection is required options that have the greatest success of removal with least impact to interest features should be taken forward. A site integrity plan could then be used to determine the risk to the conservation objectives for the site and determine the requirements for any compensation measures.

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

If not already considered, we advise Applicants to utilise the following, but not limited to, datasets to inform their assessments

- 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>
- Small Cetaceans in European Atlantic waters and the North Sea (SCANS) IV [SCANS-IV survey](#)
- Special Committee on Seals 2025 - *Scientific Advice on Matters Related to the Management of Seal Populations: 2025* [Scientific Advice on Matters Related to the Management of Seal Populations: 2025](#)
- *Sympatric Seals, Satellite Tracking and Protected Areas: Habitat-Based Distribution Estimates for Conservation and Management. Front. Mar. Sci. 9:875869. doi: 10.3389/fmars.2022.875869, 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 Outer Thames Estuary SPA depending on the transit route. As such, we advise appropriate consideration of both seasonal timing of planned construction and O&M works, and vessel transit route is included within the application.

Natural England recommends that 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 minimum use of best practice measures between 1st November and 31st March inclusive 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.
- A 20-knot speed limit applied to all vessels in the area including support and crew transfer vessels.
- 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, toolbox talks).

Although, we do highlight that dependent on the level of proposed activity across the designated site the best practice protocol as set out above still may not minimise the in-combination impacts to an acceptable level.

Annex C – EN0210009 Tarchon Interconnector Project – Natural England’s advice on EIA Scoping – Project-Specific Detailed Advice to the Offshore and Onshore Elements of the Scheme

C.1 UK Project Description

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	N/A	N/A	Natural England notes that no draft Development Consent Order was provided with the documentation.	This is not unusual for the scoping stage. However, we would recommend engaging with us on a draft DCO prior to application to identify and resolve issues with the drafting ahead of the more pressured examination process.
2	V.1.2.4	2.4.2.5	Natural England notes that 20% of the UK Marine Scheme (UKMS) cable route may be subject to rock placement (or other mitigations), although we acknowledge that the target is for 100% cable burial. No specific details are available, and the cable route has not yet been defined.	Natural England advises that the Maximum Design Scenario (MDS) external cable protection will need to be provided including footprint and volumes. Locations of external cable protection along the UKMS should also be provided, overlain with locations of sites of nature conservation importance and ecological/sensitive receptors. We also advise that a realistic Worst Case Scenario should be presented rather than an arbitrary 20%, especially where there potential interactions with designated sites
3	V.1.2.4	2.4.8.2	Natural England notes that the Grid Connection has not yet been confirmed. The location of the Tarchon Converter Station has also not yet been determined. However, it is stated that this will be sited within 5km of the East Anglia Connect Node (EACN) in accordance with National Grid’s Horlock Rules for siting electrical infrastructure. This presents a number of risks in terms of the current project scope and the baseline characterisation for the	Natural England advises that should the grid connection point be located outside the areas considered within the Scoping Report, it may be necessary to rescope the project. Natural England reserves the right to amend or update our opinion based on the final grid location, once it is known. These uncertainties and risks will require careful attention during the Evidence Plan Process (EPP).

			EIA	
4	V.1.2.4.4	2.4.4.9-2.4.4.14	Natural England notes that works at the proposed UK landfall will be undertaken in two seasons (separate years) and that completion of the second season works may not occur in the year immediately following season one. Depending on the time period between the two seasons of works, and the extent of habitat and feature recovery, we are concerned that this could lead to cumulative effects due to the successive rather than concurrent timing of the works.	Natural England advises that consideration should be given to potential cumulative effects due to successive rather than concurrent landfall. The worst-case scenario (WCS) landfall works in terms of scheduling and impacts to habitats and species will need to be identified.
5	2.4.4	2.4.4.15	Natural England notes that construction access to the proposed UK Landfall is likely to be via a temporary access track or haul road from the existing road network. In addition, as the location of the proposed UK Landfall is not known, there may instead be a requirement for a permanent access, which will be determined later in the pre application or application phase of the project. The use of access routes at landfall may lead to disturbance of, or harm to, sensitive areas of intertidal/nearshore habitat and species.	In order to provide further advise, the Applicant will need to provide information on the extent sensitive areas of beach/coastal frontage and supporting habitat might be disturbed due to construction activities at landfall. An assessment should be discussed during the EPP and presented in the ES.
6	V.1 2.4.8	2.4.8.3-2.4.8.4	Natural England highlights that North Falls Offshore Wind Farm (NFOWF) and Five Estuaries Offshore Wind Farm (VEOWF) will also connect into National Grid's proposed EACN Substation. The EOS, NFOWF and VEOWF are only envisaged to interact in close proximity to National Grid's EACN Substation. However, we are concerned that there may be potential	Natural England advises that potential interactions between the North Falls, Five Estuaries, and Tarchon onshore cables or onshore substation will need to be considered.

			cumulative effects.	
7	V.1. 2.7	2.7.1.2	Natural England notes that it is stated that as part of the decommissioning of the UK Scheme, the offshore cables and any external cable protection may be either fully removed or left in-situ. Natural England highlights that under OSPAR that there is currently a requirement to return the seabed to its pre-impacted state.	Natural England advises that options to use more readily removal cable protection are explored especially within designated sites even if compensation measures are required.

C.2 Marine Physical Environment

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	V.3. 13.4	13.4.1.2 & Table 13-1	Natural England notes that climate change effects have not been considered in the Marine Physical Environment Chapter.	Natural England advises that it is important to consider climate change allowances both in the description of baseline conditions and the following phases of EIA. Please also see our comments below on coastal change. We also signpost to the sea level and extreme wave height allowances, and coastal erosion risk guidance at: Flood risk assessments: climate change allowances - GOV.UK
2	V.3. 13.5	13.5.1.1 & 13.5.2 & Table 13-1	Natural England notes that the use of old and/or existing data sources (e.g. coastal frontage, tides, waves) have been used to inform the Marine Physical Environment chapter and, baseline characterisation	Natural England advises that when using existing or previously collected data, it is important to demonstrate their suitability for, and direct applicability to, the existing conditions at/across the study area for the proposed development. Moreover, it is important that both the contemporary conditions within the study area and the longer-term historical change are adequately characterised. It is also important to demonstrate that previously collected data remain valid (i.e. not out-of-date) for the intended purpose. As a general benchmark, we advise that care should be taken when considering datasets

				older than five years. However, this is highly specific to the receptor, location, and project design. For example, in dynamic seabed areas, recent bathymetric data will be needed to inform understanding of seabed mobility and cable burial risk. The spatial and temporal extent of the baseline should also be informed by the potential for cumulative effects.
3	V.3. 13.5	Table 13-1	Natural England notes that there is only partial coverage of the Marine Physical Environment (MPE) Study Area for the Scoping Marine Physical Environment chapter.	Natural England advises that the location and extent of data source coverage should be provided on a map to inform understanding of any evidence gaps that may need to be addressed.
4	V.3. 13.5	13.5.2.23	Natural England notes that wave data from previous studies have been used to inform the baseline characterisation. However, this does not include any recent wave climate data. The West Gabbard wave buoy data have been used to inform the baseline characterisation.	Natural England advises that more recent data (both offshore and inshore) should be used to inform the baseline. For example, more recent wave data are available from the West Gabbard 2 directional waverider (offshore) and Felixstowe Waverider (inshore).
5	V.3. 13.5	13.5.2.12	Natural England notes that the landfall beach profile data used to inform the baseline characterisation provide useful information on historical coastal change, although they only cover the period from 1991-2006. No recent evidence of coastal change has been included.	Natural England advises that up-to-date coastal change data should also be used to inform the baseline characterisation. Natural England advises that the National Coastal Erosion Risk Mapping project (NCERM2; https://www.data.gov.uk/dataset/4b723013-b676-4202-aab5-a2bc449c72fb/national-coastal-erosion-risk-management-ncerm), should also be used.
6	V.3. 13.5	13.5.4.1	Natural England notes that UKMS-specific surveys will be used to enhance understanding of baseline conditions including output from geophysical and benthic surveys. However, it is not stated if this includes geotechnical surveys and particle size analysis.	Natural England advises that geotechnical survey and Particle Size Analysis (PSA) data should be provided for the UKMS. In addition, the baseline sediment regime should be characterised and mapped based on up-to-date data.

7	V.3. 13.5	Figure 13-6 & 13.5.2.14	Natural England notes that the regional sediment transport pathways identified in Figure 13-6 only encompass the most southwestern portion of the UKMS and not the majority of the offshore sections. Furthermore, the data used to inform the sediment transport pathways characterisation are unlikely to be a true representation of present environmental conditions.	Natural England advises that regional sediment transport pathways should be identified and mapped for the full extent of the UKMS based on the most up-to-date evidence available.
8	V.3. 13.5	13.5.2.37	Natural England notes that sediment sampling data from the Five Estuaries Offshore Windfarm (OWF) project have been included in the sediment quality baseline characterisation. However, the suitability of these data in terms of temporal and spatial overlap with the Tarchon UKMS and Zone of Influence (ZOI) has not been demonstrated.	While we note and welcome the proposed site-specific sampling being undertaken to refine understanding of sediment contamination in the UKMS Scoping Boundary to inform the EIA; we advise, it is important to demonstrate the suitability of all previously collected data. For example, for sediment sampling, the distance between sample locations and the area of interest.
9	V.3. 13.5	Table 13-5	Natural England notes that not all designated sites within the UKMS Zone of Interest have been listed in Table 13-5. There may be designated sites that provide important supporting habitat or processes (e.g. Southern North Sea SAC or Outer Thames Estuary SPA) that are relevant to the Marine Physical Environment (MPE). Furthermore, we note that geological sites of conservation importance have not been identified.	Natural England advises that all designated sites within the MPE Zone of Influence (ZOI) should be listed for consideration within the MPE impact assessment and identified on a map. In addition, geological sites of conservation importance located within the ZOI should be included.
10	V.3. 13.5	13.6.1.7	Natural England notes that the Applicant considers empirical assessment and analysis of the evidence base is likely to be sufficient, without the need for standalone numerical modelling.	Natural England advises that the requirement for standalone numerical modelling should be informed by appraisal of the available data, environmental conditions in the ZOI, project design, environmental risks, presence of sensitive habitats/species or

				important marine processes receptors etc. We note that the Applicant intends to further consult with stakeholders on this prior to ES submission, which we would welcome.
11	V.3. 13.5	Table 13-12	Natural England notes that seabed mobility has not been included in the baseline characterisation.	Natural England advises that seabed mobility should be assessed. This will inform understanding of cable burial risk and engineering design. Mobile seabed features should be identified along the UKMS, along with their migration rates, trends and directions.
12	V.3. 13.5	Table 13-13	Natural England highlights that Table 13-13 considers some, but not all Marine Physical Environment receptors. However, we acknowledge that at this early stage and with a large Scoping Boundary that this may well be expanded on in following EIA stages.	Natural England advises that all Marine Physical Environment receptors (e.g., morphological features) within the ZOI should be identified, including sites of conservation importance (ecological and geological). These should be overlain on relevant maps.
13	V.3. 13.5	Table 13-13	Natural England acknowledges that Table 13-13 of project elements is currently high level. However, it conflates multiple sources of impact pathways and phases of development into one impact. In addition, some impacts and receptors are missing from the table.	Natural England advises that in the next stages of EIA, the summary of potential impacts/changes on the Marine Physical Environment should be simplified and impacts/phases separated appropriately. For example, <i>“Construction - Increases in SSCs and associated sediment deposition of sediments due to seabed preparation activities.”</i> It would also be helpful to consider offshore and landfall separately where relevant. All sensitive receptors should be identified and assessed.
14	V.3. 13.5	Table 13-13	Natural England highlights that Impact 1 & Impact 4 in Table 13-13 are similar and both consider changes to seabed level/morphology.	Natural England advises, as above, that these impacts should be streamlined and defined according to Scheme phase i.e. <i>“Construction - Potential impacts to seabed morphology (designated sites, sandbanks, sandwave areas, navigation channels and other notable seabed features).”</i>
15	V.3. 13.5	Table 13-13	Natural England notes that Impact 5 in Table 13-13 considers modifications to littoral transport and coastal behaviour	Natural England advises that the EIA should consider impacts to coastal and seabed morphology due to all activities associated with cable installation (e.g.

			(erosion), including landfall due to cable installation and HDD (Construction, Decommissioning). While we acknowledge the early stage of the application processes, there are often multiple activities and equipment associated with cable installation and HDD activities associated infrastructure that may be used during construction which could alter waves and/or current flows, sediment transport and morphology.	cofferdams, access ramps, jack-up and dynamic positioning vessels etc).
16	V.3. 13.5	Table 13-13	Natural England notes that the following element has been scoped out for Marine Physical Environment: Seabed scouring due to cable protection (during Operations and Maintenance (O&M)) also need to consider impacts on other receptors e.g. coast Also, we note that seabed scouring has only been considered in relation to cable protection during the O&M phase. We highlight that construction-related scouring could also arise (e.g. due to presence of temporary cofferdams at landfall). We also consider that there is insufficient detailed baseline information on the seabed material, seabed mobility, and sensitivity of receptors, presently to scope out this element at such an early stage.	Natural England advises that seabed scouring for both construction and O&M phases should be scoped into the assessment.
17	V.3. 13.5	Table 13-13	Natural England notes that changes to offshore and nearshore seabed morphology arising from changes in sediment transport processes/pathways due to the presence of cable	Natural England advises that changes to coastal and seabed morphology arising from changes to flows and waves that drive sediment pathways/processes due to the presence of cable protection/crossings, should be considered in the EIA.

			protection/cable crossings have not been considered in the elements to scope in/out.	
18	V.3. 13.5	Table 13-13	Natural England notes that there are potential impacts to the King Charles III Coastal Path which is located in proximity to the coastline and passes through the eastern extent of the EOS Scoping Boundary. However, we understand that direct construction impacts are considered avoidable through the use of trenchless techniques (e.g. HDD). We also note that the UK landfall will be crossed using trenchless techniques (e.g. HDD, pipe pushing or similar). Whilst we welcome the avoidance of impacts at landfall through use of trenchless techniques, feasibility of these methods is currently unknown.	Natural England advises that thorough consideration should be given to all of the potential impacts from landfall options, and geotechnical data provided to demonstrate the Horizontal Directional Drilling (HDD) is achievable at this location. Geotechnical information should be provided to demonstrate the technical feasibility of HDD. The merits of all landfall options from an ecological perspective should be evaluated and the scale and significance of any likely impacts considered and adequately assessed.
19	V.3. 13.5	13.7.4.1, 13.7.4.2, 32.6, & Annex A32-1, Table A32-2	Natural England understands that a full detailed assessment of both cumulative and transboundary effects will be provided as part of the ES. Currently, there are no specific details for us to comment on.	Natural England will review the list of projects and impacts considered in the Cumulative Effects Assessment when made available at a later stage of EIA. However, we consider that impacts to the marine physical environment (e.g. changes to seabed morphology, SSCs, sediment transport) should not be scoped out at this early stage, given the wide offshore scoping boundary and limited evidence base.
20	V.3. 13.5	13.8.1.3	Natural England notes the assumption that the dredged material associated with the usage of a Trailer Suction Hopper Dredger (TSHD) (i.e. for sandwave clearance) will be deposited locally offshore (i.e. a suitable distance from the cable installation trench) and not transported to land or disposed of at a	Natural England advises that all efforts should be made to avoid areas of sandwaves, and where sandwave levelling is considered necessary, impacts should be appropriately assessed and efforts made to minimise impacts. Moreover, where sandwave levelling is anticipated, dredged material should be 'intelligently' placed to aid sandwave recovery. An indicative sandwave levelling location map should be

			licensed disposal ground. We advise that both levelling of sandwaves and disposal of sandwave dredged material could have affect designated sites, or other areas of sensitive seabed/marine processes receptors.	provided in following phases of the EIA.

C.3 Benthic & Intertidal Ecology

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	N/A	General	Natural England notes the cable route has not yet been defined. Natural England's ability to advise on environmental impacts to benthic receptors is limited without further refinement of the Maximum Design Scenario (MDS).	Natural England advises that the Applicant further refines the MDS as far as possible in order to allow for the assessment of the project worst-case scenario (WCS) to be based on realistic impacts. The application should contain a full assessment of potential impacts to designated sites and protected features via a Habitats Regulations Assessment (HRA) and/or Marine Conservation Zone (MCZ) Assessment. Natural England advises that the mitigation hierarchy should be followed when considering potential impacts to benthic/intertidal receptors and designated site features. The application should demonstrate how all possible impacts have been avoided before consideration of mitigation measures. If impacts upon designated features cannot be avoided or mitigated, compensation and/or Measures of Equivalent Environmental Benefit (MEEB) may be required.
2	N/A	General	Natural England notes that one possible cable option routes through Margate and Long Sands Special Area of Compensation (SAC).	Natural England advises that the cable corridor should avoid benthic Marine Protected Areas (MPAs) wherever possible. If the cable routes through Margate and Long Sands SAC, every effort should be made to minimise impacts and where hinderance of the conservation objectives remain we advise that compensation will likely be required for impacts to

				benthic receptors.
3	N/A	General	Natural England notes that the potential impact of Unexploded Ordnance (UXO) clearance works is not considered for benthic receptors. Whilst UXO investigation and clearance requires a separate marine licence applications at the post-consent stage, Natural England advises against assessing impacts on benthic receptors from project components separately as this approach presents a risk that the project impacts are not appropriately assessed.	Natural England advises that impacts to benthic receptors, including designated features and ecologically important species and habitats, from UXO clearance works should be assessed during the application phase. This is especially important for where UXO clearance works may affect designated sites or features.
4	V.1. 2.3.4	2.3.4.2	Natural England notes that external cable protection methods will be considered further during the pre-application and application following geophysical surveys and ongoing cable route studies. Options considered at this stage include concrete mattress and rock bags and other more readily removable options.	Natural England would welcome further refinement of the MDS within the pre-application phase and ES stages to inform the assessment of the WCS for external cable protection. The quantity of external cable protection and footprint should be specified, and the Applicant should demonstrate how the quantity of external cable protection has been minimised where possible. Natural England advises that consideration should be given to the full removal of external cable protection at decommissioning phase. Natural England also advises that figures should be provided at later EIA stages to identify locations of external cable protection or seabed preparation works (e.g. sandwave levelling).
5	V.1. 2.4.2	Table 2-2	Natural England welcomes the commitment to bundle the two High Voltage Direct Current (HVDC) cables together.	To note.
6	V.1. 2.4.4	Table 2-4	Natural England notes that trenchless technologies, e.g. Horizontal Directional Drilling (HDD), are proposed at landfall, but	Natural England advises that feasibility studies, informed by geotechnical investigations, should be undertaken to inform on the likely success of HDD

			that no feasibility studies have been proposed to demonstrate the likely success of trenchless landfall methods.	installation methods at the cable landfall location.
7	V.1. 2.4.4	2.4.4.9	Natural England notes that the landfall works for cable installation will take place across two seasons (separate years) – first season for trenchless techniques, and second season for cable pull in. This may risk disturbing the same areas twice, during the two separate events, thereby hindering recovery of benthic receptors.	Natural England advises that the later stages of EIA should consider the impact of temporally separated disturbance impacts upon benthic receptors, including any effects on the ability of the benthos to recover from repeated impacts.
8	V.1. 2.4.4	2.4.4.15	Natural England notes that construction access to the proposed UK landfall will be likely required.	Natural England advises that the impact of construction access routes and movement of vehicles and works should be scoped into assessments, especially if impacts may occur to intertidal receptors.
9	V.3. 14.5.1	Table 14-1	Natural England notes that some survey data used to inform the desk-based study for baseline characterisation is over 10 years old. Natural England supports the use of existing data to supplement site-specific surveys in certain situations. However, the use of data older than 10 years is not considered appropriate and limits confidence in the data and conclusions.	Natural England advises that data older than 10 years should not be used to inform the baseline characterisation, unless for context only. If/where older data are used, their age should be highlighted and limitations of their suitability and adequacy for characterising contemporary conditions stated. Please refer to Natural England's best practice advice (Phase I) for more information on principles for using existing datasets. Natural England also advises that the use of existing datasets cannot replace the requirement for site-specific surveys to inform on the baseline characterisation and assessment of impacts upon benthic receptors. Recent (< 2 years) site-specific data is required to inform environmental assessments for impacts and inform mitigation measures for benthic receptors.
10	V.3. 14.5.4	14.5.4	Natural England welcomes the proposal for geophysical surveys, drop-video transects and sediment grab samples from within the	Natural England advises that further information needs to be provided on the proposed survey methods and how they will adequately inform the benthic

			UKMS. However, information on the survey scope, extent, and adequacy to characterise the baseline benthic environment and protected features is limited.	characterisation and identify features of conservation importance. Natural England refers to our best practice advice documents (Phase I) which details minimum data and evidence expectations at the baseline characterisation phase.
11	V.3. 14.5.2	14.5.2.17	Natural England highlights that <i>S. spinulosa</i> biogenic reef is an Annex I qualifying habitat, as well as a NERC Act Section 41 habitat of principal importance. Based on historic records and evidence from adjacent offshore windfarms, we highlight that there is a high likelihood of <i>S. spinulosa</i> biogenic reef being present.	Natural England advises that targeted drop-imagery surveys, informed by geophysical surveys, will be required to identify the presence and spatial distribution of <i>S. spinulosa</i> reefs (using Gubbay, 2007; Jenkins et al., 2015) and other NERC Section 41 Habitats of Principal Importance. This information is required to inform environmental assessments and the requirement for mitigation measures, following the mitigation hierarchy.
12	V.3. 14.5.2	14.5.2.22	Natural England notes that the data used to form the baseline for intertidal benthic ecology at the landfall site was from an intertidal survey for Five Estuaries OWF, located 13km south of the project, and no further surveys are planned for intertidal benthic ecology. Natural England strongly disagrees with the use of data collected 13 km south of the landfall search area and advise that these data will not be sufficient to inform the assessment of intertidal receptors from landfall works.	Natural England advises that site-specific intertidal benthic ecology surveys are required at the landfall site to inform the environmental baseline and inform assessment of impacts. Natural England refers the Applicant to our best practice advice documents (Phase I) which provide detailed advice on minimum intertidal data and evidence requirements.
13	V.3. 14.5.2	14.5.2.32	Natural England notes that Ramsar sites have not been considered along with other designated sites in order to avoid duplication.	Natural England highlights that Ramsar features do not always align with the designated features of the underpinning SPA/SSSI sites and should be considered accordingly. Natural England advises that Ramsar sites should be considered independently and assessed as part of the Habitats Regulations Assessment (HRA) process, as per Government policy .

14	V.3. 14.5.2	Table 14-2	Natural England notes that the list of bird features within the designated features/interest column of Table 14-2 contains numerous errors. In addition, some SSSI notified features are missing.	Natural England advises that the list of designated Special Protection Area (SPA) bird features and SSSI notified features are carefully considered in order to ensure that potential impacts to all designated features are appropriately assessed. Natural England advises that SPAs should be also considered within the HRA for potential impacts to supporting habitats, benthic prey species and bird food availability.
15	V.3. 14.5.2	Table 14-2	Natural England notes that the Southern North Sea SAC, designated for harbour porpoise, has not been considered in the list of designated sites/features.	Natural England advises that impacts to the Southern North Sea SAC should be scoped in due to potential for the project to affect prey populations and therefore food availability for harbour porpoise within the SAC.
16	V.3. 14.7.2	14.7.2.1	Natural England welcomes the commitment to micro-site infrastructure, where practicable, to avoid sensitive benthic features.	Natural England advises that micro-siting mitigation should be undertaken for all benthic species and habitats of conservation importance, including qualifying Annex I habitats (such as <i>S.spinulosa</i> biogenic reef or stony reef), and Annex V species of the Habitats Regulations, species listed under Schedule 5 of the Wildlife & Countryside Act, OSPAR species, and habitats and designated features of the MPA network (e.g. SAC and MCZ features). Where avoidance is not possible it will need to be clearly demonstrated how impacts have been minimised.
17	V.3. 14.7.3	Table 14-6	Natural England notes that underwater sound impacts on benthic receptors during the construction, maintenance and decommissioning phase has been scoped out.	Natural England advises that insufficient evidence has been provided to scope underwater noise impacts out at this stage.
18	V.3. 14.7.3	Table 14-6	Natural England disagrees that accidental pollution should be scoped out from further assessment due to the adoption of PLONOR substances " <i>where practicable</i> ". The implementation of PLONOR substances as stated will not eliminate all	Natural England advises that accidental pollution is scoped into assessment as a potential impact pathway for benthic receptors. We would therefore expect a HDD management plan which manages bentonite Frac-outs.

			risk as the text does not imply it will never be used. If there is a possibility of using a non-inert fluid it should be scoped into the assessment.	
19	V.3. 14.7.3	Table 14-6	HDD has not been considered as a source of temporary habitat disturbance to benthic and intertidal receptors. Natural England disagrees and advises that HDD works and associated infrastructure have the potential to temporarily disturb benthic / intertidal receptors.	Natural England advises that HDD works should be scoped into assessments as a potential impact to benthic and intertidal ecology receptors. In addition, trenched landfall options must also be assessed if they remain an option of the project description / MDS.
20	V.3. 14.7.4	14.7.4.3	Natural England notes that only increases in suspended sediment and sediment deposition have been scoped into the cumulative effects assessment. However, we advise that insufficient evidence has been provided to support scoping out of other impact pathways at this stage	Natural England advises that other impact pathways should not be scoped out of cumulative effect assessments at this stage, unless supported by strong evidence.
21	A32-1.4.2	Table A32-2	Natural England notes that Chapter 14 confirms that there is potential for transboundary effects to arise from: • Temporary increases in SSC and sediment deposition; and • Direct and indirect seabed disturbance leading to the release of sediment contaminants Natural England disagrees with this as there is currently not enough information available to do a detailed assessment at the scoping stage. Therefore, other potential effects (as mentioned in volume 5 chapter 14) cannot be ruled out for the Benthic and Intertidal Ecology Study Area, which overlaps with the Belgian and Netherlands EEZs	Natural England advises that further evidence is required to support scoping out other potential transboundary effects

	A32-1.4.2	Table A32-2	Natural England notes that some benthic impacts have been scoped out when assessing potential transboundary effects.	Natural England defers to JNCC for consideration of cross-border effects.

C.4 Fish & Shellfish Ecology

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	V.3.15	General	Natural England defers to the expertise of Cefas on matters relating to fish and shellfish where these are not qualifying features of designated sites, nor prey species associated with designated features. Natural England's role is to advise on the features of designated sites in the context of their conservation objectives, ensuring that sites function effectively and make an appropriate contribution to the Marine Protected Area network.	To note
2	V.3.15	Table 15-1	Natural England is content that all key sources of fish and shellfish data have been recognised within Table 15-1, including all relevant existing offshore development data within the scope of the UK Marine Scheme (UKMS). However, should additional developments be proposed or consented within the study area prior to submission of the Project application, Natural England advises that any relevant new baseline data should be incorporated and used to inform the Environmental Impact Assessment (EIA),	To note

			where available at the time.	
3	V.3.15	15.5.3.3	Natural England welcomes the consideration of herring and sandeel in relation to their reliance on specific sediment types that support their demersal spawning behaviour. However, it is important that the EIA also considers these species within the broader ecological context of their role as key prey species for qualifying features of overlapping designated sites, notably harbour porpoise in Southern North Sea SAC and breeding tern species in Outer Thames Estuary SPA.	Natural England recommends that herring and sandeel are assessed within the context of their role as key prey species for designated features of overlapping and adjacent designated sites, with potential changes in prey availability considered as an indirect pathway within the relevant assessment chapters.
4	V.3.15	15.5.3.9	Natural England notes the reference to the use of Reach <i>et al.</i> , (2013) classifications as a foundational principal. We welcome the use of updated method statements (Kyle-Henney <i>et al.</i> , 2024; Reach <i>et al.</i> , 2024) for identifying and mapping herring and sandeel spawning habitats.	To note
5	V.3.15	Table 15-6	Natural England is content that all designated sites of relevance to fish and shellfish ecology have been included in this table.	To note
6	V.3.15	Table 15-11	Natural England does not agree with screening out impacts of ' <i>direct damage</i> ' to fish receptors on the basis that they are mobile species. While many fish are mobile, some species are characteristically slow-moving, exhibit limited mobility during particular life-stages, or are spatially localised due to specific habitat preferences.	Natural England advises that the potential for direct damage to fish receptors should be scoped in and assessed appropriately.

7	V.3.15	Table 15-11	Natural England advises temporary habitat loss, in addition to permanent and, or long-term habitat loss should also be considered as an impact pathway during the construction phase. Natural England notes that installation methodology will depend on ground conditions and cable burial assessment. Accordingly, at this stage, the extent and nature of seabed disturbance are uncertain.	Natural England recommends that temporary habitat loss is scoped into the assessment as a potential impact pathway and assessed appropriately. Seabed preparation activities and cable installation and burial have the potential to impact benthic spawning species temporarily during construction. Such disturbance may result in indirect impacts to prey availability for designated species such as seabirds and marine mammals. The extent and nature of seabed disturbance due to cable installation needs to be specified and appropriately considered and assessed.
8	V.3.15	Table 15-11	Natural England does not agree that the implementation of a Construction Environmental Management Plan (CEMP) in isolation provides sufficient justification for scoping out the potential impact of <i>'increased risk of introduction and/or spread of INNS'</i> for fish receptors. The presence of a CEMP manages the risk of impact but does not eliminate the underlying impact pathway, it is therefore not appropriate to rely on a CEMP as justification for scoping out a potential impact.	Natural England advises that at this early stage of the project, and need to define the cable route further, the increased risk of introduction and/or spread of Invasive Non-Native Species (INNS) should be scoped in for assessment.
9	V.6. A. 22-2		Natural England defers to Cefas on the adequacy of underwater noise modelling. However, we note that herring are a species particularly sensitive to underwater noise, as such they should be considered appropriately within the assessment, including their role as a key prey species for designated features of adjacent designated sites.	Natural England recommends that the potential effects of underwater noise on noise-sensitive fish species, including herring, are appropriately assessed, considering their ecological function as prey species for designated features.

10	V.6. A. 22-2		Natural England is content with the proposed underwater noise methodology as it relates to continuous (non-impulsive) sound sources. However, Natural England defers to Cefas on the detailed adequacy and technical robustness of this approach.	To note.
11	V.6. A. 22-2	A22-2.5.2.4	Natural England recognises that permanent threshold shift (PTS) impacts have not been referenced on the basis that no high-energy impulsive sound sources are proposed. While no high-energy impulsive sound sources are currently anticipated, this will not be confirmed until the next stage.	Natural England advises that, should high energy impulsive sources be introduced to the project following refinement of the methodology or project design, a full underwater noise assessment appropriate to impulsive sound sources would be required, in line with Popper at al. (2014).
12	V.6. A. 32-1	Table A32-2	Natural England is content with scoping in transboundary effects for fish and shellfish.	To note

C.5 Marine Mammal Ecology

Point	Section	Para/ Table/Fig Ref	Comments	Recommendations
1	V.3. 16.2.3	16.2.3.6	Natural England advises that the regional study areas and relevant seal management units should be determined based on the maximum foraging range (Carter et al., 2022). The maximum foraging range for grey seal is 448 km and harbour seals 273 km, and not the stated average foraging distance of 100km and 50km, respectively. Additionally, telemetry data should also be used to determine connectivity, especially connectivity with Special Areas of Conservation (SACs) and transboundary sites.	Natural England advises consulting Carter et al., (2022) on the maximum foraging ranges and consider telemetry data for connectivity.
2	V.3. 16.3.6.	16.3.6.1	Natural England highlights that the National Marine Fisheries Service (NMFS), 2024 ' <i>Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0)</i> ' should be included in the list as these technical guidelines have superseded Southall et al., 2019.	Natural England advises adding the 2024 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 2.0) to the list of relevant guidelines. The Applicant should also refer to the Defra Noise Policy 2025. Reducing marine noise - GOV.UK
3	V.3. 16.5.3	16.5.3.1.	Natural England highlights that bottlenose dolphin should be added to the list of marine mammal receptors due to their southward expansion into English waters.	Natural England advises addition of bottlenose dolphin to the list of marine mammal receptors.
4	V.3. 16.7.3	Table 16.8	Natural England agrees with the scoping exercise.	To note.

5	V.6. Annex 22-2	A22-2.5.3.3	Natural England highlights that the most up-to-date marine mammal exposure criteria is NMFS-2024 ' <i>Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0)</i> ' which supersedes Southall et al., 2019 and is accepted by Natural England and other Statutory Nature Conservation Bodies (SNCBs).	Natural England advises that the Applicant should consider the most up-to-date technical guidelines for underwater sound assessment.

C.6 Ornithology

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	V2. 10		No comment on Ornithological Onshore Biodiversity at this time.	Natural England has no comments at this time.
2	33	33.1.1.2 & Table 33-1	Natural England notes the proposed Environmental Statement (ES) structure and are broadly in agreement with the approach. However, we consider that 'Ornithology' should be located with other ecological receptor chapters rather than the present 'UK Scheme Wide' volume.	Natural England advises that 'Ornithology' would be better placed with other ecological receptor chapters within the ES. Moreover, it may be appropriate to consider placing 'Offshore Ornithology' with other marine ecological chapters (e.g. benthic, fish, marine mammals) whilst 'Onshore Ornithology' may be more suited to the 'Onshore Biodiversity' chapter.
3	V4. 22.1	22.1.6.6-7	Natural England welcomes that the noise assessment outputs will be informed by the waterbird disturbance mitigation toolkit developed by Cutts, Hemingway & Spencer (2013). However, we highlight additional more recent work on disturbance distances should also be given consideration too e.g. Goodship & Furness (2022).	Natural England advises noise assessment outputs are informed by best practice and the best available evidence incorporating, where appropriate, data published on-line by NatureScot in Research report 1283 (Goodship & Furness, 2022).
4	V.4. 23.6	Tables 23-8	Natural England notes that the Applicant	Natural England advises scoping in potential impacts

		and 23-9	has scoped out impacts on red-throated diver (RTD) from the Appropriate Assessment on the basis that the proposed mitigation is an embedded feature of the project design inherent within the plan. While Natural England welcomes the embedded mitigation (Table 23-8), it should be noted that, as a general rule, mitigation cannot be applied during scoping to conclude no Likely Significant Effect (LSE), where it has been applied specifically to reduce impacts on a designated feature. Furthermore, LSE can only be ruled out during the screening stage of the HRA. The seasonal restriction and vessel management plan (VMP) have been imposed to limit environmental impacts, primarily for RTD, and should not, therefore, be regarded as an inherent or embedded part of the project design.	to RTD for Appropriate Assessment. Note - according to the People over Wind Judgment for Habitats Regulations Assessments and advice taken from Gov.uk website '<i>The judgment clarified that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures. As a result, a competent authority may only take account of mitigation measures intended to avoid or reduce the harmful effects of a plan or project as part of an appropriate assessment itself</i>' Appropriate assessment - GOV.UK
5	V.4. 23.6	Table 23-8	Natural England notes that the vessel management plan (VMP) does not include a 20-knot speed limit. However, there is evidence that vessels travelling more than 20 knots can exacerbate displacement effects on RTD by increasing return times following a disturbance (Burger <i>et al.</i>, 2019).	Natural England advises that where relevant a -knot speed limit should be added to the VMP and to all vessels in the area (including support and crew transfer vessels).
6	V.4. 23.6	Table 23-8	Natural England notes that it has not been explicitly stated whether the seasonal restriction in the OTE SPA and 2km buffer will apply to all works associated with cable installation (including seabed preparation).	Natural England advises that further clarity is required on works which will be limited by the seasonal restriction in the OTE SPA. For example, will it include both seabed preparation and cable laying activities?

	V.4. 23.6	Table 23-9	Natural England notes that impacts from pollution (inclusive of indirect effects) for the offshore and onshore work have been scoped out on the basis that the CEMP will be sufficient to ameliorate this risk., However, we highlight that there may be construction-related impacts from pollution and to water quality (e.g. due to temporary increased turbidity associated with HDD bentonite and sediment disturbance and the risk of fuel spills during construction).	Natural England advises this impact pathway should be scoped in and then, if appropriate, screened out during the HRA screening process as described above.
7	V.4. 23.4	23.4.1.17	Natural England notes that the winter bird surveys were undertaken early morning or prior to dusk. Natural England highlights that the British Trust for Ornithology (BTO) advice for the recent winter bird surveys is to avoid the hour after dawn and the hour before dusk as this risks conflating the counts or double counting with birds on the move to and from roost sites or gathering to do so.	Natural England advises that winter bird surveys should follow the BTO guidance. Interpretation of the baseline characterisation will need to consider how activity around dawn and dusk may affect the data.
8	V.4. 23.4	23.4.1.12 and 23.4.1.24	Natural England highlights that in our previous Discretionary Advice Service (DAS) consultation letter (following the March 5 th presentation by the Applicant) we highlighted that the intertidal survey area in Year 1 that was based on a 500m buffer around the proposed Landfall location was insufficient. This was because for sites that are of importance for curlew, we	Natural England advises that the basis for the intertidal bird survey ZOI, should be clarified. The Applicant should also ensure that surveys in Year 2 encompass sufficient ground to account for worst case impacts on curlew. This should provide reassurance that the baseline characterisation adequately covers all species likely impacted by the project in this environmental sector.

			recommend a buffer of 650m - due to their potential disturbance at this distance (Goodship & Furness, 2022). For Year 2, the Applicant has stated ' <i>surveys will cover all areas considered within the zone of influence (Zol) of the landfall zones</i> ', but it is unclear if this Zol incorporates our advice.	
9	V.4. 23.4	23.4.1.38-39	Natural England notes that the ornithological baseline characterisation for the EOS has been partially compromised by limited coverage primarily due to access restrictions and incomplete survey coverage in Year 1. It is proposed that these limitations will be addressed (Section 23.4.1.39) through improved survey coverage in Year 2 and a desk study. However, we are concerned that these measures may be insufficient to address the survey gaps, leading to a need for further work. This should be scoped in.	Natural England advises provision for additional surveys should not be ruled out particularly if new evidence emerges or provision of access improves. Notably, few data were obtained during evenings or after dark when Schedule 1 species such as barn owl (<i>Tyto alba</i>) or species of conservation concern such as nightjar (<i>Caprimulgus europaeus</i>), (Annex 1 of Birds directive and S41 of NERC) would be more typically found. Nocturnal surveys may also help identify important sites for roosting waders.
10	V.4. 23.4	Table 23-4	Natural England notes that the additional sources of ornithological data used to characterise the offshore environment does not include recent digital aerial survey (DAS) data from the OWEC funded POSEIDON project.	Natural England advises that the Applicant uses data obtained from the DAS undertaken for the POSEIDON project. These can be accessed for free online at the Marine Data Exchange website and will help characterise the offshore ornithological baseline with the most recent data.
11	V.4. 23.6	Sections 23.6.4.3 and 23.6.4.5-6	Natural England notes that the Applicant presents contradictory statements on the likely presence of transboundary effects from the UKMS indicating none have been identified and that they can be scoped out (see section 23.6.4.3) but that the potential for effects cannot also be ruled out and that they will be considered in the ES (sections	Natural England advises transboundary effects are not scoped out at this stage (notably given the proximity to the Bruine Bank SPA in Dutch sector) and they should be considered for offshore ornithology in the ES. We note Table A32-2 of the Transboundary Screening matrix has screened in impact pathways for offshore ornithology where the project boundary

			23.6.4.5-6)	lies adjacent the Belgian and Dutch sectors.
12	V.5. 32.5	32.5.1.3	Natural England notes that a list of major existing and planned infrastructure is presented including key OWFs. Whilst not exhaustive the list does not include London Array OWF in the OTE SPA.	Natural England advises that the London Array OWF should be included in the cumulative assessment. London Array OWF became operational after the OTE SPA was designated and therefore its ongoing impacts on SPA qualifying features do not form part of their baseline counts.
13	V.6. Annex 32-1	Table 32-3	Natural England notes that the PINS Transboundary Screening Information table omits offshore ornithology in the list of environmental topics with potential impact pathways (pg 21).	Natural England advises that offshore ornithology should be added to list of environmental topics with potential transboundary impact pathways in the 'potential impacts and carrier' row of Table 32-3. This would provide reassurance these effects will be considered and also align with the Applicant's justifications in Table A32-2.

C.7 Onshore Environment

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	V.1. 2	2.4.4.7	Natural England notes: <i>"The proposed UK Landfall will be installed using trenchless techniques (such as HDD, pipe jacking, or similar), or potentially open cut where necessary to cross the intertidal area. Preferentially a trenchless methodology would be chosen in order to minimise disruption and potential negative impacts to the designated ecological sites within the intertidal and nearshore adjacent to the UK Landfall area, such as the Hamford Water Special Protection Area</i>	Natural England advises that the crossing of these important ecological features (trenchless or otherwise) remains a key consideration for us and the full environmental impact of this proposal will need to be considered both within the framework of EIA and HRA as appropriate

			(SPA), Special Area of Conservation (SAC), Ramsar site and National Nature Reserve (NNR)."	
2	V.1. 2	2.4.4.5	Natural England notes: <i>"An outline Construction Environmental Management Plan (CEMP) will accompany the DCO application, which will describe the framework of mitigation measures identified in the ES to be followed and to be carried forward to a Detailed CEMP prior to construction."</i>	Natural England advises that consideration of mitigation requirements should be conducted at the earliest opportunity to ensure that the most appropriate measures can be incorporated into design proposals.
3	V.1.2	2.4.4.7	Natural England highlights that for HDD and TJB entry/exit and construction activity the following could be an issue for SPA bird features - Displacement from feeding/roosting areas - Reduced breeding success if disturbance overlaps nesting season - Increased energy expenditure during critical winter period from disturbance could be an issue but not if constructing works avoided with November - March seasonal restriction	Natural England advises that impacts on SPA bird features need to be adequately considered and assessed.

4	V.1.2	2.4.5.2	Natural England highlights that direct habitat disturbance on SSSI, SPA and NNR could occur through: - Cable installation (HDD frac-out, jetting, trenching) - Survey ground-truthing in intertidal areas Both would cause temporary loss of habitat (although we acknowledge that these may be localised and small-scale in nature).	Natural England advises that direct habitat disturbance on SSSI, SPA and NNRs need to be adequately considered and assessed.
5	V.1.2	2.4.5.6	Natural England highlights that Water quality/pollution could result from: - Temporary increased turbidity associated with HDD bentonite and sediment disturbance - Risk of fuel spills	Natural England highlights that impacts on water quality need to be adequately considered and assessed.
6	V.2. 7	7.5.2.2	Natural England notes that <i>“The geological SSSI Little Oakley Channel Deposit (Natural England, 2026) overlaps into the EOS Scoping Boundary, north-east of Little Oakley. This SSSI provides a reserve of Pleistocene interglacial channel-fill sediments, unique in Britain and is of great importance</i>	Natural England has not previously provided advice to the Applicant on this geological SSSI. Given the proximity to the Little Oakley Channel Deposit SSSI we advise that impacts during the construction phase should be scoped in. It is noted that this is the approach taken in table 7-7 of the EIA.

			<i>for Quaternary studies.”</i>	
7	V.2. 7	7.5.7.1	Natural England highlights that Defra’s MAGIC map indicates that the Hamford Water SPA overlaps the Ground Conditions and Contamination Study Area in the easternmost extent. It extends offshore and also adjacent to the Ground Conditions and Contamination Study Area south of Little Oakley. A portion of the SPA is also classified as a NNR, Ramsar site and SSSI. Two isolated areas of the Hamford Water Special Area of Conservation (SAC) are present in the easternmost extent of the Ground Conditions and Contamination Study Area Natural England notes that though referenced in the text these environmental features are not specifically mentioned in Table 7-7	Natural England advises that any impacts on these sites along with their functionally linked land and the Bathside Bay Compensation Site at Little Oakley to be fully considered within the EIA.
8	V.2.10	10.2.1.2	Natural England notes that this Section sets out the designated site classifications in a broadly hierarchical manner. We note that there is no mention of ancient woodland. Whilst this is assumed to be included within protected and/or notable habitats, this may not be reflective of its true status. Natural England welcomes	Natural England advises that the inclusion of Ancient Woodland areas and buffers are considered in this section.

			references to ancient woodland within the document and confirmation in 10.8.1.1 that the intention is to avoid ancient woodland and avoid indirect effects. Natural England also considers that Little Oakley compensation site would merit reference as this will carry an extremely high level of protection as a compensation site for impacts upon internationally important designated site.	
9	V.2.10	Table 10-2	Statutory Designated Sites for Nature Conservation Located within the Study Areas. Whilst Natural England notes that Little Oakley Compensation Site is not currently designated, as a proposed compensation site for impacts upon an internationally designated site it may be subject to a much higher level of protection by the time the application is to be determined.	Natural England advises that the Little Oakley Compensation Site would merit acknowledgement within this list perhaps under the heading "Stour and Orwell Estuaries SPA/Ramsar"
10	V.2.10	Table 10-7	Natural England notes that the cable route has been scoped out for the operational phase (within 'Elements Scoped In and Out for Onshore Biodiversity' Table 10-7).	Natural England advises that justification should be provided to support scoping out this element. Furthermore, consideration of the potential for access/maintenance in the operational phase particularly within designated site boundaries, should be demonstrated.
11	V.5.32	32.5.1.3	Natural England notes that with regards to cumulative effects the list of other projects has focused	Natural England advises that all types of development that this scheme may directly interact with cumulatively/in-combination should be included.

			on energy projects. However, we advise that there are other types of development that need to be considered, for example Bathside Bay.	

C.8 Landscape & Visual Impact Assessment

Point	Section	Para/Table/Fig Ref	Comment	Recommendations
1	V.5. 34	Table 34-1 page 1409	Natural England notes that in the Onshore Biodiversity section of the Table, not all relevant protected species have been scoped in for the potential impacts of construction, operational and decommissioning, in addition to the EOS cable route and converter station	Natural England advises that all potentially impacted protected species are scoped in for all stages of the project's life span; construction, operational and decommissioning, as well as for both the EOS cable route and converter station.
2	V.4. 21	Table 21-7, page 949-955	Natural England notes that for: EOS - Landfall, Onshore HVAC and HVDC Cable Routes and Converter Station potential impacts on landscape, seascape character, special qualities of designated landscapes, impacts on views/visual amenity, have been scoped out for all development phases. However, we do not agree with this element being scoped out at this early stage.	Natural England advises that these potential impacts on landscape and seascape should be scoped in, until more specific and detailed information is provided on the location of landfall, onshore infrastructure, and different phases of the development (including decommissioning).
3	V.4. 21	Table 21-7, page 949-955	Natural England notes that installation of the proposed HVDC subsea cabling and the subtidal UK landfall breakout point, along with its operation and decommissioning have also been scoped out.	Natural England advises that these potential impacts on landscape and seascape should be scoped in, until further information is provided on the location of the landfall and the different phases of the development.

4	V.1. 2	2.4.8, (page 75 of whole document)	Natural England notes that Five Estuaries OWF and North Falls OWF will also be connected into the National Grid's proposed substation, called East Anglia Connection Node (EACN) Substation. This substation will also form part of National Grids Norwich to Tilbury Project. Therefore, Natural England is concerned that there is the potential for in-combination/cumulative impacts between North Falls, Five Estuaries, Tarchon and Norwich – Tilbury NSIP substations. Consequently, there is a potential risk for landscape and visual impacts arising from all the projects in combination.	Natural England advises that potential in-combination/cumulative impacts across the Five Estuaries, North Falls, Tarchon and Norwich – Tilbury Projects should be scoped in, as they need to be fully considered and assessed, when more information is made available.

References

Burger C., Schubert, A., Heinänen S., Dorsch M., Kleinschmidt B., Žydelis R., Morkūnas J., Quillfeldt P. and Nehls G., (2019). A novel approach for assessing effects of ship traffic on distributions and movements of seabirds. *Journal of Environmental Management*, 251.

Carter MID, Boehme L, Cronin MA, Duck CD, Grecian WJ, Hastie GD, Jessopp M, Matthiopoulos J, McConnell BJ, Miller DL, Morris CD, Moss SEW, Thompson D, Thompson PM and Russell DJF (2022) Sympatric Seals, Satellite Tracking and Protected Areas: Habitat-Based Distribution Estimates for Conservation and Management. *Front. Mar. Sci.* 9:875869. doi: 10.3389/fmars.2022.875869

Fox, A.D., (2003). Diet and habitat use of scoters *Melanitta* in the Western Palearctic - a brief overview. *Wildfowl*, 54; 163-182

Goodship, N.M. and Furness, R.W. (MacArthur Green) (2022). Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. NatureScot Research Report 1283.

Gubbay, S. 2007. Defining and managing *Sabellaria spinulosa* reefs: Report of an inter-agency workshop 1-2 May 2007, JNCC Report No. 405, JNCC, Peterborough, ISSN 0963-8091

Jenkins, C., Eggleton, J. Albrecht, J., Barry, J., Duncan, G., Golding, N. & O'Connor, J. 2015. North Norfolk Sandbanks and Saturn Reef

cSAC/SCI management investigation report. JNCC/Cefas Partnership Report, No. 7

Kaiser, M.J., Galanidi, M., Showler, D.A., Elliott, A.J., Caldow, R.W., Rees, E.I.S., Stillman, R.A. and Sutherland, W.J., (2006). Distribution and behaviour of Common Scoter *Melanitta nigra* relative to prey resources and environmental parameters. *Ibis*, 148; 110-128.

Kyle-Henney M., Reach I., Barr N., Warner I., Lowe S., and Lloyd Jones D., 2024. Identifying and Mapping Atlantic Herring Potential Spawning Habitat: An Updated Method Statement.

National Marine Fisheries Service. (2024). Update to: Technical Guidance for assessing the effects of anthropogenic sound on marine mammal hearing (Version 3.0): Underwater and in-air criteria for onset of auditory injury and temporary threshold shifts (Draft NOAA Technical Memorandum NMFS-OPR-xx). U.S. Department of Commerce, National Oceanic and Atmospheric Administration.
<https://www.fisheries.noaa.gov/s3/2024-05/NMSFAcousticGuidance-DraftTECHMEMOGuidance-3.0-FEB-24-OPR1.pdf>

Popper, A. N., Hawkins, A. D., Fay, R. R., Mann, D. A., Bartol, S., Carlson, T. J., Coombs, S., Ellison, W. T., Gentry, R. L., Halvorsen, M. B., Løkkeborg, S., Rogers, P. H., Southall, B. L., Zeddis, D. G., and Tavalga, W. N. (2014). *ASA S3/SC1.4 TR-2014 Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report Prepared by ANSI-Accredited Standards Committee S3/SC1 and Registered with ANSI*. SpringerBriefs in Oceanography. Cham: Springer. doi:[10.1007/978-3-319-06659-2](https://doi.org/10.1007/978-3-319-06659-2).

Reach, I., Kyle-Henney, M., Barr, N., Warner, I., Lowe, S., and Lloyd Jones, D., 2024. Identifying and Mapping Sandeel Potential Supporting Habitat: An Updated Method Statement.



Proposed DCO Application by Tarchon Energy Limited for Tarchon Interconnector Project

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor Strutt & Parker/BNP Paribas Real Estate have reviewed the EIA Scoping Report dated April 2026. There are 7 operational Royal Mail properties within 10km of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network. However, at this point in time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

████████████████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

████████████████████@struttandparker.com), Strutt & Parker.

Please can you confirm receipt of this holding statement by Royal Mail.

End

Tarchon Interconnector

Statutory Scoping Consultation Response

Suffolk County Council

Table of Contents

Glossary of Acronyms.....	2
1. Introduction	3
2. SCC Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy...	3
3. Highways	4
4. Economic Development.....	5
5. Skills, Education and Employment	5
6. Cumulative Impact	7
7. Landscape	8

Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>AONB</i>	<i>Area of Outstanding Natural Beauty (locally known as National Landscapes)</i>
<i>ASEC</i>	<i>Asset Skills Enhancement and Capability</i>
<i>CTMP</i>	<i>Construction Traffic Management Plan</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DV</i>	<i>Dedham Vale</i>
<i>EACN</i>	<i>East Anglian Connection Node</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWF</i>	<i>Offshore Wind Farm</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SECH</i>	<i>Suffolk & Essex Coast & Heaths</i>

“The Council” / “SCC” refers to Suffolk County Council.

1. Introduction

- 1.1 These comments of Suffolk County Council (“SCC”) are in response to the statutory scoping consultation held by PINS in Spring 2026.
- 1.2 The project consists of a 1.4GW HVDC subsea interconnector between the UK and Germany. The project’s converter station is planned to connect at the proposed East Anglia Connection Node (“EACN”).
- 1.3 The proposed EACN and converter station are located approximately 2 kilometres south of the administrative boundary of Suffolk. SCC is therefore a Neighbouring Authority and a statutory consultee to the proposed development.
- 1.4 Tarchon has asked the Secretary of State for the Department of Energy Security and Net Zero for the interconnector to be considered a Nationally Significant Infrastructure Project (“NSIP”). Under the Planning Act 2008, NSIPs are developments which require Development Consent Orders (“DCO”) to be granted by the relevant Secretary of State.
- 1.5 As mentioned, SCC is a Neighbouring Authority to the proposed development and a statutory consultee. Since the proposed development is outside SCC’s administrative boundaries, SCC’s comments are restricted to matters relating to:
 - highways;
 - economic development;
 - skills, education and employment;
 - cumulative impact; and,
 - landscape.

2. SCC Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy

- 2.1 SCC adopted its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy in February 2026, setting out its overall stance on major projects. The policy is relevant for SCC’s position on the Tarchon Interconnector proposal, and states:
- 2.2 “Suffolk County Council recognises that significant new infrastructure is required to ensure energy security, deliver growth, transport resilience, jobs and prosperity, and adapt to the challenges of a changing climate faced by the UK, and the communities and environment of Suffolk.
- 2.3 However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately

recognised, assessed, appropriately mitigated, and, if necessary, compensated for.”¹

- 2.4 SCC will follow this approach in this response, and throughout the subsequent DCO process.
- 2.5 SCC considers it essential that an effective Planning Performance Agreement (“PPA”) is agreed with the Applicant although one is not in place at present. Its Energy and Climate Adaptive Infrastructure Policy states:
- 2.6 “The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council’s engagement with project promoters.”
- 2.7 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.²
- 2.8 SCC continues to be willing to work with the project’s promoter through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

3. Highways

- 3.1 SCC would be interested in seeing the Construction Traffic Management Plan (“CTMP”), specifically the HGV routes in case they include any of Suffolk’s local road network, for example the A137. We would also be interested in worker numbers and their impact on Suffolk’s local road network.
- 3.2 An Abnormal Indivisible Load (“AIL”) report will be required to be shared with Suffolk County Council if they will be using any of the Suffolk local road network, including those to the ports. Other projects in this area such as Five Estuaries and North Falls have used Harwich for their AIL deliveries.
- 3.3 SCC would defer to Essex County Council as the Local Highway Authority for this project.

¹ See Suffolk County Council’s Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy <https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf>

² See Suffolk County Council’s expectations for Planning Performance Agreements (PPAs) for Nationally Significant Infrastructure Projects (NSIPs) – Guidance for project promoters: <https://www.suffolk.gov.uk/asset-library/suffolk-county-county-councils-expectations-for-planning-performance-agreements-for-nsips.pdf>

4. Economic Development

- 4.1 Suffolk has recently published a new Economic Strategy³ and would wish to see any new initiative making a positive contribution to the document and the initiatives contained within it. SCC would expect to see the applicant outlining what actions and mitigations would occur and how the county economy could benefit as a consequence.
- 4.2 SCC would also be interested to see how the initiative would complement other ongoing or proposed NSIPs and how partners could work with initiatives such as the Suffolk Supply Chain⁴ to maximise the benefits for the county.
- 4.3 Suffolk works with neighbouring counties (including Essex) on a range of economic initiatives including GENERATE⁵ and Made Smarter⁶ to name but two. We would be keen to see how this initiative can make a positive contribution to projects such as these.
- 4.4 Tourism is a key sector for Suffolk and the East of England. As with other large-scale energy infrastructure projects, we would like to ensure that there are no negative impacts on this sector and to understand what mitigation may need to be put in place if necessary.

5. Skills, Education and Employment

- 5.1 SCC's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy– The Socio-economic Effects of NSIPs supplementary guidance sets out the Council's approach to the proportionate assessment of skills, education and employment effects arising from nationally significant infrastructure projects and informs the Council's expectations of Environmental Statements (ES).⁷

Baseline conditions

- 5.2 The ES should establish an appropriate socio-economic baseline relevant to skills, education and employment, proportionate to the scale and nature of the project. This should include a concise overview of the local and sub-regional labour market, existing employment levels, occupational structure and labour supply characteristics that are relevant to the project's anticipated workforce profile. The baseline should explicitly link these conditions to the likely workforce demands of the project, rather than providing a general area profile, and should identify current skills availability and any known constraints or gaps in sectors anticipated to be required during construction and operation.

³ <https://suffolkeconomy.co.uk/economic-strategy/>

⁴ <https://suffolksupplychain.co.uk/>

⁵ <https://generate-energy.co.uk>

⁶ <https://www.madesmarter.uk/adoption/in-my-region/east-of-england/>

⁷ <https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf>

- 5.3 In addition, the ES should describe the existing education and training infrastructure capable of supporting relevant skills development, including further education, higher education, independent training provision and apprenticeships. The baseline should not be limited to the reproduction of publicly available datasets but should provide a clear analytical foundation for understanding how the project may interact with, place demands on or create opportunities within the existing skills and education system, consistent with SCC's supplementary guidance.

Construction phase workforce and skills effects

- 5.4 The ES should assess the workforce and skills effects associated with the construction phase in sufficient detail to inform an understanding of potential impacts and opportunities. This should include identification of the distinct construction phases of the project, their anticipated duration, peak and ramp-up periods and the workforce numbers and skill sets required over time.
- 5.5 The assessment should clearly distinguish between different skill levels and occupational groups and identify the likely geography from which the construction workforce would be drawn. In line with SCC's adopted approach to NSIP socio-economic assessment, this should recognise that labour catchments and travel behaviour may differ significantly between specialist, skilled and less-skilled roles, and that these differences may have implications for local skills demand and availability.
- 5.6 The ES should consider the extent to which construction workforce requirements could be met by home-based labour and the potential implications where non-home-based labour is likely to be required. It should also examine potential effects on the existing labour market, including the risk of displacement of workers from other employers or projects, and identify any cumulative effects arising from concurrent NSIP or non-NSIP developments within Suffolk or the wider region, particularly where construction programmes may overlap.

Operational phase employment and skills effects

- 5.7 Where the project would give rise to a material operational workforce, the ES should assess the nature and scale of long-term employment opportunities, including the types of skills required and the extent to which these align with existing or emerging local and regional skills provision. Even where operational workforce numbers are modest, the ES should consider whether specialist roles or long-term employment may be strategically significant in skills or training terms.
- 5.8 Any requirements for specialist, ongoing or periodic training should be identified, together with the potential role of local education and training providers in supporting those needs. The ES should also consider whether operational

employment provides opportunities for longer-term skills development and legacy benefits for the local and regional workforce, particularly in relation to the energy sector and associated industries.

Mitigation, enhancement and skills delivery

- 5.9 The ES should set out proportionate measures to mitigate adverse skills and employment effects and to maximise positive outcomes where appropriate. This should include an assessment of potential skills and employment planning approaches, governance arrangements and engagement with SCC's Regional Skills Coordination Function, in line with the Council's adopted socio-economic policy framework for NSIPs.
- 5.10 Where relevant, the ES should explain how the project could support apprenticeships, training pathways and inclusive access to employment opportunities, and how contractors and supply chains may engage with local education and training providers. These matters should be presented as assessment considerations rather than delivery commitments at scoping stage. The ES should also outline proportionate arrangements for monitoring and reporting workforce and skills outcomes over the life of the project, recognising that employment impacts represent opportunities and risks rather than guaranteed benefits.

Cumulative and strategic considerations

- 5.11 The ES should consider cumulative skills, education and employment effects arising from the project in combination with other major developments. This is particularly important where overlapping construction programmes could place pressure on the availability of skilled labour, training capacity or local delivery partners, matters explicitly addressed through SCC's supplementary guidance on the socio-economic effects of NSIPs.
- 5.12 Conversely, the ES should also identify opportunities for coordination with other developments to support shared skills pipelines, supply-chain capacity and longer-term economic and workforce benefits for Suffolk and the wider region. This cumulative assessment should be proportionate but sufficiently robust to inform related assessments, including those concerning transport, accommodation and local services, which rely on a clear understanding of workforce numbers, skills profiles and the timing of demand.

6. Cumulative Impact

- 6.1 This part of East Anglia and hinterland is now hosting an unprecedented cluster of NSIPs. Tarchon must provide clarity on how its employment, supply chain, housing, and service pressures will interact with and compound those from nearby NSIPs.

- 6.2 Without strategic coordination between promoters, there is a real risk of over-saturating the regional workforce, skills displacement, reducing quality of service delivery, and undermining the social license to operate for all NSIPs concerned.

7. Landscape

As stated in SCC comments for the Non-Statutory Consultation (slightly updated)

- 7.1 Whilst the onshore works are proposed to be located in Essex, there is still potential for the project to impact Suffolk.
- 7.2 There is a risk that the project would have significant adverse effects on the Dedham Vale (“DV”) and Suffolk and Essex Coast and Heaths (“SECH”) Areas of Outstanding Natural Beauty (“AONB”) and potentially undermine the purposes of the designation of the designated landscapes. The scoping area for the converter station site is located approximately 550m north of the DVAONB and 600m north of the SECHAONB. SCC recognises that this is primarily a matter for Natural England, who are required to advise any future examination, and ultimately the Secretary of State, on the impacts of this project on the AONBs and the purposes of its designation. Nonetheless, SCC also has its own responsibilities in relation to the AONBs by virtue of the strengthened duties imposed by the Countryside and Rights of Way Act 2000.
- 7.3 At this stage, there is still not sufficient information about the location and design of the onshore infrastructure to conclude that it would not give rise to significant effects on designated landscapes (Suffolk and Essex Coast and Heaths AONB and Dedham Vale AONB) and SCC considers that this should be assessed as part of the Environmental Statement.
- 7.4 The Council further considers that Hedgerow as well as Arboricultural surveys should also be included for both the converter station site and the cable corridor.
- 7.5 Given the impacts of onshore infrastructure on the AONBs remain in scope, it is suggested that the applicant will also have to consider this matter in relation to cumulative impacts with other proposed onshore infrastructure, such as Five Estuaries, North Falls, and Norwich to Tilbury.
- 7.6 SCC considers that it would be reasonable and necessary for the Applicant to engage formally with both the relevant local authorities in Suffolk, and the communities they represent, to fully explain the likely effects and to outline proposed schemes of mitigation and compensation, for what appear to be potentially significant adverse effects on the Dedham Vale and Suffolk and Essex Coast and Heaths AONBs within Suffolk.

Additional comments

Figure 21-3 County Landscape Character

- 7.7 The Suffolk Landscape Character Assessment (2008) does not describe Landscape Character Areas, but landscape character types (as correctly stated in paragraph 21.5.1.11). The areas identified on Figure 21-3 County Landscape Character would therefore need to be examined within the landscape baseline assessment, in how far they are coherent with the type and where they are distinct from the type to identify their susceptibility to the scheme.

Figure 21-4 Visual Receptors and Viewpoints

- 7.8 SCC is concerned about the remaining uncertainties with regards to location of the converter station site, as the location will greatly influence the visual effects on Suffolk and the Dedham Vale and Suffolk & Coast National Landscapes.
- 7.9 It is welcome that there are currently 4 viewpoints from within the National Landscapes. Two of these are within Suffolk.
- 7.10 Viewpoint 10: This location appears to be located at a PRoW (turning south from the A137), which is quite well vegetated and may not offer open views towards the converter station site. The location for this viewpoint will need to be fine-tuned, once the ZTVs are available.
- 7.11 Viewpoint 19: The location, where the PRoW leaves the road towards the south-west and open views can be experienced, appears to be a good location, subject to further information such as ZTVs.
- 7.12 SCC considers that additional viewpoints from Suffolk may be required, when the location of the converter station is confirmed and ZTVs will be available to inform the required viewpoint locations.
- 7.13 It would have been a good approach to test the visual influence of alternative converter station sites on the National Landscapes through ZTVs as part of the site selection process.
- 7.14 SCC welcomes that the final list of viewpoints will be agreed with stakeholders and considers itself to be one of them (note: there was no response to SCC's comments to the Non-Statutory consultation in Table 21-1 Non-Statutory Consultation Responses - Landscape and Visual Amenity).
- 7.15 SCC would welcome to be also consulted on the rationale for visualisation types. SCC considers it likely that photo montages or wirelines will be required for viewpoints from the sensitive locations within the National Landscapes.
- 7.16 Nighttime effects should also be demonstrated through photomontages.

Significance threshold

- 7.17 SCC considers that the significance threshold needs to be lowered and include all moderate effects, with professional judgements discerning whether moderate-minor effects are significant or not. Especially as the thresholds for sensitivity are quite high as well.
- 7.18 This is supported by GLVIA3 clarification note 3(5), which states that ‘typically, effects falling below the middle of the range of overall effect are assessed as not significant’. With the matrix proposed this would be below medium sensitivity and medium impact.
- 7.19 SCC also considers that truly negligible effects would be negligible regardless of the sensitivity of the receptor.
- 7.20 I have offered these comments without prejudice to any comments I or any other SCC Officer may wish to make at a later date, when additional information becomes available.



Planning Services
Town Hall
Station Road
Clacton on Sea
Essex CO15 1SE

FAO [REDACTED]
Senior Environmental Advisor
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o Quadient
69 Buckingham Avenue
Slough
SL1 4PN

Please Ask For: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@tendringdc.gov.uk

Our Ref: 26/00567/EIASCO

Via email at: tarchoninterconnector@planninginspect
orate.gov.uk

06 May 2026

Dear [REDACTED]

YOUR REFERENCE:	EN0210009
OUR REFERENCE:	26/00567/EIASCO
ADDRESS:	Tarchon Interconnector Project.
PROPOSAL:	EIA Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany a future Development Consent Order application.

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Tarchon Energy Limited (the applicant) for an Order granting Development Consent for the Tarchon Interconnector Project (the proposed development)

Scoping Opinion by Tarchon Energy Ltd - Tendring District Council (TDC) response

Introduction and Context

Tendring District Council (TDC) welcomes the opportunity to respond to the request by Tarchon Energy Limited for a Scoping Opinion in respect of the proposed Tarchon Interconnector Project.

The Council is a host authority for a high concentration of Nationally Significant Infrastructure Projects (NSIPs), including the Norwich to Tilbury NSIP, North Falls Offshore Windfarm, and Five Estuaries Offshore Windfarm. Many other NSIP projects, specifically those concentrated in southern parts of Suffolk such as Bramford to Twinstead and Sea Link, also have direct as well as indirect impacts on TDC. All these projects, but specifically the ones concentrated in TDC, have been, and continue to be, highly contentious, and have generated substantial and ongoing impacts on

Tendring's communities, landscapes, economy and environment. This EIA Scoping Request response should be read in conjunction with Essex County Council's (ECC) response to the same.

TDC's response to this Scoping Request, will, amongst other things reinforce the need for:

- Comprehensive, precautionary and realistic scoping at an early stage;
- Full recognition of wide-ranging cumulative and in-combination effects, including temporal overlap;
- Avoidance of the persistent under-scoping of impacts that are likely to prove controversial at Examination.

The proposed Tarchon Interconnector would represent a further major infrastructure proposal within the Tendring Peninsula, compounding an already intense NSIP burden. This context must be absolutely central to the scope, methodology and assumptions adopted in the Environmental Impact Assessment (EIA) and Environmental Statement (ES).

Overall Approach to Scoping

TDC:

- Supports the inclusion of all topic areas proposed by the Applicant to be scoped into the EIA; and
- Strongly requires that Tourism is scoped into the ES as a freestanding assessment topic, rather than being subsumed within a generic socio-economic chapter.

The Council does not support the scoping out of any topic where there is a reasonable likelihood of significant effects, particularly given the scale of construction, the sensitivity of receptors, and the likelihood of cumulative impacts with other NSIPs.

Landfall Location and Internationally Designated Sites – Hamford Water

TDC raises serious concern regarding the proposed landfall location to the south of Harwich which includes Hamford Water. TDC's experience in dealing with numerous NSIPs, both within the district and across the East Anglia region, strongly indicates that this matter—alongside others set out herein—will be of key importance. Hamford Water is internationally and nationally designated as:

- Ramsar Site
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- National Nature Reserve (NNR) (list not exhaustive)

These designations engage the most stringent protections under UK and international environmental law.

The applicant is strongly advised to have full regard to the relevant suite of policies, legislation and all other relevant guidance, and ensure full compliance, including (but not limited to) section 104 of the Planning Act 2008, National Policy Statements (for Energy) – in particular Policies EN-1 (Overarching National Policy Statement for Energy) and EN-5 (Electricity Networks Infrastructure). Also of relevance is the Conservation of Habitats and Species Regulations 2017, which states that development may only proceed where:

1. No feasible alternatives exist that would avoid adverse effects on site integrity;

2. There are Imperative Reasons of Overriding Public Interest (IROPI); and
3. Full, timely and effective compensatory measures are secured in full to ensure the coherence of the protected site network.

This represents an extremely high legal and policy bar with considerable implications for EIA Scoping and indeed for a DCO submission of this nature.

The EIA must therefore (as a minimum):

- Assess alternative landfall locations and cable routes at a genuinely strategic level, including those that would avoid Hamford Water entirely;
- Provide a clear and transparent justification for the selection of the proposed landfall location;
- Fully assess direct, indirect, disturbance-related and in-combination effects on Hamford Water and all associated functionally linked land, which in such a sensitive area can stretch for considerable distances in all directions;
- Fully and robustly examine project related impacts and in combination impacts during construction, operation, reinstatement and maintenance phases;
- Identify, at scoping stage, the likely requirement for compensatory habitat, should avoidance and mitigation be insufficient.

TDC stresses that avoidance is the primary requirement, not mitigation by default. The Scoping Opinion should reflect this clear policy hierarchy.

Landscape and National Landscape Impacts

Landscape and visual effects will be among the most sensitive and contentious issues associated with this project.

The EIA must fully assess impacts on (list not exhaustive):

- The Dedham Vale National Landscape (formerly AONB);
- Suffolk and Essex Coasts and Heaths National Landscape;
- The wider rural, coastal and estuarine landscapes of the Tendring Peninsula, including all areas of special landscape character that will be impacted upon;
- Tranquillity, dark skies and perceptual character.

The landscape assessment should:

- Address construction, operational and post-reinstatement scenarios;
- Explicitly consider the duration and reversibility of impacts;
- Include a robust cumulative and in-combination assessment, particularly with:
 - Norwich to Tilbury NSIP;
 - North Falls Offshore Windfarm;
 - Five Estuaries Offshore Windfarm;
 - Any associated onshore infrastructure proposals in the wider area.

Tourism – Requirement for a Standalone EIA Topic

Tourism is of critical strategic importance to Tendring District. The Council is concerned about what will be a further significant and potentially very harmful impact on Tendring's tourism offer, and therefore this topic must be explicitly scoped into the EIA as a standalone topic.

Tendring's economy is heavily reliant on:

- Coastal tourism;
- Nature-based tourism associated with Hamford Water and other designated sites;
- Recreational use of beaches, promenades, public rights of way and coastal paths.

The EIA must assess:

- Impacts on visitor numbers, experience and perception;
- Effects arising from prolonged construction activity, noise, traffic and visual intrusion;
- Loss or restriction of access to recreational assets and PROWs;
- In-combination tourism impacts where multiple NSIPs affect the district concurrently or sequentially.

TDC is clear that these impacts cannot be adequately captured solely through a generic socio-economic assessment.

Highways, Transport and Construction Effects

Based on TDC's experience of other NSIPs, highways and transport impacts are frequently underestimated at scoping stage.

The EIA must (list not exhaustive):

- Reflect the worst-case construction scenario;
- Assess impacts on rural roads, settlements, safety, severance and amenity;
- Include cumulative impacts with other NSIP construction traffic;
- Address abnormal loads and construction compounds.
- Fully mitigate adverse impacts and damage to roads caused by the significant increase in traffic associated with a project of this scale and nature.

Biodiversity, Trees and Green Infrastructure

As a minimum the EIA must comprehensively consider:

- Loss of trees, hedgerows and mature landscape features;
- Habitat fragmentation across the onshore cable corridor;
- Impacts on designated and non-designated biodiversity assets;
- Effectiveness and realism of reinstatement proposals and mitigation.

Mitigation and compensation measures must be deliverable, secured, and evidence-based.

Noise, Vibration, Health and Wellbeing

The EIA should fully assess impacts on (list not exhaustive):

- Noise and vibration during construction and operation;
- Provide a robust and evidence-led assessment of human health and wellbeing impacts, including stress and disturbance, and avoid any persistent or unjustified downplaying of likely effects;
- Vulnerable and sensitive receptors;
- Cumulative exposure to multiple NSIPs over time.

Residential Amenity, PROWs and Access

A full and detailed assessment is required of:

- Impacts on residential amenity, including outlook, tranquillity and enjoyment of property;
- Temporary and permanent loss or diversion of Public Rights of Way and footpaths;
- Effects on informal recreation and accessibility;
- Impacts of noise, vibration, deterioration of air quality and many other factors, on residential amenity.

Cumulative and In-Combination Effects, including the implications of the proposal for future growth proposals within Tendring District and the wider region. This should include explicit consideration of the regional growth strategy and the delivery of strategic and other relevant site allocations identified within Tendring District Council's emerging Local Plan to 2042/43.

Tendring District Council expects a robust, realistic and transparent cumulative assessment that fully takes account of:

- Spatial overlap of projects and associated impact corridors;
- Temporal coincidence and overlap of construction phases;
- Repeated and sustained impacts on the same communities, environments and sensitive receptors;
- The potential effects of the proposal on the delivery, viability and timing of future growth strategies and planned development at both the local and regional level.

Given the advanced stages of several relevant Nationally Significant Infrastructure Projects, together with the progression of TDC's emerging Local Plan to 2042/43, there is no justification for a limited, high-level or overly precautionary cumulative assessment. The ES must instead be grounded in realistic assumptions and available evidence to ensure that cumulative and in-combination effects are properly and transparently assessed.

In particular, in reviewing the scope of the EIA Scoping Report, the Council considers it essential that the cumulative effects assessment fully reflects the scale, sensitivity, and intensity of existing, approved, committed and emerging development within and adjacent to the (English) onshore scheme scoping boundary, including the cable route, landfall locations, converter station, construction compounds and associated access corridors.

The cumulative effects assessment should not be limited to, or be subject an overly narrow focus on other nationally significant infrastructure projects in the region, or other renewable schemes in this or neighbouring districts/counties, but must also include **major commercial, residential, port-related, ecological compensation and strategic growth developments** where there is potential for interaction, overlap or combined effects, whether spatially or temporally. This is particularly important in the Tendring context, where multiple large-scale projects (and linked projects/compensation schemes) are either operational, consented, under construction or actively planned in sensitive coastal, estuarine and rural locations.

Approved and Committed Development (list not exhaustive)

The Council considers the following **approved and committed developments** to be of particular relevance to the cumulative effects assessment, noting their proximity to the proposed onshore cable corridor, landfall areas, coastal environment and key transport routes:

- **Bathside Bay Development, Harwich**
Granted planning permission under reference 10/00202/FUL (14 February 2013), as varied by permission 21/01810/VOC, comprising a major port-related commercial development with extensive land use, transport, marine and ecological implications.
- **Green Energy Hub, Harwich**
Granted planning permission under reference 23/01594/FUL, comprising energy-related infrastructure and industrial development within the Harwich area, with clear potential for cumulative effects in relation to construction traffic, landscape, noise, air quality and effects on heritage and coastal receptors.
- **Habitat Creation and Compensation Sites at Little Oakley**
Relevant TDC planning approval reference number: 21/02144/FUL - To be delivered as part of the Bathside Bay mitigation strategy, comprising internationally and nationally important habitat creation areas. These sites are considered particularly sensitive to cumulative effects arising from construction activity, hydrological change, disturbance and indirect ecological pathways associated with linear infrastructure such as cabling works, and because the Bathside Bay Habitat Creation and Compensation scheme is within the Tarchon (English) Onshore Scheme Scoping Boundary.

These developments are already contributing to cumulative environmental change within Tendring and must be assessed alongside the proposed interconnector works to understand combined and incremental effects.

Emerging Allocations and Draft Strategic Policies (list not exhaustive)

In addition, the Council considers it necessary that the cumulative effects assessment has regard to draft and emerging allocations set out in the Tendring District Local Plan Review (latest version is the Regulation 18 Preferred Options), and where these fall within or adjacent to the Tarchon onshore scheme scoping boundary, or where they are functionally linked through shared infrastructure or environmental receptors. While these allocations do not yet carry full development plan weight, their scale and strategic nature mean they are highly relevant to cumulative assessment.

In particular, this should include, but not be limited to:

- **Draft Strategic Policy SAMU5 – Development off Dean’s Lane and Oakley Road (Dovercourt)**
Representing further large-scale residential growth in proximity to proposed coastal and onshore infrastructure corridors.
- **Draft Strategic Policy SAMU9 – Horsley Cross Garden Village**
A proposed new settlement of strategic scale, with significant long-term implications for land use, traffic generation, landscape, ecology and infrastructure provision, including potential interactions with onshore construction corridors and wider transport networks.
- **Draft Strategic Policy SAMU8 – Hare Green Garden Village**
Another proposed new settlement of strategic scale, with significant long-term implications for land use, traffic generation, landscape, ecology and infrastructure provision, including potential interactions with onshore construction corridors and wider transport networks.

Other draft (housing) allocations in settlements such as Great Oakley, Wix, Wrabness, Bradfield and Little Bromley should also be factored in because these sites are located either within or adjacent to the Tarchon onshore scoping boundary, and likely to give rise to cumulative effects in relation to construction activity, habitat connectivity, agricultural land use and infrastructure demand.

The Council also notes that these allocations, if progressed, would be delivered over extended timescales and may overlap with different phases of the interconnector's construction and operation. The cumulative effects assessment should therefore consider reasonable worst-case temporal overlap scenarios, particularly where sensitive environmental receptors or constrained infrastructure are involved.

The Council wishes to emphasise again that the list of developments set out above is not exhaustive, and the applicant should ensure that the cumulative effects assessment captures all other relevant approved, committed and reasonably foreseeable development within the study area, drawing on the Council's planning records and the emerging Local Plan evidence base.

Ultimately the cumulative assessment should be proportionate but sufficiently robust to enable the Examining Authority to clearly understand:

- the combined and interactive effects of the interconnector alongside other major development;
- whether impacts that may be individually acceptable could become significant when considered cumulatively; and
- how mitigation measures have been designed to respond to the real development context in Tendring, rather than the interconnector being assessed in relative isolation.

Heritage

See ECC's response.

Conclusion

TDC considers that the proposed Tarchon Interconnector raises issues of significant local, regional and much wider sensitivity, particularly in relation to:

- Internationally designated habitats at Hamford Water;
- Landscape and National Landscape impacts;
- Tourism and the visitor economy;
- Cumulative NSIP burden;
- Community, health and amenity effects.
- Biodiversity, geodiversity and heritage

The Council therefore urges the Scoping Authority to ensure that:

- All issues identified above are fully scoped into the EIA;
- A precautionary approach consistent with national policy and legislation is applied;
- The exceptionally high policy and legal tests applicable to this project are clearly reflected in the Scoping Opinion.

Yours faithfully

PLANNING SERVICES

From: [REDACTED]@trinityhouse.co.uk>
Sent: 06 May 2026 13:26
To: Tarchon Interconnector <tarchoninterconnector@planninginspectorate.gov.uk>
Cc: [REDACTED]@trinityhouse.co.uk>
Subject: RE: EN0210009 - Tarchon Interconnector Project - EIA Scoping and Consultation and Regulation 11 Notification

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

Good afternoon [REDACTED],

I can confirm that Trinity House is content with the Scoping Report and have no further comments to make.

Kind regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED]@trinityhouse.co.uk | [REDACTED] & [REDACTED]

www.trinityhouse.co.uk



TRINITY HOUSE



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0210009
Our Ref 94858 CIRIS

██████████
Senior Environmental Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough, SL1 4PN

5th May 2026

Dear ██████████,

Nationally Significant Infrastructure Project National Grid – Tarchon Interconnector Project (PINS Ref: EN0210009) Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electromagnetic Fields

It is noted that EMFs have been scoped out on the basis that onshore HVAC cables will not go beneath residential properties (including gardens), commercial premises (excluding farmland) or other buildings. For clarity, it is recommended that the applicant specify the nominal voltage of the onshore HVAC cables and their distance to the nearest residential property.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>