



SCOPING OPINION:

Proposed Eastern Green Link 5

Case Reference: EN0210010

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

13 October 2025

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1. INTRODUCTION

1.1.1 On 02 September 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Electricity Transmission plc (NGET) (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Eastern Green Link 5 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'.

1.1.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

<http://infrastructure.planninginspectorate.gov.uk/document/EN0210010/documents>

1.1.3 It is provided in the following parts:

Volume 1 Main Text

[EN0210010-000028-EN0210010 Scoping Report Volume 1 Main Text.pdf](#)

Volume 2 Appendices

[EN0210010-000029-EN0210010 Scoping Report Volume 2 Appendices.pdf](#)

Volume 3 Figures Part 1

[EN0210010-000030-EN0210010 Scoping Report Volume 3 Figures Part 1.pdf](#)

Volume 3 Figures Part 2

[EN0210010-000031-EN0210010 Scoping Report Volume 3 Figures Part 2.pdf](#)

Volume 3 Figures Part 3

[EN0210010-000032-EN0210010 Scoping Report Volume 3 Figures Part 3.pdf](#)

Volume 3 Figures Part 4

[EN0210010-000033-EN0210010 Scoping Report Volume 3 Figures Part 4.pdf](#)

Volume 3 Figures Part 5

[EN0210010-000034-EN0210010 Scoping Report Volume 3 Figures Part 5.pdf](#)

Volume 3 Figures Part 6

[EN0210010-000035-EN0210010 Scoping Report Volume 3 Figures Part 6.pdf](#)

- 1.1.4 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.
- 1.1.5 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.
- 1.1.6 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.
- 1.1.7 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.
- 1.1.8 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'](#)
- 1.1.9 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

2.1 Description of the Proposed Development

(Scoping Report Sections 1, 3 and 4)

ID	Ref	Description	Inspectorate's comments
211	Paras 1.4.5 and 4.2.1	Terminology	The Scoping Report states that Eastern Green Link (EGL) 5 comprises a 2 gigawatt (GW) high voltage direct current (HVDC) system linking the Scottish coastline and Lincolnshire in England but does not make it clear how this is related to the voltage terminology used throughout the Scoping Report. The ES should provide a clear description of the technical terminology used.
212	Para 1.4.20	Abnormal indivisible loads (AIL)	The ES should confirm the predicted number of AIL movements and the type and routeing of vehicles carrying AIL, which has been used as the basis for assessment. The ES should also consider the use of existing rail and river connections in the assessment of alternatives.
213	Para 1.5.6	Cable installation	The Scoping Report states that in accordance with the United Nations Convention on the Laws of the Sea (UNCLOS) and s81 of the marine and Coastal Access Act 2009 (MCAA) cable installation beyond 12 nautical miles (NM) is exempt from requiring a marine licence and that the deemed marine licence (DML) within the development consent order (DCO) would be structured to reflect licensable activities within and outside of 12 NM. Regardless of the consenting strategy, the ES should assess any likely significant effects arising from the installation of the cable, including cumulative effects as relevant.
214	Chapter 3	Reasonable alternatives	The Scoping Report describes the applicant's options' appraisal, including strategic options for the marine route alignment to Scottish waters. The EIA Regulations require an applicant to provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental

ID	Ref	Description	Inspectorate's comments
			effects'. The Inspectorate acknowledges the applicant's intention to provide a detailed description of siting and routeing options appraisal process in the ES as stated in Chapter of the Scoping Report. The Inspectorate would expect the ES to provide details of the reasonable alternatives studied and the reasoning for selection of the chosen option(s), including a comparison of the environmental effects. Technical studies or feasibility work produced to support the appraisal process should be summarised or appended to the ES.
215	Para 3.9.30	Optionality	The Scoping Report describes emerging preferences for several infrastructure components, including 2 siting zones for the proposed converter station, corridors for onshore cables, and 2 marine route alignments for offshore cable. The converter station siting zones (CS05 and CS06) as shown on Figure 3-4 include a large extent of land. The applicant should make every attempt to narrow the range of options, and to refine the siting location within areas of search 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 considered 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.
216	Section 3.10 and paras 4.3.47 and 4.3.63 to 4.3.68	Onshore cable installation methods and crossings	A range of potential methods for onshore cable installation are identified, including open cut trenching or trenchless crossings, such as horizontal directional drilling (HDD) or microtunnelling. It states that trenchless methods would be used where required for environmental or infrastructure features such as main rivers. The ES should identify the cable installation method, location and type of crossings within the onshore cable corridor, as well as the nature of any associated construction works (for example dewatering, trenching and HDD). The ES should assess the likely significant effects from accidental release of drilling fluids, where HDD methods are proposed. The ES should describe any likely significant effects arising from these activities. Where

ID	Ref	Description	Inspectorate's comments
			reliance is placed on the use of a specific method to mitigate significant effects, the applicant should demonstrate that the method is feasible, through assessment based on robust baseline data, and that such commitments are appropriately defined and secured. A drilling fluid management plan should form part of the outline construction environmental management plan (CEMP). The applicant should seek to agree the depths of trenchless crossings below watercourses with the relevant consultation bodies, including the Environment Agency (EA) and Internal Drainage Boards (IDBs), as appropriate.
21.7	Paras 4.3.29 to 4.3.33	Anderby Creek landfall	It is proposed that cable installation at landfall would be trenchless where possible to avoid direct impacts to the intertidal area. The applicant's attention is drawn to NE's comments (Appendix 2 of this Opinion) regarding the geotechnical information required to evidence the technical viability of HDD. The Inspectorate advises that the minimum level of information identified by NE must be set out in the ES if this method is relied upon as a mitigation measure. This includes ground investigation and baseline habitat surveys of the coastal habitat. The ES should confirm the method selected, or where options remain, set out the worst-case parameters for each option and assess the potential environmental effects. These include effects arising from accidental release of drilling fluids where HDD is selected, and from other construction activities such as dewatering and trenching. It should also assess significant effects associated with any anticipated changes at the coastal landfall site throughout the lifetime of the proposed development, such as vertical change in beach profile and coastal retreat. The ES should describe how cable burial and siting of associated infrastructure would be managed throughout the lifespan of the proposed development. Any requirement for open pits and use of heavy plant on the beach, which could affect coastal geomorphology and ecology should be identified.
21.8	Sections 4.3 and 4.4	Flexibility	The Inspectorate notes the intention to apply a 'Rochdale Envelope' approach to the onshore and offshore schemes. This is employed when there is a need to seek flexibility to address uncertainty. The applicant should make every attempt to narrow the range of options including for onshore cable routeing (noting that there are several references to 'careful routeing' being a possibility to avoid environmental receptors) and the width of the offshore cable corridor, including at landfall. The ES should clearly explain which elements of the proposed development have yet to be finalised and provide the reasons. The

ID	Ref	Description	Inspectorate's comments
			Inspectorate advises that flexibility in design should only be sought where necessary, in the interests of a proportionate ES based on the most realistic and refined design envelope possible. The ES should assess the worst case that could potentially be built out in accordance with the authorised development of the DCO being applied for.
21.9	Paras 4.3.6, and 4.3.69 to 4.3.74, and Tables 4-3 and 4-4	Temporary construction compounds	The Scoping Report describes the need for several temporary construction compounds, including along the cable installation route, but states that locations are not yet known although these would be within the scoping boundary. Approximate footprints are provided. The ES should describe the proposed number, location and dimensions 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 installation and use of the compounds.
21.10	Paras 4.3.42 and 4.3.58	Permanent easements for onshore cables	The ES should confirm the width of easements required for the onshore HVDC and HVAC cable, or the worst-case parameters if this is still to be determined. Assessment in the ES should be based on the full land extent required including permanent easements for operational maintenance.
21.11	Paras 4.3.17, and 4.3.75 to 4.3.76	Construction access routes	The Scoping Report states that temporary access roads and alterations to existing accesses from the public highway will be required. This includes a proposed Alford bypass construction traffic route to accommodate AIL being delivered to Anderby Creek. Temporary watercourse crossings (including culverts and bridges) may also be needed. 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 and type of traffic movements. Where details are unknown, a worst-case scenario should be presented. Where crossing of watercourses and culverts are required, these should be discussed with the EA and evidence of agreement or otherwise to the proposal provided in the ES. The ES should confirm if the Alford bypass is required only for construction or on a permanent basis and assess any likely significant effects accordingly.

ID	Ref	Description	Inspectorate's comments
21.12	Paras 4.3.79 to 4.3.80	Onshore component lifespan	The Scoping Report states that the minimum design life of elements of the onshore scheme is 40 years but there are no specific plans to decommission as it would be subject to maintenance, reinforcement and asset replacement with an unspecified end date. The ES should be clear as to the lifespan of different components of the onshore scheme, and how this has been considered as part of the assessment of likely significant effects arising from asset maintenance and replacement.
21.13	Para 4.4.1	Intertidal area	The onshore and offshore scheme overlap in the intertidal zone between mean low water springs (MLWS) and mean high water springs (MHWS). The ES should review the spatial areas considered in each relevant aspect chapter so it is clear what activities fall within each defined area and that these terms are used consistently across the ES. Where aspect assessments cross between 'offshore' and 'onshore' areas, it should be clear where the assessment of effects for the intertidal area can be found to avoid gaps in the assessment. This should be supported by figures at an appropriate scale.
21.14	Table 4-6	Unexploded ordnance (UXO) – offshore scheme	The Inspectorate notes the intention to seek consent for UXO clearance (if required) through a future marine licence application, and that the effects of UXO clearance would be considered at a high level in the ES for the proposed development. The Inspectorate is content with this approach, which should be based on the worst case in terms of UXO parameters (numbers and weight) and method for clearance. The ES should also address any cumulative effects from the construction of the proposed development and UXO clearance. The findings of the initial UXO desk-based assessment should be reported in the ES. The ES should describe mitigation that would be available to address any significant adverse effects, and how this would follow the mitigation hierarchy.
21.15	Table 4-6	Seabed preparation	The Scoping Report provides a high-level description of the activities likely to be required to prepare the seabed for cable laying. The ES should confirm and assess the maximum design scenario or worst-case parameters for each activity, including the locations, methods to be used, predicted volumes of materials and proposed disposal routes or locations. The need for dredging, quantities of material and likely disposal location should be identified and likely significant effects assessed in the ES.

ID	Ref	Description	Inspectorate's comments
21.16	Paras 4.4.20 and 4.4.28	Backfill of trenchless installations and other trenching activity	The Scoping Report states that the 'punch out' points for the HDD ducts and cable trench may be left to naturally backfill or be manually infilled with excavated material. The ES should assess any likely significant effects arising from these different approaches. The applicant's attention is drawn to NE's comments (Appendix 2 of this Opinion) regarding the need for exit pit locations to avoid the sunken forest present in the area, and the likely requirement for cable protection at exit pit locations due to the dynamic nature of the coastline. The ES should explain how these matters have been addressed.
21.17	Para 4.4.25	Preliminary cable burial risk assessment (CBRA)	The Inspectorate welcomes the commitment to prepare a preliminary CBRA to inform the ES and advises that this should be submitted with the DCO application. The ES should be clear on the range of burial depths that have been considered as part of the preliminary CBRA and explain the effectiveness and degree of confidence that can be placed on this in the absence of the final version.
21.18	Para 4.4.30	Separation distance from EGL3 and EGL4 offshore cables	The Scoping Report states that the subsea HVDC cables would run in parallel with another offshore HVDC cable project proposed by NGET, EGL3 and EGL4. It states that a minimum horizontal separation of 50m would be required between the proposed development and the EGL3 and EGL4 cable corridors unless constrained by pinch points. The ES should confirm the minimum separation distance for the full length of offshore cable running parallel to EGL3 and EGL4 and explain why this distance is required and could not be further reduced, where it could result in significant adverse effects.
21.19	Paras 4.4.33 to 4.4.37	External cable protection	The ES should set out the burial hierarchy that would be implemented to avoid, prevent or reduce the need for external cable protection, and confirm how this would be secured. It should confirm the maximum design scenario (MDS) or worst-case parameters for external cable protection, including the location and maximum length, area and volume, and these parameters should be demonstrably secured. The parameters of any cable protection required in or adjacent to the Holderness Marine Conservation Zone (MCZ) should be confirmed. This should be provided for the construction (installation of cable) phase and for repair and replacement during operation. Assumptions made in determining the MDS should be clearly explained. The ES should assess the likely significant effects arising from

ID	Ref	Description	Inspectorate's comments
			placement of cable protection. It should explain the environmental effects arising from the different cable protection methods proposed, including any implications for decommissioning, and identify mitigation, for example by discounting methods, where these would result in significant adverse effects. The applicant's attention is drawn to Joint Nature Conservation Committee's (JNCC) comments (Appendix 2 of this Opinion) regarding potential future prohibition of bottom towed gear in the MCZ, which could minimise the need for rock protection. The ES should confirm if such a prohibition has been implemented and how that has informed determination of the maximum cable protection parameters proposed.
2120	Para 4.4.56	Offshore component lifespan	The Scoping Report states that the minimum design life of the subsea cables is 40 years although with repairs some systems can last upwards of 60 years. It states that the scheme would be licensed for 40 years, after which it would require an extension to the DML or be decommissioned. The ES should be clear as to the lifespan of different components of the offshore scheme, and how this has been considered as part of the assessment of likely significant effects arising from asset maintenance and repair.
2121	N/A	Cumulative effects between the schemes	The Scoping Report details (section 1.4) that the whole EGL5 development comprises 4 schemes (English offshore and onshore, Scottish onshore and offshore). Where the ES assesses cumulative effects, it should consider the potential for these projects to be developed sequentially or concurrently and the potential for this to result in differing cumulative effects dependent on the construction order. The ES should set out what measures are proposed to coordinate construction activity (if any) to minimise disruption and avoid, prevent or reduce significant adverse cumulative effects.
2122	N/A	Management plans	The Scoping Report refers to various management plans that would be implemented to manage and mitigate effects, for example a CEMP, construction traffic management plan (CTMP) and waste management plan (offshore). The Inspectorate advises that outline versions of management plans should be submitted with the ES and it should be clear how these would be secured through the dDCO or other legal mechanism. In addition, an outline marine mammal management protocol should be submitted to set out how effects to marine mammals from geophysical and seismic surveys along the offshore cable route

ID	Ref	Description	Inspectorate's comments
			would be mitigated. An outline plan(s) setting out environmental management measures during operation should also be submitted, which should include ongoing management of landscape and ecological mitigation.
2123	N/A	Tentative East Coast Flyway World Heritage Site (WHS)	The applicant's attention is drawn to NE's comments (Appendix 2 of this Opinion) regarding the location of the proposed development in the tentative East Coast Flyway WHS. The ES should set out the status of this potential receptor at the point of DCO application. Where significant effects are likely to occur to the receptor beyond those assessed for the individual international and national nature conservation site designations, the ES should provide an assessment and identify mitigation as needed.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 5)

ID	Ref	Description	Inspectorate's comments
221	Para 5.3.2	Use of differing worst-case scenarios between aspect chapters	Paragraph 5.3.2 of the Scoping Report states that the reasonable worst-case scenario for any given design parameter may vary by technical aspect, depending on how that parameter may interact with the receptors being considered. The ES should provide details in each chapter of the worst-case parameters relevant to that aspect chapter and provide a justification for why that represents the worst case for that chapter.
222	Paras 5.4.11, 5.4.16 to 5.4.19 and table 5-1	Decommissioning of onshore components	The Scoping Report states that if extension of operational life is not possible, it is assumed that the proposed development would be removed with the process being like construction but in reverse. Paragraph 5.4.11 states that a high-level decommissioning assessment would be provided in the ES, with a full assessment at the time of decommissioning, in line with applicable regulations and guidance. However, later paragraphs state that decommissioning effects from the onshore scheme, including landfall, are proposed to be scoped out as the anticipated impacts would be no greater than for construction. Based on the information presented in the Scoping Report, the Inspectorate agrees that a full decommissioning assessment can be scoped out at this stage but advises that future detailed assessment of decommissioning phase effects (if decommissioning is required) should be demonstrably secured in the DCO.

ID	Ref	Description	Inspectorate's comments
223	Paras 5.4.11, and 5.4.20 to 5.4.22	Decommissioning of offshore components	The Scoping Report sets out a similar position for offshore components as onshore but proposes a high-level assessment in line with the decommissioning principles of The Crown Estate in the ES. The Inspectorate is content with the applicant's approach but advises that the ES should provide as much detail as possible about the expected decommissioning activities and consider future climate and erosion trends. It should indicate as far as possible assumptions made about options for decommissioning and explain how these have been considered in the assessment of different aspects of the environment. Where alternative options are presented in the ES, the worst-case scenario should be addressed. For example, if flexibility is retained for either removal or retention in situ of the undersea cables. It should be clear how future detailed assessment of decommissioning phase effects would be secured.
224	Paras 5.5.4, 5.5.5, 5.5.9 and 5.5.10	Use of professional judgment	Where the ES utilises professional judgement to either assign significance or in the absence of a recognised methodology, the ES should provide a justification and methodology for this. Where judgement is used to assess that a significance of 'moderate effect' is not considered a significant effect, this should clearly be stated in the ES.
225	Various	Design and control measures	For each aspect, the Scoping Report describes design and control measures that are proposed to be implemented to minimise effects. The ES should include a full description of proposed design measures that are relied upon to avoid or minimise likely significant effects. It should explain how the measures would be secured and implemented, including in the context of any flexibility that is sought in the DCO. It should describe any engagement that has been held about design measures,

ID	Ref	Description	Inspectorate's comments
			including for example with affected landowners, and whether agreement has been reached.
226	N/A	Environment Agency (EA) data	Applicants 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 assessment.
227	N/A	Additional guidance and data sources	The applicant's attention is drawn to the comments of the EA, JNCC and NE (Appendix 2 of this Opinion) regarding additional guidance and data sources for flood risk and coastal erosion, coastal habitat mapping and the condition of designated sites. The ES should be informed by these sources as relevant to the assessment.
228	N/A	Study area and Zone of Influence (Zol)	The Inspectorate notes that the study areas for many of the assessments use buffers of a fixed distance from the scoping boundary. The applicant should ensure that the study areas of each assessment reflect the likely extent of potential significant effects. Where effects are likely to extend beyond a fixed distance in discrete areas, for example, variations in tidal excursion, then this should be reflected in the Zol and corresponding study area. The ES should also clearly justify, with evidence, how each study area reflects the Zol for the proposed development and, where possible, seek agreement with the relevant consultees.

3. ENVIRONMENTAL ASPECT COMMENTS - ONSHORE

3.1 Biodiversity

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6-9, paras 6.6.3 to 6.6.5	Natterjack toad (all impacts, all stages)	The Scoping Report identifies that the nearest records are approximately 8.3km from the proposed development site and that there is no suitable breeding habitat within the proposed development site. The Inspectorate notes Lincolnshire County Council's response identifying that the species is thought to be expanding into more inland areas. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.1.2	Table 6-9, 6.6.4 and paras 14.6.6 to 14.6.9	Air quality effects on Greater Wash Special Protection Area (SPA) (all stages)	The Scoping Report considers that although the SPA overlaps with the study area, it does not contain sensitive habitats and tidal flushing removes deposited pollutants and dilutes them, therefore no impacts are anticipated. The Inspectorate agrees that air quality effects on the Greater Wash SPA is unlikely to lead to significant effects and therefore can be scoped out of further assessment.
3.1.3	Table 6-9	Maintenance activity impacts (lighting, noise, dust, pollutants, vehicle	The Inspectorate agrees that the proposed maintenance activities described in Table 4-5 are likely to be temporary, short-term, and localised and are therefore not likely to lead to significant effects and may be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		collisions) during operation	
3.14	Table 6-9	Increased nitrogen deposition/ammonia from operational/maintenance traffic	Scoping Report Table 6-9 states that vehicle trips during operation/maintenance are below screening criteria and therefore significant effects are not likely. The Inspectorate agrees that on the basis this is confirmed in the ES, this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.15	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. Applicants should ensure that the use of confidential annexes is kept to the minimum necessary to avoid the types of harm described above.
3.16	Table 6-8	Impacts during construction	The ES should assess potential impacts from specific construction methods. For example, damage to terrestrial habitats from bentonite breakout should a trenchless method be used for cable installation. The ES should identify a list of receptors assessed for each potential impact and justify any receptors that are scoped out for specific effects.
3.17	Table 6-5	Humber Estuary Special Area of Conservation (SAC)	Table 6-5 identifies international designated sites within 10km of the proposed development onshore elements. The Humber Estuary SAC site is not included in Table 6-5 despite sharing similar boundaries as the Humber Estuary SPA and Ramsar and being

ID	Ref	Description	Inspectorate's comments
			located within 10km as identified in Figure 6-1. The ES should assess potential impacts to the Humber Estuary SAC where significant effects are likely to occur.

3.2 Cultural Heritage

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Para 7.6.5 and Table 7-5	Land preparation impacts to designated heritage assets within the footprint of the English Onshore Scheme (Construction phase)	The Scoping Report identifies in paragraph 7.4.10 that there are only two designated heritage assets (grade II listed buildings) located within the Scoping boundary and on the basis that these would be avoided in the final design, these are proposed to be scoped out. This does matter does not relate to potential impacts on setting; the Inspectorate's comments on impacts to the setting of heritage assets can be found in ID 3.2.3 below. The Inspectorate notes that Figure 7-1 identifies three designated heritage assets that overlap with the red line boundary. On the basis that it is demonstrated in the final design proposed in the ES that physical impacts from land preparation to designated heritage assets within or adjacent to the footprint of the onshore scheme are avoided, the Inspectorate agrees to scope this matter out.
322	Para 7.6.5 and Table 7-5	Direct physical impacts on heritage assets and archaeological remains beyond the footprint of the English Onshore Scheme permanent infrastructure (Construction phase)	The Scoping Report states that no physical disturbance, damage, or alteration would arise to heritage assets and archaeological remains located outside the footprint of the onshore permanent infrastructure. Whilst the Inspectorate agrees that this may apply to designated heritage assets through avoidance (as addressed in ID 3.2.1 above), this does not explain how this would apply to any other heritage assets eg non-designated and archaeological assets, that may be outside of, but adjacent to the red line boundary. In the absence of information such as archaeological remains likely to be found within the study area or evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out from the assessment. The ES should provide an assessment of direct physical impacts on heritage assets and archaeological remains during construction, including consideration for potential impacts that may affect the preservation state of adjacent remains, or provide the information

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			referred to demonstrating agreement with the relevant consultation bodies and the absence of significant effects.
323	Para 7.6.5 and Table 7-5	Temporary effects during construction arising through change within the setting (Construction phase; applies to both designated and non-designated heritage assets and historic landscape character)	Scoping Report paragraph 4.5.1 states that onshore construction is anticipated to last up to 5 years however, impacts are stated to be temporary and therefore significant effects from the change in setting are not anticipated. However, some impacts such as construction of the substations would then continue into the operational phase. Additionally, although impacts may be temporary, the magnitude of effects is also dependent on the nature of change and the extent of the asset that would be affected. The Inspectorate agrees that this matter can be scoped out on the basis that any continuing impacts from construction that could potentially lead to LSE in the operational phase are assessed for the operational phase in the ES.
324	Para 7.6.5 and Table 7-5	Maintenance phase: Repairs to above ground infrastructure or buried cables (Maintenance phase; applies to designated and non-designated heritage assets and historic landscape character)	The Inspectorate agrees that impacts to designated and non-designated heritage assets and historic landscape character from repairs to above ground and below ground cable infrastructure can be scoped out of further assessment based on the identified measures in Table 4-5.
325	Table 7-5	Direct physical impacts to designated and non-designated heritage assets and archaeological remains during construction within	Scoping Report Table 7-5 does not identify this as a potential impact to be scoped in although it states 'heritage assets within the footprint of the English Onshore Scheme will have been removed' within the table. Additionally, there are a number of identified above ground assets within the footprint of the proposed development, and it is unknown what archaeology is present at this stage.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		the footprint of the proposed development	On this basis, the Inspectorate expects this matter to be scoped in. This should include all construction activities and not be limited to land preparation.

ID	Ref	Description	Inspectorate's comments
326	Para 7.7.3	Trial trenching areas	The Inspectorate notes that Scoping Report paragraph 7.7.3 identifies that trial trenching will be undertaken in 'blank areas' identified by geophysical and desk based surveys. The applicant should also consider utilising trial trenching to validate findings of archaeological remains based on the geophysical and desk based results.
327	N/A	Unexploded Ordnance (UXO)	UXO and possible disturbance is not mentioned in the Scoping Report for the onshore scheme. The ES should confirm through baseline characterisation whether there is potential to impact UXO and where this is the case, provide an assessment of significant effects or explain how such receptors would be avoided.

3.3 Landscape and Visual Amenity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.1	Figures 8-1 and 8-2 and Table 8-6	Short term impacts from construction activities on Landscape receptors: located outside of the study area with the exception of the Lincolnshire National Landscape	Figures 8-1 and 8-2 of the Scoping Report illustrate the zone of theoretical visibility (ZTV) for the proposed converter station. The figures do not indicate the extent to which construction activities may be visible but demonstrate that the ZTV extends beyond the proposed 3km study area. The Scoping Report states that effects on landscape units beyond the study area will be limited to perceptual qualities perceived locally and would not be directly affected therefore significant effects are not likely. Based on the information provided, the Inspectorate does not agree to scope out impacts on landscape and visual receptors beyond the proposed study areas, as there is insufficient evidence to justify the proposed study areas at this stage. The applicant should seek to agree the study area with relevant statutory bodies.
33.2	Figures 8-1 and 8-2 and Table 8-6	Short term impacts from construction activities on Visual receptors – employees and transport users	Figures 8-1 and 8-2 of the Scoping Report illustrate the ZTV for the proposed converter station. The figures do not indicate the extent to which construction activities may be visible. However, the Inspectorate agrees that effects are not likely to be significant on the basis that impacts would be short term and transport and employee receptors are generally of low sensitivity. This matter can be scoped out of further assessment.
33.3	Figures 8-1 and 8-2 and	Short term impacts from construction activities on visual receptors outside the study area	Figures 8-1 and 8-2 of the Scoping Report illustrate the ZTV for the proposed converter station. The figures do not indicate the extent to which construction activities may be visible but demonstrate that the ZTV extends beyond the proposed 3km study area.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Table 8-6		The Scoping Report states that impacts to receptors beyond the study area will be minimized due to the screening of intervening vegetation, landform and built form, however there is limited evidence to support this. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
334	Tables 6-7 and 8-6	Construction – impacts from night time lighting throughout the cable route corridor on vegetation alongside effects on identified landscape character units in the study area at the national and local level and alongside the Lincolnshire Wolds National Landscape and visual receptors located within the study area	The Scoping Report provides some detail of mitigation measures in relation to lighting in Table 6-7 in order to minimise potential effects. Impacts from lighting are proposed to be scoped out on the basis of impacts being short term. The short term nature of lighting is currently not understood from the Scoping Report ie what receptors would be impacted by the lighting and how long night time lighting would be required and in which areas. It is also unclear from the wording of the Scoping Report what is meant by 'vegetation alongside effects on identified landscape character units' ie whether vegetation and landscape character units are considered separate receptors or it is referring to some interlinkage. On this basis, the Inspectorate does not agree to scope this matter out. The ES should provide an assessment of impacts from night time lighting to landscape receptors where they are likely to be significant or provide appropriate justification, supported by evidence of agreement from relevant consultation bodies as to why effects would not be significant.
335	Table 8-6	Change in the views and perceptual qualities of Lincolnshire Wolds National Landscape on visual amenity alongside perceptual qualities of	The Scoping Report claims limited intervisibility between converter stations and medium-term perceptual impacts. The Inspectorate does not agree to scope this matter out on the basis that insufficient information has been provided to exclude further consideration, as individual stations may still have effects regardless of intervisibility, and medium-term impacts could still be significant. The ES should either provide an assessment of likely significant effects or provide sufficient evidence to demonstrate that significant effects are not likely, supported by evidence of agreement from relevant consultation bodies.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		landscape character during construction and operation	
33.6	Table 8-6	Permanent night-time lighting associated with the converter station during operation on: • LCAs wholly or partly within 3 km of converter stations • visual receptors within the defined study area	The Inspectorate agrees that on the basis the ES secures that permanent lighting would be limited/sporadic for maintenance and repair activities, that this matter can be scoped out of further assessment.
33.7	Table 8-6	Permanent presence of the converter station on landscape receptors located outside the study area during operation	Figures 8-1 and 8-2 of the Scoping Report illustrate the ZTV for the proposed converter station. The figures demonstrate that the ZTV extends beyond the proposed 3km study area. The Scoping Report states that effects on landscape units beyond the study area will be limited to perceptual qualities perceived locally and would not be directly affected therefore significant effects are not likely. Based on the information provided, the Inspectorate does not agree to scope out impacts on landscape and visual receptors beyond the proposed study areas, as there is insufficient evidence to justify the proposed study areas at this stage (see box ID 3.4.12 below). The applicant should seek to agree the study area with relevant statutory bodies and ensure that the assessment of effects is based on the agreed study area.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.8	Table 8-6	Permanent presence of the converter station on visual receptors – employees, transport users during operation	The Inspectorate agrees that effects are not likely to be significant on the basis that impacts would be short term and transport and employee receptors are generally of low sensitivity. This matter can be scoped out of further assessment.
33.9	Table 8-6	Permanent presence of the converter station on visual receptors outside study area during operation	Figures 8-1 and 8-2 of the Scoping Report illustrate the ZTV for the proposed converter station. The figures demonstrate that the ZTV extends beyond the proposed 3km study area. The Scoping Report states that impacts to receptors beyond the study area will be minimized due to the screening of intervening vegetation, landform and built form, however there is limited evidence to support this. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
33.10	Table 8-6	Impacts from maintenance activities on all landscape and visual receptors	The Inspectorate agrees that on the basis the ES confirms maintenance activities would be temporary and mainly restricted to the converter station, this matter may be scoped out of further assessment.
33.11	Para 8.8.1	Residential Visual Amenity Assessment (RVAA)	The Scoping Report proposes to scope this matter out on the basis that the LVIA would provide an assessment of views from private properties based on representative viewpoints. The Inspectorate does not agree to scope this matter out. The Inspectorate understands that in the Landscape Institute's Technical Guidance Note TGN 2/19: 'Residential Visual Amenity Assessment' the requirement for an RVAA is generally dependent on the outcome of a LVIA. The need for an RVAA should be justified based on the conclusions

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			of the LVIA presented in the ES and agreed with the relevant consultation bodies. In the absence of a LVIA, the Inspectorate does not have sufficient evidence to agree to scope this matter out of further assessment.

3.4 Water Environment

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 9-6	Pollution due to soil stripping, earthworks and excavations and use and refuelling of plant (Construction phase; Receptors: main rivers, ordinary watercourses, intertidal zone, existing water interests, nature conservation sites)	This is scoped out on the basis that measures outlined in paragraph 9.5.3 will mitigate potential effects. The Inspectorate also notes in Scoping Report paragraph 11.5.1 that a soil management plan is also proposed to appropriately handle and manage soils. However, pollution risks and disturbance and handling of contaminated soils during earthwork operations in Table 10-10 are scoped in for further assessment for the Geology and Hydrogeology Chapter suggesting there is potential for likely 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 these matters 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.
34.2	Table 9-6	Pollution and physical disturbance caused by maintenance activities (Operation/Maintenance phase; Receptors: main rivers, ordinary watercourses, existing water interests, nature conservation sites)	Scoping Report Table 9-6 states that maintenance activities would be low impact, generally limited to non-intrusive inspections undertaken in line with the applicant's operational management procedures. The Scoping Report also states that the ES will provide specific information on management procedures to safeguard water receptors during operation. The Inspectorate agrees that maintenance activities would be unlikely to cause significant effects and can be scoped out of further assessment. The ES should describe the relevant mitigation measures to safeguard the water environment during operation and explain how these are secured.
34.3	Table 9-6	Pollution due to discharges of operational surface water drainage	Scoping Report Table 9-6 states that rainfall runoff from above ground infrastructure would be sustainably attenuated and treated prior to discharge to the receiving water environment. However, impacts to increased flood risk and land drainage is scoped in on

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(Operation phase; Receptors: main rivers, ordinary watercourses, existing water interests, nature conservation sites)	the basis that new impermeable areas would be introduced into the floodplain and therefore it is unclear whether/how flooding runoff, and subsequently pollution within operational surface water discharge would be appropriately managed. Additionally, the Inspectorate notes that substations carry inherent risk of pollution from runoff and firewater during fire emergencies. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
344	Table 9-6	Physical disturbance and change to flow regime and hydromorphology (Operation/Maintenance phase; Receptors: main rivers, ordinary watercourses and their floodplains)	The Inspectorate agrees that given the nature of the operational proposed development, impacts on watercourse flow regimes or their hydromorphology are unlikely and may be scoped out of further assessment.
345	Para 9.4.17	Impacts from vibration on flood defence assets	Scoping Report paragraph 9.4.17 states that flood defences are situated along the coastal frontage of the Anderby Creek Landfall area. However, potential effects to these flood defences are not included in Scoping Report Chapter 9. As construction works have potential to cause vibration impacts which could affect flood defences, the Inspectorate considers that this matter should be scoped into the ES unless otherwise agreed with relevant consultation bodies.
346	Para 9.4.45 and	Future flood risk taking account of climate change	Whilst Scoping Report paragraph 9.4.45 identifies that climate change projections would be incorporated into the climate resilience of the proposed development, there is no proposed assessment of future flood risk as a result of the proposed development. This

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	table 9-6		should be assessed in the ES using appropriate, up to date climate change projections using the credible maximum climate change scenario.

ID	Ref	Description	Inspectorate's comments
34.7	Section 9.4	WFD and ES study areas	It's unclear whether the WFD and ES study areas are the same or different, and if they differ, the reason is not specified. All potentially affected waterbodies should be assessed for likely significant effects, using an appropriate ZOI in the ES.
34.8	Para 9.8.1	Water quality sampling and analysis	No water quality sampling and analysis is proposed on the basis that the applicant considers the existing baseline data available is sufficient. There is no evidence to support this such as relevant agreement from consultees. The ES should provide sufficient evidence to support the approach to characterisation of the baseline environment.
34.9	Para 9.8.1	Flood defence conditions	No baseline condition surveys for flood defences are proposed on the basis that the applicant considers the existing baseline data from the EA available is sufficient. The ES should provide sufficient evidence to support the approach to characterisation of the baseline environment such as relevant agreement with the EA.
34.10	Para 9.7.7	Surveys of watercourses	Scoping Report paragraph 9.7.7 states that surveys of main rivers are proposed but there is no mention of surveying of ordinary watercourses without further explanation. The ES should set out how the scope of surveys has been determined including any agreement with relevant consultees.
34.11	Table 9-6	Flood risk sources	Whilst impacts from flood risk are included in Table 9-6, the sources of flood risk are not identified. The ES should identify all potential sources of flood risk and assess likely significant effects where an impact pathway exists. This should take account of appropriate climate change projections using the credible maximum climate change scenario.
34.12	N/A	Impacts to flood defences	The Inspectorate notes that the EA have flagged in their consultation response that there is potential for the timing and design of the works to adversely impact the delivery of flood

ID	Ref	Description	Inspectorate's comments
			mitigation through beach nourishment as a coastal defence. The Inspectorate considers that the ES should assess potential significant effects on flood defences where they are likely to occur.
34.13	N/A	Chalk streams	The Inspectorate notes that the EA have flagged the omission of discussion on potential impacts to chalk streams. Unless otherwise agreed with the relevant consultation bodies, should chalk streams be located within the zone of influence and have potential to be impacted by the proposed development, the ES should include these as a sensitive receptor, explaining how their sensitivity is determined in the methodology and provide an assessment of significant effects where they are likely to occur.
34.14	N/A	Foul water management	Paragraph 4.3.71 identifies that there would be welfare accommodation as part of the proposed development but the Scoping Report does not confirm whether foul water management would be required and if so, how it would be managed. The Inspectorate notes that water supply would be required as per Table 9-6. The ES should confirm whether there will be a need for foul water management and provide details of this and how any mitigation is secured through the DCO.

3.5 Geology and Hydrogeology

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 10-10	Construction – impacts from land instability and geohazards from earthworms/ground operations to building and infrastructure	Any potential geohazards and land instability are proposed to be managed through design in line with relevant standards and informed by ground investigations. The Inspectorate agrees that this matter can be scoped out of further assessment on this basis.
35.2	Table 10-10	Construction – impacts from contaminants from construction plant use and refuelling and handling of construction materials and wastes to buildings and infrastructure, human health, controlled waters and Groundwater Dependent Terrestrial Ecosystems (GWDTE)	The Scoping Report identifies controls set out in paragraph 10.5.2 that are proposed to manage the storage and handling of construction materials and excavations including an emergency spill response plan and implementation of site drainage. On the basis that these measures would be implemented, and that pollution during other activities are proposed to be scoped in, the Inspectorate is in agreement that this matter can be scoped out of the ES. The ES should describe the mitigation measures relied upon to avoid significant effects and explain how delivery of these measures would be secured.
35.3	Table 10-10	Construction – impacts from disturbance of unforeseen contamination during earthwork operations, excavations and soil	The Scoping Report proposes a watching brief in section 10.5 to observe for any unforeseen contamination and minimise risk and ensure any suspected contamination would be handled and stored appropriately. The Inspectorate agrees that this matter can be scoped out of further assessment on this basis. The ES should describe the mitigation measures relied upon to avoid significant effects and explain how delivery of these measures would be secured.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		stripping to human health, controlled waters and GWDTEs	
354	Table 10-10	Construction – impacts from storage of construction materials and wastes leading to the generation of potentially contaminated runoff to human health, controlled waters and GWDTEs	The Scoping Report identifies controls set out in paragraph 10.5.2 that are proposed to manage the storage and handling of construction materials and excavations including an emergency spill response plan and implementation of site drainage. On the basis that these measures would be implemented, and that pollution during other activities are proposed to be scoped in, the Inspectorate is in agreement that this matter can be scoped out of further assessment. The ES should describe the mitigation measures relied upon to avoid significant effects and explain how delivery of these measures would be secured.
355	Table 10-10	Operation – impacts from build up of radon gas to human health	The Inspectorate agrees that as no structures are proposed within the western part of section 5 which is identified as a 1-3% risk in Table 10-5, this matter may be scoped out of further assessment.
356	Table 10-10	Operation – accidental spills/pollution at the converter station to human health, controlled waters and GWDTEs	The Inspectorate agrees that on the basis the study area for temporary works would be returned to the original land use, and where permanent infrastructure is present, these would not require significant fuel or oil storage, this matter can be scoped out of further assessment.
357	Table 10-10	Operation – runoff from impermeable surfaces to human health, controlled waters and GWDTEs	The Scoping Report details that a drainage strategy would be in place which would incorporate attenuation, and where required treatment prior to discharge. However, there is no indication of how runoff would be managed. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
35.8	Table 10-10	Operation – impacts from aggressive ground conditions being present causing the degradation of subsurface structures to the proposed development	The Scoping Report proposes that appropriate chemical testing of soils will inform the correct concrete classification. This would allow the applicant to mitigate against any potential risks. The Inspectorate agrees that on this basis, this matter can be scoped out of further assessment. However, the ES should describe the mitigation measures relied upon to avoid significant effects and explain how delivery of these measures would be secured.
35.9	Table 10-10	Groundwater quality - operation	The Scoping Report does not appear to make specific reference to the effects of any changes to groundwater physical or chemical properties as a result of thermal effects from the cables during operation. The Inspectorate considers that this should be scoped into the assessment of groundwater quality.
35.10	Table 10-10	Impacts from bentonite breakout	Scoping Report table 10-10 does not include potential impacts from bentonite breakout. The ES should assess potential likely significant effects on groundwater receptors from potential bentonite breakout.

ID	Ref	Description	Inspectorate's comments
35.11	Para 10.6.5 and Table 10-10	Source protection zones (SPZ)	SPZs are not included in the list of potential sensitive hydrogeological receptors in paragraph 10.6.5 or in Table 10-10. For clarity, the ES should assess potential significant effects to source protection zones where they are likely to occur.
35.12	Table 10-11	Receptor sensitivity omissions	Table 10-11 explains how receptor sensitivity has been applied to identified receptors in line with guidance. Figure 10-4 identifies both SPZ2 and SPZ3 as located within the red

ID	Ref	Description	Inspectorate's comments
			line boundary however, it is not explained how receptor sensitivity would be applied to these receptors in Table 10-11. The ES should explain how receptor sensitivity is determined for SPZ2 and SPZ3 in line with relevant guidance.

3.6 Agriculture and Soils

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 11-5	Operation and maintenance – temporary and permanent loss of agricultural land	The Scoping Report notes that access for maintenance may require temporary access tracks and small compound areas, but these are likely to be limited in extent. Maintenance activities are set out in Table 4-5. The Inspectorate agrees that this matter can be scoped out of further assessment on the basis that the loss of agricultural land is proposed to be assessed during construction. However, the ES should include a description of expected maintenance activities, including their extent and duration. It should also explain how the intention to undertake all soil handling in line with good practice would be secured.
36.2	Table 11-5	Operation and maintenance – Impacts to soil ecosystem services	On the basis of the maintenance activities set out in Scoping Report Table 4-5, the Inspectorate agrees that disturbance would be infrequent and minimal. The Inspectorate agrees that this matter can be scoped. However the ES should provide a description of the expected maintenance activities including their extent and duration. It should also explain how the intention to undertake all soil handling in line with good practice would be secured. .
36.3	Table 11-5	Operation and maintenance – temporary acquisition and permanent loss of agricultural land holdings	The Inspectorate agrees that this matter can be scoped out on the basis that maintenance would require only periodic vehicle access and impacts would be limited in extent and access arrangements. The ES should demonstrate how access arrangements are designed to limit disturbance to landowners.

ID	Ref	Description	Inspectorate's comments
364	N/A	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Agricultural Land Class which would be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. The assessment should take into account the presence of Best and Most Versatile (BMV) land and Any use of BMV land should be addressed in the applicant's discussion of alternatives.

3.7 Traffic and Transport

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 12-10	Impacts to non-motorised users, public rights of way (PRoW) users, motorists and freight vehicles, public transport users and emergency services from traffic generated by the onshore scheme during operation	The Scoping Report states that operational vehicle movements would not exceed the thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines – Environmental Assessment of Traffic and Movement (EATM) (2023). It states that the ES will confirm the operational vehicle types and numbers (with reference to thresholds within the guidance) to justify this position. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.
37.2	Table 12-10	Impacts to roads, PRoW and users of these routes from hazardous loads during construction and operation	On the basis that no hazardous loads are anticipated during construction or operation of the proposed development, the Inspectorate agrees to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
37.3	Paras 12.4.13 and 12.7.16	Personal injury collision (PIC) records	The Scoping Report states at paragraph 12.4.13 that PIC records would be examined for a 5 year period prior to the Covid-19 pandemic and all PIC records since then; however, paragraph 12.7.16 states that PIC records for the period 2021 to 2023 would be examined to inform an assessment of road safety. The Inspectorate advises that the most recent collision risk data should be used to inform the assessment unless there are reasons why this data is not reliable. The ES should explain the basis on which the assessment has been carried out, by reference to relevant guidance.

ID	Ref	Description	Inspectorate's comments
3.7.4	Table 12-7	Traffic data from DfT manual count points	The average annual daily traffic (AADT) data from DfT manual count points for the B1449 Thurlby Road is from 2019. Noting the age of this data, the Inspectorate advises that the ES should justify why it remains a valid data source from which to undertake assessment.
3.7.5	Para 12.6.8	Transport assessment (TA)	The Scoping Report states that it is not considered a TA would be required because the peak hour traffic flows during operation of the proposed development are anticipated to be very low. It is proposed that a transport technical note (TTN) would be used to inform the ES, which would set out all movement related forecasting and methodologies. The Inspectorate advises that the peak construction year should be clearly identified in the TTN and CTMP. The Inspectorate agrees with the proposed approach for the operational phase and advises that the TTN should be appended to the ES. The applicant's attention is drawn to Lincolnshire County Council's (LCC) comments (Appendix 2 of this Opinion) regarding the requirement for a TA for the construction phase assessment. Effort should be made to agree the scope of the construction phase TA with relevant consultation bodies including LCC; it should form an appendix to the ES.
3.7.6	Para 12.7.19	Data collection	Efforts should be made to agree the location, timing and method for surveys including traffic and PRow counts with relevant consultation bodies, including the highways authority. Evidence of agreement or otherwise should be presented in the ES.
3.7.7	N/A	Construction route figure(s)	The location of the proposed Alford Bypass construction route and key routes outside of the scoping boundary, should be illustrated on an ES figure(s).

3.8 Noise and Vibration

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 13-6	Noise generated by construction traffic on motorway routes	This matter is proposed to be scoped in for receptors within 50m of construction traffic routes where there would be an increase in noise of 1 decibel (dB) (A) or more, other than motorways. For motorways, the Scoping Report states the construction traffic would not significantly alter flows. The Inspectorate agrees that increased construction traffic on motorways is unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.
38.2	Table 13-6	Vibration from activities other than piling and ground stabilisation, including on site haul roads during construction	The Scoping Report states that it is unlikely that sensitive receptors would be disturbed by vibration from general construction at distances of 20m or more based on guidance in Transport and Road Research Laboratory Supplementary Report 328. Information on plant to be used has not been provided nor have details of construction methods. Based on the information provided, the Inspectorate does not agree to scope this matter out of further assessment. The ES should include an assessment of these matters, or information demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.
38.3	Table 13-6 and para 13.8.1	Vibration from traffic on existing highways during construction	The Scoping Report proposes to scope out an assessment of vibration from construction traffic on the basis that significant effects are not expected assuming that road surfaces are free from irregularities. The Inspectorate agrees that vibration from traffic during construction is unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
384	Table 13-6	Noise from traffic associated with the converter station during operation	The Scoping Report proposes to scope this matter out on the basis that the converter station would not generate levels of road traffic noise that would change the current noise level by more than 1dB(A). On the basis that road traffic associated with operational maintenance of the converter station would not result in a noise increase from baseline conditions of more than 1dB(A), the Inspectorate agrees that significant effects from maintenance of the converter station are unlikely to occur. However, the ES should clarify the anticipated number and routing of road vehicle movements during operation of this component.
385	Table 13-6	Noise from underground onshore cables during operation	The Scoping Report proposes to scope out an assessment of noise from underground cables during operation as undergrounding mitigates to the point it would not be audible above ground. The Inspectorate agrees that noise from the operation of the underground cable is unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.
386	Table 13-6	Vibration associated with static plant at the converter station during operation	The Scoping Report proposes to scope out an assessment of vibration from static plant at the proposed converter station during operation on the basis that it would be mounted on suitable anti-vibration mounts to eliminate vibration. The Inspectorate agrees that vibration from static plant during operation is unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.
387	Table 13-6	Noise and vibration associated with maintenance of the underground onshore cables and converter station during operation	The Scoping Report proposes to scope this matter out on the basis that maintenance activities are likely be infrequent, localised and short term, and would follow standard measures to reduce effects, and so significant effects are not expected. The Inspectorate agrees that noise and vibration associated with maintenance of underground cables and the converter station during operation are unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should describe the expected maintenance activities and any measures proposed to mitigate effects arising from these (refer to ID 3.8.9); it should confirm how the mitigation would be secured.

ID	Ref	Description	Inspectorate's comments
3.8.8	Paras 13.7.2 and 13.7.9	Baseline noise for construction assessment	The Scoping Report states that the construction noise assessment would be undertaken from the lower noise threshold (Category A) in British Standard (BS) 5228-1 for a rural setting unless there is a justification for a higher threshold for example via noise survey or Defra noise mapping at specific locations. The Inspectorate notes that baseline noise surveys are proposed at the converter station but not along the onshore underground cable routes. In the absence of baseline survey, the Inspectorate advises that the lower noise threshold should be used as the baseline for assessment of construction impacts along the underground cable route to provide a worst-case assessment.
3.8.9	N/A	Noise associated with operational traffic for maintenance of infrastructure components other than the converter station	The Inspectorate notes that the Scoping Report seeks to scope out operational traffic noise associated with the converter station (see ID 3.8.4 of this Opinion) but is silent in respect of operational traffic noise associated with maintenance of other components such as the underground cable and offshore cable. The ES should include an assessment of these matters, or it should set out information demonstrating agreement with the relevant consultation bodies that this matter can be scoped out of assessment and the absence of likely significant effects.

3.9 Air Quality

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Paras 14.6.6 to 14.6.9	Air quality effects to the Greater Wash SPA during construction and operation	The Scoping Report identifies that the habitat (shifting coastal dunes and coastal dune grasslands) of bird qualifying features of the Greater Wash SPA are sensitive to nitrogen deposition but that these would not require further assessment of air quality effects as there is no overlap between the habitat and the onshore scheme, and the affected area of the SPA is subject to tidal flushing that is likely to have a much greater influence on botanical composition than atmospheric nitrogen inputs and to remove a large proportion of any nitrogen that deposits from the atmosphere. Based on the information presented, the Inspectorate agrees that this matter can be scoped out of further assessment.
39.2	Table 14-9, paras 14.4.21 and 14.6.16 to 14.6.17	Increased likelihood of non-compliance with limit values (LV) through increases in pollutant concentrations near Defra Pollution Climate Model (PCM) links affecting public access and sensitive receptors within 15m during construction and operation	The Scoping Report proposes to scope this matter as existing concentrations on the nearest PCM link in the onshore scoping boundary and surrounding 2km buffer are very low and highly unlikely to cause exceedances of LV for nitrogen oxide (NO₂) or particulate matter (PM_{2.5} or PM₁₀). Paragraph 14.4.21 provides the 2023 predicted annual mean NO₂, PM_{2.5} and PM₁₀ concentrations at the closest PCM link to the onshore scoping boundary (A52 High Street), which are well below the respective LVs for these pollutants. It states that it is unlikely the proposed development would cause the East Midlands non-agglomeration zone to be non-compliant. Based on the information presented, the Inspectorate agrees that this matter can be scoped out of further assessment.
39.3	Table 14-9	Increase in pollutant concentrations from vehicle emissions	The Scoping Report proposes to scope this matter out based on experience of projects of this nature having very low operational phase vehicle flows and stating that vehicle types

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		affecting sensitive human or ecological receptors within 200m during operation	and numbers with reference to thresholds in guidance would be presented in the ES to justify this position. The Inspectorate is content that this matter can be scoped out of further assessment provided that the ES confirms that operational vehicle types and numbers are below the relevant Institute of Air Quality Management (IAQM) or Design Manual for Roads and Bridges (DMRB) LA 105 screening criteria.
394	Table 14-9	Increase in pollutant concentrations from emergency backup diesel generators at the converter station site affecting sensitive ecological receptors within 200m during operation	The Scoping Report proposes to scope this matter out on the basis that there are no international or nationally designated ecological sites within 200m of the emerging preferred siting zones for the converter station. Based on the information presented, the Inspectorate agrees that this matter can be scoped out of further assessment in respect of use of emergency backup diesel generators at the converter station site. The ES should confirm that this type of plant would not be used at other onshore locations within 200m of sensitive ecological receptors during operation.

ID	Ref	Description	Inspectorate's comments
395	Figure 14.1	Sea Bank Clay Pits SSSI	The Inspectorate notes that Sea Bank Clay Pits SSSI is not outlined on Figure 14.1, as suggested in the Scoping Report. It should be shown on ES figure(s) supporting the air quality assessment if it is scoped in for further assessment.
396	Paras 14.4.11 and 14.7.3	Baseline conditions and project specific survey	It is not proposed to carry out project specific air quality monitoring but to use data gathered from EGL3 and EGL4 monitoring if detailed dispersion modelling is needed. The ES should justify the use of baseline monitoring obtained to inform the EGL3 and EGL4 DCO application where it is used, explaining why it is relevant to understanding the baseline for, and assessing the impacts of, the proposed development.

ID	Ref	Description	Inspectorate's comments
39.7	Para 14.7.32	Emergency backup diesel generators at locations other than construction compounds and the converter station site during construction	The Scoping Report states that increase in pollutant concentrations from generators would be assessed for a study area of 200m from the construction compounds and finalised converter station location. It states that whilst non-road mobile machinery (NRMM) could be used anywhere within the order limits during construction, generators used elsewhere would be of a size and use frequency that means they do not need to be assessed. In the absence of detailed information about the type, number, location or operational hours of NRMM in other locations and likely emissions, the Inspectorate considers that the assessment area should not be reduced at this stage. The ES should assess NRMM emissions during construction at all locations where these are proposed within 200m of a sensitive receptor or it should set out information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The ES should describe any mitigation measures relied on to avoid LSE and explain how delivery of these would be secured.
39.8	N/A	Baseline data sources	The applicant should consider use of the Air Pollution Information Source (APIS) as a data source to identify the sensitivity of habitats and features of designated sites.

3.10 Socio-Economics, Recreation and Tourism

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 15-12	Employment generation during operation	The Inspectorate agrees that no significant operational employment effects are anticipated and that this matter can be scoped out of further assessment.
3.10.2	Table 15-12	Temporary or permanent effects to businesses, development land, private property, housing, community land, assets and recreational facilities from disruption of access, land take or amenity during construction	Potential effects to access are proposed to be mitigated via measures in the CEMP to maintain access to businesses and development land. Effects on amenity are proposed to be assessed in other relevant chapters including noise and vibration, landscape and visual and air quality. For clarity the Inspectorate considers that effects on amenity for non motorised users should also be considered in the traffic and transport chapter. The Inspectorate agrees that this matter can be scoped out on the basis access is secured through the CEMP and that it is clear where amenity is assessed elsewhere in the ES.
3.10.3	Table 15-12	Temporary or permanent effects to businesses, development land, private property, housing, community land, assets and recreational facilities	The Inspectorate also agrees that given the nature of the operation of the proposed development, no significant effects are anticipated during operation and therefore can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		from disruption of access, land take or amenity during operation	
3.104	Table 15-12	Effects to walkers, cyclists or horse riders (WCH) using PRow, visitors and users of tourist attractions and users of tourist accommodation during operation	The Scoping Report states that operational impacts would be unlikely to cause significant effects to these receptors on the basis that appropriate design and control measures, such as those presented in Scoping Report section 8.5, are secured through the DCO. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE

3.11 Health and wellbeing

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 16-6	Physical health effects to the general population and vulnerable groups from electric and magnetic fields (EMF) during operation	The Scoping Report proposes to scope this matter out on the basis that the onshore scheme will ensure that policies and procedures are in place at the design phase to ensure that all equipment will comply with public EMF exposure limits. It states that evidence of compliance with exposure requirements would be summarised in the ES. The Inspectorate agrees that an assessment of physical effects from EMF during operation can be scoped out of further assessment in the ES.

ID	Ref	Description	Inspectorate's comments
3.11.2	Paras 16.4.1 and 16.4.3	Study area	The Scoping Report states that where assessment of health-related environmental change relies on data from other aspect chapters, the study area for that chapter will be referred to. It is unclear how the study area for the human health assessment would be consistent with study areas for other aspect chapters such as traffic, air quality or noise as it is based on all wards within the onshore scoping boundary. This should be explained in the ES. For example, the assessment of effects arising from an increase in vehicle movements during construction should be undertaken for a study area that reflects the ARN.
3.11.3	Para 16.7.3	Baseline surveys	The Scoping Report states that no baseline surveys would be undertaken and that the assessment would be informed by surveys from other aspect chapters and stakeholder engagement. The Inspectorate agrees that bespoke surveys are not required for the ES. The ES should include information about the baseline from relevant public data sources, for example any joint strategic needs assessment, to inform the assessment of LSE.

3.11.4	Para 16.7.7	Separate health impact assessment (HIA)	A separate HIA is not proposed as it is stated that the health and wellbeing ES chapter would meet this requirement and consider wider determinants of health and health inequalities. The Inspectorate agrees that a separate HIA is not required on that basis.

4. ENVIRONMENTAL ASPECT COMMENTS - OFFSHORE

4.1 Coastal and Marine Physical Processes

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	Table 18-9	Disturbance of subtidal seabed morphology during operation	The Scoping Report states that the potential for maintenance of the proposed development is low but it is possible the localised repair or remedial external cable protection may be required, which may need pre-sweeping to expose the cable section. It seeks to scope out this matter on the basis that the significance of effect would be of lower magnitude than during installation due to the areas being smaller. The Inspectorate agrees to scope this matter out providing that the ES clearly demonstrates that significant effects are not likely in relation to pre-sweeping, taking account of any activity required in proximity to major seabed features such as within the MCZ. The ES should confirm the worst-case parameters for disturbance arising from pre-sweeping to facilitate cable repair and remedial protection over the lifetime of the proposed development.
4.1.2	Table 18-9 and paras 18.5.3 to 18.5.4	Disturbance of intertidal seabed morphology during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out on the basis that HDD would be used to install the cable avoiding disturbance and resulting in a non-existent risk of cable exposure due to coastal retreat during operation. Based on the HDD ducts remaining in situ at decommissioning, the Scoping Report states there would be no impacts in the intertidal zone but commits to an assessment of decommissioning effects if the decommissioning method changes. It is proposed that commitment to HDD would be set out in a commitments register and compliance secured through the DCO or DML. Based on the information presented, the Inspectorate agrees that disturbance of intertidal morphology would be avoided through use of HDD during operation and decommissioning and there would be no likely significant effects. This matter can be scoped out of further assessment for these phases subject to a full commitment to trenchless installation at

			landfall, supported by appropriate baseline data (please see the Inspectorate's comments at ID 2.1.7 of this Opinion). Noting the advice received from the Marine Management Organisation (MMO) and EA (Appendix 2 of this Opinion), the Inspectorate cannot exclude the possibility of significant effects during construction for example from frac-out of drilling fluids or vibrations during drilling, or from indirect pathways arising from change at landfall with reach into the intertidal area. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.
4.13	Table 18-9	Modifications to tidal and wave regimes and associated impacts to morphological features during construction	The Scoping Report states that potential impacts to tidal and wave regimes from the presence of external cable protection would be assessed in operation as any impacts would occur from its continued presence during operation. If the ES confirms a definitive commitment to using a trenchless method at landfall and that no other infrastructure is used in the nearshore area that could result in alteration of sediment transport in the intertidal area, such as a cofferdam or cable protection, then the Inspectorate agrees that this matter can be scoped out for construction. Otherwise, the Inspectorate cannot exclude the possibility that there would be modification to tidal and wave regimes in the intertidal zone from construction activities and would require this matter to be assessed further in the ES. Effort should be made to agree the approach with relevant consultation bodies including JNCC and NE once further detail of required construction activities has been developed, and this should be evidenced in the ES.
4.14	Table 18-9	Release of contaminated sediments during construction, operation and decommissioning	The Scoping Report describes contaminant levels in the vicinity of the proposed development based on seabed testing for EGL4, for which samples were collected adjacent to the scoping boundary of the proposed development. Based on these samples, contaminated sediment is minimal with all samples aside from arsenic (8 locations), nickel (4 locations), lead and mercury (1 location for each) being below Centre for Environment, Fisheries and Aquaculture Science (Cefas) Action Levels 1 and 2, and National Oceanic and Atmospheric Administration (NOAA) effects range low (ERL) thresholds. It is stated that similar results are expected from testing of EGL3 samples although these are not yet

			available. Project specific sampling is proposed to validate that contaminated sediment is not likely to result in a significant effect. Based on the information presented, the Inspectorate agrees that this matter can be scoped out of further assessment. However, if the project specific sampling indicates that contamination levels exceed the relevant Cefas Action Levels or NOAA ERL thresholds then an assessment of any likely significant effects arising should be provided.
4.1.5	Table 18-9	Accidental releases or spills of materials or chemicals during construction, operation and decommissioning	The Inspectorate is content to scope this matter out noting the legal requirements upon vessels to manage any accidental releases or spills of materials or chemicals, and that relevant measures to comply with legislation will be outlined in management plans to be submitted with the DCO application.
4.1.6	Table 18-9	Changes to sediment quality from temperature increase during construction, operation and decommissioning	The Inspectorate is content to scope this matter out for construction and decommissioning as the cables would not be in operation during these phases of the proposed development. Regarding operation, the Scoping Report presents findings from heat calculations for EGL3 and EGL4, which conclude that based on an ambient seabed temperature of 12°C, seabed temperatures at 0.2m above the cable is estimated to be 13°C to 14°C with cables operating at maximum temperature. It states that this would result in a low magnitude of impact and no significant effects. The Scoping Report seeks to scope this matter out for the proposed development based on this, as a similar cable system is proposed. In the absence of a CBRA and confirmation of the cable burial depth that would be achieved, the Inspectorate does not have sufficient justification to exclude the possibility of significant effects. This matter should be scoped into the assessment or the ES should demonstrate, with evidence of agreement from relevant consultation bodies, an absence of likely significant effects.

ID	Ref	Description	Inspectorate's comments
4.1.7	Section 18.4	Use of EGL3 and EGL4 data modelling	The Scoping Report states that the proposed study area is informed by the tidal excursion, resulting in an area defined as the scoping boundary plus 15km each side. It states that

			this would be validated through fine sediment modelling carried out for EGL3 and EGL4. The applicant's attention is drawn to NE's comments (Appendix 2 of this Opinion) regarding reliance it can place on the outcomes of the spreadsheet model to inform the study area for effects from suspended sediment concentration (SSC) in the absence of detailed calculations. Effort should be made to agree the final study area for this impact pathway with relevant consultation bodies, based on suitable data sources.
4.1.8	Section 18.4	Baseline data	Where the ES uses baseline data from existing public records, it should specify when the data was collected. The most recent available data should be used to inform the design of construction works and assessment of associated effects. The applicant's attention is drawn to NE's comments (Appendix 2 of this Opinion) regarding several data sources including the European Marine Observation and Data Network (EMODnet) digital terrain model (DTM) and SEASTATES metocean data.
4.1.9	Para 18.6.1	Sensitive receptors	The list of potential receptors at paragraph 18.6.1 does not include designated sites, as described in section 18.4 of the Scoping Report. The ES should assess all potential receptors for which significant effects are likely.
4.1.10	Paras 18.7.2 and 18.7.6	Spreadsheet based models	It is proposed to produce spreadsheet-based models to inform assessment of SSC and sedimentation associated with installation activities. The ES should explain the method used and provide a justification as to why the assessment is robust, supported by evidence of agreement with relevant stakeholders.
4.1.11	Para 18.7.3	Hydrodynamic modelling	The Scoping Report states that no new hydrodynamic modelling is currently proposed to inform the assessment although this would be reviewed on receipt of particle size distribution (PSD) analysis. The Inspectorate understands that hydrodynamic modelling carried out for EGL3 and EGL4 would be used as the basis for assessment, noting reference to proximity of the proposed development to these projects and that PSD analysis of samples collected for EGL3 and EGL4 demonstrate a low percentage of fines. The assessment in the ES should be based on updated modelling covering the area affected or a justification as to why use of existing modelling provides a robust approach, supported by evidence of agreement with relevant consultation bodies.

4.1.12	N/A	Effect significance	The ES should confirm the threshold at which effects are significant for this aspect.
4.1.13	N/A	Sea level rise	The ES should clearly set out the climate change scenarios modelled and justify the scenarios used along with the management plan policies within the modelled area. The applicant's attention is drawn to the EA's comments (Appendix 2 of this Opinion) regarding the need to consider upper end and H++ scenarios in respect of sea level rise. The Inspectorate advises that the assessment should include consideration of these scenarios. NE in its consultation response advises that the management strategy for the Lincolnshire shoreline is likely to change due to coastal retreat over the lifetime of the proposed development. The Inspectorate advises that the implications of change both under the current hold the line strategy or a revised no active intervention policy should be considered in the assessment.
4.1.14	N/A	Figures	The ES should include figures illustrating the geomorphological baseline to aid interpretation of the textual description. It would also be beneficial to show the Holderness Inshore MCZ on a figure to illustrate its location relative to the 15km study area.

4.2 Intertidal and Benthic Ecology

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
421	Table 19-9	Temporary habitat loss or seabed disturbance in the intertidal habitat during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out during construction on the basis that HDD would be used as the installation method in the intertidal area to avoid disturbance, and during operation as any new duct required to address cable failure would be the subject of a new marine licence. The Inspectorate agrees this matter can be scoped out for construction and operation based on the information presented. It should be clear within the DCO application that cable repair and HDD duct replacement during operation would require a new marine licence and not be authorised through the DML. However, if the HDD entry or exit pits are planned to be located in the intertidal zone, the ES should include an assessment of any associated likely significant effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. Regarding decommissioning, it is stated that the cable would likely be left in situ with no further impacts. In the absence of a definitive proposal for decommissioning, the Inspectorate cannot exclude the possibility of likely significant effects for example due to disturbance from activities associated with cable removal. This matter should be assessed for decommissioning, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
422	Table 19-9	Temporary increase and deposition of suspended sediment in the intertidal habitat during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out during construction on the basis that HDD would be used as the installation method in the intertidal area to avoid disturbance, and during operation as any new duct required to address cable failure would be the subject of a new marine licence. Regarding potential frac-out of drilling fluid during construction, it states that bentonite poses little or no risk to the marine environment, limited smothering effect would occur as it would dilute within 1 or 2 tidal cycles and that measures to manage spills would be detailed in a marine pollution contingency plan.

			The Inspectorate agrees this matter can be scoped out for operation based on the information presented. It should be clear within the DCO application that cable repair and HDD duct replacement during operation require a new marine licence and would not be authorised through the DML. The Inspectorate is concerned about potential for subtidal construction activities to generate plumes that reach the intertidal area as noted by the MMO (Appendix 2 of this Opinion), and notes that the applicant acknowledges a risk of frac-out between the drilling bore and seabed/ sediment surface. Notwithstanding the proposed commitments to frac-out management, the Inspectorate considers this impact pathway could result in significant effects during construction and advises that this should be assessed in the ES. The ES should clearly describe any measures relied upon to control and manage HDD drilling fluid frac-out, including proposals for monitoring, and explain how its delivery would be secured. The Inspectorate's comments at ID 4.2.1 of this Opinion also apply to this matter for the decommissioning phase of the proposed development.
423	Table 19-9	Temporary increase and deposition of suspended sediments due to sandwave clearance (pre-sweeping) in subtidal habitat during operation	The Inspectorate agrees that where a cable requires repair because of third party damage, pre-sweeping is unlikely to be necessary as the cable would be on the seabed and, if pre-sweeping is necessary to repair faults where it was used during construction, this is unlikely to result in significant effects due to the limited spatial extent of the works. This matter can be scoped out of further assessment based on the information presented. The ES should confirm the expected frequency and nature of cable repairs in the subtidal habitat during operation.
424	Table 19-9	Underwater noise changes to subtidal species during construction, operation and decommissioning	The Inspectorate does not agree that significant effects relating to underwater noise on subtidal species is unlikely. The Scoping Report does not provide information to demonstrate that noise would be localised or evidence of the level of background noise that is currently present. Furthermore, in the absence of confirmed construction details the Inspectorate considers that this matter should be scoped in for further assessment or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.

425	Table 19-9	Electromagnetic changes or barrier to species movement to subtidal species from presence of cable during construction, operation and decommissioning	The Inspectorate agrees that there would be no impact pathway during construction and decommissioning as the cable would not be operational. This matter can be scoped out of further assessment for these phases of the proposed development. The Inspectorate notes the studies referenced in the Scoping Report to support the proposal to scope this matter out for the operational phase; however, the information suggests that some species would be attracted to magnetic fields and it states that effects at a population or community level cannot be inferred from the results presented in the studies. Given this, and in the absence of the proposed EMF study to validate that effects from EMF exposure would be negligible, the Inspectorate does not agree to scope this matter out at this stage. The ES should assess this matter or demonstrate an absence of likely significant effects, with evidence of agreement from relevant consultation bodies. The Inspectorate would also expect this matter to provide assessment and cross-referencing to the shellfish and fish aspect chapter, where this matter has been scoped in for further assessment.
426	Table 19-9	Temperature increase to subtidal habitats and species from presence of cable during construction, operation and decommissioning	The Inspectorate agrees that there would be no impact pathway during construction and decommissioning as the cable would not be operational. This matter can be scoped out of further assessment for these phases of the proposed development. Regarding operation, the Scoping Report presents findings from heat calculations for EGL3 and EGL4, which conclude that based on an ambient seabed temperature of 12°C, seabed temperatures at 0.2m above the cable are estimated to be 13°C to 14°C with cables operating at maximum temperature. It states that this would result in a low magnitude of impact and no significant effects. The Scoping Report seeks to scope this matter out for the proposed development based on this, as a similar cable system is proposed. In the absence of a CBRA and confirmation of the cable burial depth that would be achieved, the Inspectorate does not have sufficient justification to exclude the possibility of significant effects. This matter should be scoped into the assessment or the ES should demonstrate, with evidence of agreement from relevant consultation bodies, an absence of likely significant effects.

427	Table 19-9	Accidental spills from presence of project vessels and equipment to intertidal and subtidal habitats during construction, operation and decommissioning	The Inspectorate is content to scope this matter out noting the legal requirements upon vessels to manage any accidental spills, and that relevant measures to comply with legislation will be outlined in management plans to be submitted with the DCO application.

ID	Ref	Description	Inspectorate's comments
428	Table 19-9	National sites designated with benthic features scoped into the assessment	For the avoidance of doubt, the Inspectorate assumes that the reference to national sites would include international and European sites within the study area, including those listed at Table 19-8 of the Scoping Report.
429	Tables 19-10 and 19-11	Duration of impacts	Where the duration of impacts is being determined with reference to the time for recovery for various receptors, the ES should explain what evidence is being relied on to reach conclusions about the likely time for recovery from impacts.
4210	Table 19-11	Criteria for assessing impact magnitude	The Inspectorate advises that the proposed approach to defining impact magnitude should be clarified so that it is independent of receptor sensitivity and avoids any risk of double-counting. The applicant's attention is drawn to the MMO's comments (Appendix 2 of this Opinion) in this regard.

4.3 Fish and Shellfish

(Scoping Report Section 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	Table 20-14	Temporary habitat loss / seabed disturbance during: • seabed preparation • HDD duct excavation • cable burial and trenching • anchoring / jack-up legs • cable removal on for species with fully pelagic life cycle during construction, operation and decommissioning	The Scoping Report states that species with a fully pelagic lifecycle would not be affected by disturbance of the seabed. The Inspectorate notes that disturbance of subtidal seabed morphology has been scoped in for the construction and commissioning phases and refers to NE's comment (see Appendix 2 of this Opinion) regarding the relationship between marine processes and changes to prey availability. The applicant's attention is also drawn to ID 4.1.7 of this Opinion. For these reasons, the Inspectorate cannot exclude the possibility of significant effects for this matter during the construction and decommissioning phases. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies. Regarding the operational phase, please refer to ID 4.1.1 of this Opinion.
4.3.2	Table 20-14 and section 4.4	Permanent habitat loss during the deposit of cable protection for species with fully pelagic life cycle during	The Scoping Report states that species with a fully pelagic lifecycle would not be affected by localised seabed deposits. The Inspectorate refers to Section 4.4 of the Scoping Report which notes that the full extent of cable protection is currently unknown. Together with the NE's comments regarding the sediment modelling (please refer to ID 4.1.7 of this Opinion), the Inspectorate cannot exclude the possibility of significant effects for this matter. This matter

		construction, operation and decommissioning	should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.
4.3.3	Table 20-14	Temporary increase and deposition of suspended sediments - pre-sweeping - for shellfish and fish species with demersal life stage during operation	Please refer to ID 4.1.1 of this Opinion.
4.3.4	Table 20-14	Temporary increase and deposition of suspended sediments - pre-sweeping - for species with fully pelagic life cycle during construction, operation and decommissioning	Please refer to ID 4.3.1 of this Opinion.
4.3.5	Table 20-14	Temporary increase and deposition of suspended sediments during: • seabed preparation • HDD duct excavation • cable burial and trenching • anchoring / jack-up legs	The Scoping Report refers to the sediment plume modelling for EGL3 and EGL4 that concluded that the spatial extent of heavy smothering is localised as fine particles will settle within 3.15 km of the disposal location. The applicant's attention is drawn to NE's comment (Appendix 2 of this Opinion) regarding the methodology and data used to inform the sediment modelling calculations. For this reason, the Inspectorate cannot exclude the possibility of significant effects for this matter. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.

		• deposit of external cable protection • cable removal on shellfish and fish species with demersal life stage during construction, operation and decommissioning	
436	Table 20-14	Temporary increase and deposition of suspended sediments during: • seabed preparation • HDD duct excavation • cable burial and trenching • anchoring / jack-up legs • deposit of external cable protection • cable removal on herring during operation	Please refer to ID 4.1.1 of this Opinion.

4.3.7	Table 20-14	Temporary increase and deposition of suspended sediments during: • seabed preparation • HDD duct excavation • cable burial and trenching • anchoring / jack-up legs • deposit of external cable protection • cable removal on species with fully pelagic life cycle during construction, operation and decommissioning	The Scoping Report states that the sediment transport modelling undertaken for the EGL3 and EGL4 shows that any impact from SSC is expected to be small, localised and temporary, the Inspectorate is content to scope this matter out of further assessment. Please refer to ID 4.3.5 of this Opinion setting out the reason why the Inspectorate cannot exclude the possibility of significant effects for this matter. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.
4.3.8	Table 20-14	Accidental spills on all species during construction, operation and decommissioning	The Inspectorate is content to scope this matter out noting the legal requirements upon vessels to manage any accidental releases or spills of materials or chemicals. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.
4.3.9	Table 20-14	Introduction or spread of marine invasive nonnative species (INNS) on shellfish during construction,	The Inspectorate notes a number of commitments in the Scoping Report to manage effects. The Inspectorate agrees that this matter can be scoped out on the basis that the mitigation measures proposed within the Outline Construction Environmental Management Plan which would detail how the biosecurity plan would be implemented during all phases of the proposed development, should be sufficient to address the likely impacts and avoid

		operation and decommissioning	a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.
4.3.10	Table 20-14	Underwater noise changes due to the presence of project vessels and equipment on high and medium hearing sensitivity species during construction, operation and decommissioning	For construction, the Scoping Report explains that the noise modelling undertaken for the EGL3 and EGL4 concluded that impacts on fish as a result of project vessels and equipment was not significant and given that the construction activities for the proposed development will be identical and in a similar location, no significant effects are likely. In their consultation response, JNCC notes that the underwater noise modelling for EGL3 and EGL4 is still under discussion and has not been agreed to date. For this reason, the Inspectorate is not in a position to scope this matter out at this time. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.
4.3.11	Table 20-14 and para 20.4.28	Collision risk on basking shark during construction, operation and decommissioning	The Inspectorate is content that few basking sharks have been recorded in the study area in the 20 years and therefore the potential for collision is minimal and unlikely to be significant.
4.3.12	Table 20-14	Electromagnetic changes / barrier to species movement on electrosensitive species during construction, operation and decommissioning	The Inspectorate is content to scope this matter out for construction and decommissioning as at these phases, the cables are not in operation. Regarding the operation phase, the applicant's attention is drawn to paragraph 3.4.2 of the MMO's response which requests certain shellfish species to be scoped in owing to the expanse of the proposed development and the fact that some shellfish species have a migratory or movement phase within their annual or life cycles. The applicant's attention is also drawn to ID 4.2.5 of this Opinion. For these reasons, the Inspectorate does not agree to scope this matter out at this stage. The ES should assess this matter or demonstrate an absence of likely significant effects, with evidence of agreement from relevant consultation bodies.
4.3.13	Table 20-14	Temperature increase due to the presence of	The Inspectorate is content to scope this matter out for construction and decommissioning as at these phases, the cables are not in operation.

		cables on species with demersal life stage during construction, operation and decommissioning	Regarding the operation phase, please refer to ID 4.1.6 of this Opinion.
4.3.14	Para 7.4.2.19	Specific surveys for water vole, great crested newt and white-clawed crayfish.	In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of an LSE.

4.4 Intertidal and Offshore Ornithology

(Scoping Report Section 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
44.1	Table 21-13	Temporary increase and deposition of suspended sediments during: • Seabed preparation • HDD duct excavation • Cable burial and trenching • Anchoring / jack-up legs • Deposit of external cable protection • Cable removal on sea ducks during construction, operation and decommissioning	The Inspectorate agrees that given alternative feeding grounds are available for these species, that this matter can be scoped out, noting the temporary nature of the potential effect. The applicant's attention is drawn to the 'Chapter 21: Intertidal and Offshore Ornithology' section of the JNCC's response which requests that the common scoter is to be scoped in due to insufficient evidence concerning this species' sensitivity to suspended sediments. The Inspectorate advises that effects on this species should not be scoped out of further assessment. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of an LSE.
44.2	Table 21-13	Temporary increase and deposition of suspended sediments during:	The Scoping Report states that harriers and waders are not diving birds and therefore are unlikely to be adversely affected by a decrease in water clarity.

		• seabed preparation • HDD duct excavation • cable burial and trenching • anchoring / jack-up legs • deposit of external cable protection • cable removal on waders and harriers during construction, operation and decommissioning	The Inspectorate notes that waders rely on visual cues when hunting and given the NE's comments regarding the sediment modelling (refer to ID 4.1.7 of this Opinion) and for this reason, the Inspectorate cannot exclude the possibility of significant effects. This matter should be assessed in the ES, or the absence of significant effects should be demonstrated with evidence of agreement from relevant consultation bodies.
44.3	Table 21-13	Changes in distribution of prey species during: • pre-sweeping of sand waves • cable burial and trenching • cable removal on all species during construction, operation and decommissioning	The Scoping Report states that these activities will take place over a small section of the seabed, are transient in their nature and that alternative foraging areas are available. The applicant's attention is also drawn to ID 4.3.1 of this Opinion.

44.4		Changes in distribution of prey species during deposit of external cable protection during decommissioning	The Inspectorate is content to scope this matter out during decommissioning, noting that cable protection will not be deposited during decommissioning.
44.5	Table 21-13	Visual / physical disturbance or displacement due to the presence of project vessels and equipment on terns, gulls, kittiwakes, and gannets during construction, operation and decommissioning	It is noted that these species are unlikely to be significantly affected by the proposed development as they are less sensitive to noise and visual disturbance. The Inspectorate is therefore content to scope this matter out during all phases of the proposed development.
44.6	Table 21-13	Accidental spills due to the Presence of project vessels and equipment on all species during construction, operation and decommissioning	The Inspectorate is content to scope this matter out noting the legal requirements upon vessels to manage any accidental releases or spills of materials or chemicals. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.

4.5 Marine Mammals and Marine Reptiles

(Scoping Report Section 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	Table 22-10	Changes in supporting habitat and prey availability for otter and marine turtles during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out on the basis that otter and turtles are not likely to be present in the study area, and additionally for otter because impacts in the intertidal area would be limited using HDD as an installation method. The Inspectorate agrees that this matter can be scoped out of further assessment, noting that impacts to otter from the onshore scheme would be separately assessed in the biodiversity ES chapter.
4.5.2	Table 22-10	Underwater noise changes from geophysical survey affecting otter and marine turtles during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out on the basis that otter and turtles are not likely to be present in the study area, and exposure to noise would be extremely limited. The Inspectorate agrees that this matter can be scoped out of further assessment, noting that impacts to otter from the onshore scheme would be separately assessed in the biodiversity ES chapter.
4.5.3	Table 22-10	Underwater noise changes from presence of project vessels and equipment affecting cetaceans and pinnipeds during construction, operation and decommissioning	Referring to underwater noise modelling carried out for EGL3 and EGL4, which the applicant states would use the same vessels and equipment as the proposed development, the Scoping Report seeks to scope this matter out as it concluded noise would not be at a level to cause injury, although it would cause disturbance effects. The Inspectorate agrees that underwater noise change leading to auditory injury to cetaceans and pinnipeds can be scoped out based on the information presented. The ES should include a summary of the modelling completed for EGL3 and EGL4. Noting that the Scoping Report acknowledges potential for disturbance effects and the advice of JNCC (Appendix 2 of this Opinion), the Inspectorate does not have sufficient justification to agree that noise disturbance of cetaceans and pinnipeds can be scoped out.

			In addition, the Inspectorate considers that there is potential for likely significant cumulative effects from visual disturbance because of the presence of vessels and equipment. The applicant's attention is drawn to JNCC's comment (Appendix 2 of this Opinion) in this regard. An assessment of disturbance effects should be provided, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The Inspectorate comments on assessment method are set out at ID 4.5.15 of this Opinion.
4.54	Table 22-10	Underwater noise changes from presence of project vessels and equipment affecting otter and marine turtles during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out on the basis that otter and turtles are not likely to be present in the study area, and exposure to noise would be extremely limited. The Inspectorate agrees that this matter can be scoped out of further assessment, noting that impacts to otter from the onshore scheme would be separately assessed in the biodiversity ES chapter.
4.55	Table 22-10	Collision with project vessels affecting cetaceans and pinnipeds during construction, operation and decommissioning	The Scoping Report states that key factors contributing to collision are presence of mammals and vessels in the same area and vessel speed. It commits to vessel speeds being below the 14 knots at which fatal collisions occur and use of existing shipping routes. Reference is made to an assessment carried out for EGL3 and EGL4, which showed a high level of shipping activity in the region and that animals would be habituated to these movements but is not specified as to what increase from baseline is proposed for vessel movements other than confirming that vessel use would reduce during operation. It does not present evidence about risk of injury as opposed to fatality. The Inspectorate does not have sufficient justification to agree that this matter can be scoped out, and notes JNCC comments (Appendix 2 of this Opinion) regarding the need to assess increased risk from collision, including from impacts other than fatality. The ES should clearly describe the likely number of vessels to be used and provide an assessment of collision impacts or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.

4.56	Table 22-10	Collision with project vessels affecting otter and marine turtles during construction, operation and decommissioning	The Scoping Report seeks to scope this matter out on the basis that otter and turtles are not likely to be present in the study area, and exposure to vessels would be extremely limited. The Inspectorate agrees that this matter can be scoped out of further assessment, noting that impacts to otter from the onshore scheme would be separately assessed in the biodiversity ES chapter.
4.57	Table 22-10	Electromagnetic changes or barrier to species movement from presence of cables affecting cetaceans, pinnipeds, marine turtles, otter and relevant designated sites during construction, operation and decommissioning	The Inspectorate agrees that there would be no impact pathway for electromagnetic changes during construction and decommissioning as the cable would not be operational. This matter can be scoped out of further assessment for these phases. Regarding the operational phase, the Scoping Report describes published studies and literature, as well as modelling forming part of the published preliminary environmental information report (PEIR) for EGL3 and EGL4 that shows rapid attenuation of EMF to background levels within 20m. It states that change of the magnetic field would therefore be localised and would only temporarily affect sensitive species as they cross or pass alongside cables. Based on the information provided, the Inspectorate agrees that this matter can be scoped out of further assessment.
4.58	Table 22-10	Temperature increase from the presence of cables affecting cetaceans, pinnipeds, marine turtles, otter and relevant designated sites during construction, operation and decommissioning	The Inspectorate agrees that there would be no impact pathway during construction and decommissioning as the cable would not be operational. This matter can be scoped out of further assessment for these phases of the proposed development. Regarding operation, the Scoping Report states that calculations in the published PEIR for EGL3 and EGL4 concluded that seabed temperatures immediately above the cables are estimated at 13°C to 14°C compared to a seabed temperature of 12°C, described as a low-level localised increase that is undetectable against natural fluctuation in the surrounding water column. The Inspectorate agrees that this matter can be scoped out of further assessment based on the information presented.
4.59	Table 22-10	Accidental spills from the presence of project vessels and equipment affecting cetaceans,	The Inspectorate is content to scope this matter out noting the legal requirements upon vessels to manage any accidental spills, and that relevant measures to comply with legislation will be outlined in management plans to be submitted with the DCO application.

		pinnipeds, marine turtles, otter and relevant designated sites during construction, operation and decommissioning	
4.5.10	Table 22-10	Visual disturbance from the presence of project vessels and equipment affecting cetaceans, pinnipeds, marine turtles and otter during construction, operation and decommissioning	The Scoping Report states that pinnipeds are more sensitive to disturbance when hauled out and describes studies that conclude that a safe boat distance for harbour and grey seals is 200m, with the nearest haul out to the proposed development being 9.8km distant (Donna Nook). It states that species are already habituated to the presence of vessels including large ships and ferries in the study area, and that project vessels would be transient and temporary, increasing shipping from the baseline condition briefly. The Inspectorate agrees that effects to cetaceans and marine turtles can be scoped out of further assessment. However, there is insufficient justification regarding pinnipeds and otter. Whilst the Inspectorate notes the justification for project vessels, it is unclear if there are other activities at landfall or in the intertidal area that could result in visual disturbance to seal haul-out sites or otter using intertidal areas. The ES should clarify this and provide an assessment or otherwise demonstrate an absence of likely significant effects with evidence of agreement from relevant consultation bodies.
4.5.11	Table 22-10	Transboundary impacts to cetaceans, pinnipeds and relevant designated sites during construction, operation and decommissioning	The Inspectorate cannot agree to scope this matter out until it has undertaken its own transboundary screening.
4.5.12	Table 22-10	Underwater noise changes from UXO clearance affecting marine turtles and otter during construction,	The Scoping Report seeks to scope this matter out for construction on the basis that otter and turtles are not likely to be present in the study area, and that UXO clearance is not likely to be required in the intertidal area due to use of HDD as the installation method. For operation and decommissioning, it states that there would be no requirement for UXO clearance. The Inspectorate agrees that this matter can be scoped out of further

		operation and decommissioning	assessment, noting that impacts to otter from the onshore scheme would be separately assessed in the biodiversity ES chapter.

ID	Ref	Description	Inspectorate's comments
4.5.13	Section 22.7 and para 22.8.2	Project-specific marine mammal and turtle studies and surveys	The Scoping Report states that no specific additional studies are proposed given the extensive information available from public data sources. Paragraphs 22.7.3 to 22.7.4 describe proposed survey work, which would comprise recorded sightings during geophysical survey for the proposed development and EGL3. The Inspectorate is content with this approach.
4.5.14	Para 22.7.2	Underwater noise modelling	It is proposed to use underwater noise modelling completed for EGL3 to inform the assessment, with the Scoping Report stating that the proposed development has the same cable specification, configuration and rating, water depth and length as EGL3 and the cable routes run in parallel. The Inspectorate is content with this approach but advises that the ES should include the justification as to why the EGL3 modelling is relevant to the proposed development. The ES should include evidence that the EGL3 modelling has been discussed and agreed with relevant consultation bodies. The applicant's attention is drawn to JNCC's comments (Appendix 2 of this Opinion) in this regard.
4.5.15	N/A	Assessment of Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS)	The Scoping Report does not refer to assessment of PTS or TTS other than noting in Table 20-2 that this is a policy requirement in NPS EN-3. The ES should present the TTS impact ranges and the number of animals predicted to be at risk from impact pathways scoped in for assessment of underwater noise change. The applicant should seek to agree the approach to the assessment of PTS and TTS-onset on marine mammals with the relevant consultation bodies.
4.5.16	N/A	Guidance for underwater noise	The applicant's attention is drawn to the comments of JNCC and NE (Appendix 2 of this Opinion) regarding updated guidance documents for assessment of underwater noise, including UXO clearance. The ES should be informed by the latest guidance.

4.5.17	N/A	Harbour seal of Teesmouth and Cleveland Coast SSSI	Noting the advice of NE (Appendix 2 of this Opinion), the Inspectorate advises that this receptor can be scoped out of further assessment based on the proposed development being located more than 50km from the designated site, which is beyond the receptor's foraging distance.
4.5.18	N/A	Mitigation for Southern North Sea SAC	The ES should set out how significant cumulative effects to qualifying features of the Southern North Sea SAC would be mitigated, based on a thorough assessment of the impact pathways including from simultaneous noisy construction activities. The Inspectorate advises that an outline site integrity plan should be submitted as part of the ES. Effort should be made to agree the approach with relevant consultation bodies.

4.6 Shipping and Navigation

(Scoping Report Section 23)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	Table 23-7	Interference with marine Navigational equipment during cable lay for all vessel types during construction and decommissioning	The Scoping Report states that there is no risk of electromagnetic forces from the cable that are likely to cause interference with marine navigation equipment during the construction and decommissioning and proposes to scope out this matter. The Inspectorate agrees that significant effects during construction and decommissioning are unlikely and is content for this matter can be scoped out.

4.7 Commercial Fisheries

(Scoping Report Section 24)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	Table 24-12	Changes in distribution of target species during: • seabed preparation • cable burial / trenching • installation of cable protection • cable removal on commercial fisheries during construction, operation and decommissioning	The Scoping Report explains that this matter will be covered within the Fish and Shellfish assessment and where no significant effects are reported, this matter too will be scoped out of this aspect. The Scoping Report states that where significant effects are reported for this matter within the within the Fish and Shellfish assessment, then it will be scoped into this aspect. The Inspectorate is content with this approach.
4.7.2	Table 24-12	Temporary increase and deposition of suspended sediments during: • seabed preparation • cable burial / trenching	The Scoping Report states that the construction methods for both EGL3 and EGL4 and the proposed development will be the same. It also refers to the conclusion of the preliminary assessment for the EGL3 and EGL4 which found that this matter will not be significant on mobile gear as this equipment is unlikely to be in one area long enough for suspended sediment to settle. On the basis that the ES confirms that the conclusions from this preliminary assessment for EGL3 and EGL4 remains valid for this matter, the Inspectorate agrees that this matter can be scoped out.

		• installation of cable protection • cable removal on mobile gear during construction, operation and decommissioning	

4.8 Other Marine Users

(Scoping Report Section 25)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	Table 25-15	Damage to existing infrastructure or assets during: • seabed preparation • cable burial and trenching • anchoring / jackup legs • cable removal on oil and gas, power and telecommunication cables, OWE and CCS during construction, operation and decommissioning	The Scoping Report states that pre-works surveys will be undertaken to locate all existing infrastructure and this will inform the approach to either avoid these existing assets or use of external cable protection. Furthermore, the Scoping Report explains that individual crossing agreements will be reached before any work commences and it also refers to legal measures in place that would ensure effects are not significant. On this basis, the Inspectorate agrees that significant effects are not likely to occur and this matter can be scoped out of further assessment. However, the ES should contain a description of the potential crossing designs and consideration of the implications for other aspects.
4.8.2	Table 25-15 and section 4.5	Occupancy of seabed – below or on seabed due to the presence of cables and cable protection on: • oil and Gas	During construction, the Scoping Report states that there is no impact pathway for this phase of the proposed development and that the offshore construction programme is anticipated to be 5 years. There is potential for presence of underground cabling for the proposed development to be in situ for a sustained period of time before the operational phase commences. In the event that the cables and cable protection have been laid and

		• aggregates • disposal sites • power and telecommunication cables • OWF • CCS during construction and decommissioning	are in place for a proportion of the construction period, these should be factored into the (scoped in) operational assessment as impacts are likely to be similar and continuous. The Inspectorate agrees that this can be scoped out during decommissioning as the other service providers can avoid, cut or remove the service cables during this phase if the proposed development's cables remain in situ.
4.8.3	Table 25-15	Visual effects during: • seabed preparation • cable burial and trenching • anchoring / jackup legs • cable removal • decommissioning activities on recreational vessels during construction, operation and decommissioning	The Scoping Report states that the existing maritime traffic profile within the Study area is unlikely to change during the three phases of the proposed development and therefore significant effects are not anticipated. The Scoping Report also states that during cable installation, construction activity would be moving away from the landfall and not static and so impacts are likely to be localised and temporary in duration. Paragraph 23.4.12 of the Scoping Report does not specify recreational vessels, but Plate 23-1 indicate that recreational vessels represent 0.4% of the 36,714 total AIS vessel tracks recorded during 2019 in the Study Area. For these reasons, the Inspectorate agrees that this matter can be scoped out.
4.8.4	Table 25-15	Interaction with aircraft using Practise and Exercise Areas (PEXA)	The Scoping Report states that activities, vessels and equipment used throughout all phases of the proposed development will not provide a pathway for interaction with low flying military aircraft utilising the airspace above the proposed development.

		on all vessel related activities associated with the MoD during construction, operation and decommissioning	In their consultation responses provided in Appendix 2 of the Opinion, the MoD observe that other air to surface military training activities involving military aircraft may be affected and therefore displace military training activities. On this basis, the Inspectorate disagrees that this matter can be scoped out. The ES should provide an assessment of likely significant effects or provide justification, including agreement with the relevant consultees, for why these would not occur.
4.8.5	Table 25-15	Damage to existing infrastructure or assets, occupancy of seabed – Below or on seabed and visual effects during: • seabed preparation • cable burial and trenching • anchoring / jackup legs • cable removal • decommissioning activities on aquaculture sites during construction, operation and decommissioning	The Inspectorate agrees that this matter can be scoped out on the basis that no aquaculture sites have been identified within the study area.
4.8.6	Table 25-15 and	Transboundary impacts during: • seabed preparation	Figure 23-3 of the Scoping Report shows the existing infrastructure and agreements that could interact with the proposed development. The Scoping Report seeks to scope this matter out of further assessment on the grounds that crossing agreements would need to be set up with new and existing cable and pipeline owners prior to any work commencing.

	Figure 23-2	• cable burial and trenching • anchoring / jackup legs • cable removal on oil and gas, power and telecommunication cables, OWF and CCS during construction, operation and decommissioning	The Inspectorate notes that it has an ongoing duty in relation to consideration of transboundary effects and will undertake a separate transboundary screening exercise on behalf of the SoS under Regulation 32 of the EIA Regulations following adoption of the Scoping Opinion. On this basis, the Inspectorate is unable to agree this matter out from further assessment.

ID	Ref	Description	Inspectorate's comments
4.8.7	Chapter 25	MoD danger areas	The applicant is encouraged to ensure that all MoD activity that occurs within these areas is accounted for in the ES. The applicant's attention is directed to the MoD's response in Appendix 2 of this Opinion.

4.9 Marine Archaeology

(Scoping Report Section 26)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
4.9.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
4.9.2	Table 26-7 and para 26.6.4	Micro-siting	Scoping Report Table 26-7 identifies micro siting as a mitigation measure but this is not included in the measures set out in paragraph 26.6.4. For clarity, the ES should set out if and where micro siting is intended to mitigate effects and how this is secured through the DCO.

5. ENVIRONMENTAL ASPECT COMMENTS – PROJECT WIDE ASPECTS

5.1 Greenhouse Gases

(Scoping Report Section 28)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
5.1.1	Table 28-7	Emissions from the disposal of waste during construction	The Scoping Report proposes to scope out this matter on the basis that emissions from the disposal of waste materials are not expected to give rise to significant effects, as the majority of waste generated is anticipated to be of an inert type. The Inspectorate agrees that this matter can be scoped out of further assessment. The Inspectorate considers however that the ES or application documents should include details on the management of any non-inert i.e. non-hazardous or hazardous waste generated.
5.1.2	Table 28-7	Emissions from maintenance, repair, replacement and refurbishment during operation	The Inspectorate agrees that emissions from maintenance, repair, replacement and refurbishment of activities would be minimal and are unlikely to lead to significant effects. On this basis the Inspectorate agrees that this matter can be scoped out of further assessment
5.1.3	Table 28-7	Emissions from operational energy use	The Inspectorate agrees that this matter can be scoped out of further assessment on the basis that the operational phase would require limited energy use as the operation is for the transmission of electricity.
5.1.4	Table 28-7	Emissions from operational water use	The Inspectorate agrees that this matter can be scoped out of further assessment on the basis of the nature of the development meaning operational water use would be minimal.

51.5	Table 28-7	End user emissions during operation	The Inspectorate agrees that this matter can be scoped out on the basis the operational phase would require limited energy or other resource use as the operation is for the transmission of electricity.
51.6	Table 28-7	Emissions during decommissioning and Transport and disposal of end of life materials	The Scoping Report proposes to scope out noting that the process of decommissioning is far in the future (60 years), and specific of decommissioning are not known in terms of material volume or available disposal routes. The Inspectorate is in agrees that this matter can be scoped out of the ES. The ES should however indicate how it is secured through the DCO that an assessment of decommissioning emissions at a later date will be undertaken.

ID	Ref	Description	Inspectorate's comments
51.7	N/A	N/A	N/A

5.2 Scoped out Aspects

(Scoping Report Section 29)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
521	Section 29.2	Materials and Waste	The Scoping Report proposes to scope out this matter on the basis that existing sources of material will be used, and options for the recycling of temporary materials such as those used to construct haul roads and site compounds will be considered. The Inspectorate agrees that this matter can be scoped out. The ES however should provide estimate of waste quantities and explain how the capacity at waste sites has been considered if scoping out significant effects. A site waste management plan is also proposed to be provided, the Inspectorate notes this should be secured within the DCO.
522	Section 29.3	EMF	The Scoping Report proposes to scope out an assessment of associated with the generation of EMF during operation on the basis that the Onshore Scheme will ensure that policies and procedures are in place at the design phase to ensure that all equipment will comply with public EMF exposure limits. On the basis of the information presented within the Scoping Report, which states that information and demonstration of compliance with exposure guidelines will be provided as a separate document, the Inspectorate is in agreement that an assessment of electromagnetic fields can be scoped out of the ES.
523	Section 29.4 and Appendix 29a	Major accidents and disasters	The Scoping Report proposes to scope this matter out by listing potential sources of major accidents and disasters and providing an assessment of why they are unlikely to result in significant effects, or detailing where they would be assessed in other chapters. On the basis of the assessment provided, the Inspectorate is in agreement that an assessment of major accidents and disasters can be scoped out of the ES, provided that the assessments noted to be required in other chapters such as flood risk are provided.

			The ES should also include the summary assessment or justification given in the Scoping Report for clarity.
524	Section 29.5	Climate Change Resilience: - In-Combination Climate Change Impact (ICCI) Assessment – - Climate Change Resilience (CCR) Assessment	The Scoping Report proposes to scope this matter out as the infrastructure is predominately underground and therefore not subject to climate change impacts, or where above ground or in areas of potential coastal erosion, would be designed to factor in climate change consequences such as flood risk. The Inspectorate agrees and that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
525	Para 29.2.7	Certainty over reuse of excavated soils	The Scoping Report states that surplus soil gained from excavations will be reused within the site. Given that the proposed development predominately consists of underground infrastructure, the ES should ensure to clarify how it can be ensured that all material is reused. If the soil is proposed to be utilised for features such as bunds for landscape, visual or noise mitigation, the ES should also ensure to consider the effects of this.

5.3 Cumulative Effects

(Scoping Report Section 30)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
53.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
532	Table 30-3	Reference to PINS advice	The Inspectorate notes that this table refers to advice note 17. The applicant should be aware that this has been withdrawn and replaced by the relevant advice page.
533	Para 30.4.13	Criteria for inclusion of Town and Country Planning Act Developments	The Scoping Report does not contain a legible reference to the criteria used to determine whether TCPA applications other than those in category 10(b) would be included, and as such the criteria are not considered to be listed. The ES should present the criteria used and a justification for this. The ES should also consider other schedule 2 development other than those in category 10 (B).
534	Para 30.1.6	Impact pathways	The Scoping Report considers two types of cumulative effects, however it does not set out the impact pathways for each aspect that would be considered for the cumulative effects assessment. Given the number of consented and proposed developments alongside existing infrastructure in the study area, the ES should provide a justification how each impact pathway is determined and assessed in the cumulative effects assessment. The ES should also consider impact pathways scoped out for effects from the proposed development as these could incrementally result in significant cumulative effects.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

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

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council	Aby With Greenfield Parish Council
	Alford Town Council
	Anderby Parish Council
	Bilsby and Farlesthorpe Parish Council
	Chapel St. Leonards Parish Council
	Hogsthorpe Parish Council
	Huttoft Parish Council
	Mablethorpe & Sutton Town Council
	Maltby le Marsh Parish Council
	Mumby Parish Council
	Swaby, Haugh & South Thoresby Parish Council (includes Haugh Parish)
	Willoughby with Sloothby and Claxby St. Andrew Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
Natural England (Offshore Wind Farms)	Natural England (Offshore Wind Farms)

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Forestry Commission	The Forestry Commission East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Historic Buildings and Monuments Commission for England (known as Historic England) (offshore only)	Historic England
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime and Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	Maritime and Coastguard Agency - North East England
The relevant internal drainage board	Lindsey Marsh Drainage Board
Trinity House	Trinity House
The relevant Highways Authority	Lincolnshire County Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
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 Coal Authority	Mining Remediation Authority

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The Crown Estate Commissioners	Crown Estate Scotland
The relevant police authority	Lincolnshire Police and Crime Commissioner
The relevant ambulance service	East Midlands Ambulance Service NHS Trust
The relevant fire and rescue authority	Lincolnshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

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

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Lincolnshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
Railways	National Highways Historical Railways Estate
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

STATUTORY UNDERTAKER	ORGANISATION
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Northern Powergrid (Northeast) Limited
	Advanced Electricity Networks Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	Diamond Transmission Partners Hornsea One Limited
	Diamond Transmission Partners Hornsea Two Limited
	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

STATUTORY UNDERTAKER	ORGANISATION
	Scottish Hydro Electric Transmission Plc
	SP Transmission Plc
	Triton Knoll OFTO Ltd
The relevant electricity interconnector with CPO Powers	Aminth Energy Ltd
	National Grid North Sea Link Limited
	National Grid Viking Link Limited
	Nu-Link Interconnector UK Ltd

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

LOCAL AUTHORITY
Boston Borough Council
Cambridgeshire County Council
East Lindsey District Council
Leicestershire County Council
Lincolnshire County Council
Norfolk County Council
North East Lincolnshire Council
North Kesteven District Council
North Lincolnshire Council
North Northamptonshire District Council
Nottinghamshire County Council
Peterborough City Council
Rutland County Council
West Lindsey 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
The Marine Management Organisation <i>This response was received within the statutory deadline but was omitted from Appendix 2 at the time the Scoping Opinion was adopted due to a technical error. It has since been added to Appendix 2 and the Applicant has been made aware of this response on 04 November 2025.</i>

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:
Alford Town Council
Anglian Water
Bilsby and Farlesthorne Parish Council
East Lindsey District Council
Environment Agency
Forestry Commission
Health and Safety Executive
Historic England
Huttoft Parish Council
Joint Nature Conservation Committee
Lincolnshire County Council
Marine Management Organisation
Maritime & Coastguard Agency
Mining Remediation Authority
Ministry of Defence
National Air Traffic Services
National Highways
Natural England
Norfolk County Council
Nottinghamshire County Council
Outer Dowing Offshore Wind
Trinity House

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:

UK Health and Security Agency

West Lindsey District Council

Executive summary and overall position

Alford Town Council (ATC) recognises the national need for timely grid reinforcement set out in the updated National Policy Statements EN-1 and EN-5.

However, the scoping must ensure a robust assessment of reasonable alternatives and minimisation of harm, especially in and around the Lincolnshire Wolds and the historic market town of Alford.

Alford Town Council held a planning committee meeting on Tuesday 16th September, which was attended by members of the public, who were able to voice their concerns regarding the proposal by National Grid. Alford Town Council has listened to the concerns and has embedded them into this stakeholder request where appropriate.

Therefore, Alford Town Council support comprehensive scoping for:

A thorough alternatives appraisal (strategic and route-level) including subsea/HVDC and undergrounding;

A full cumulative assessment with other National Grid schemes affecting Lincolnshire.

Scoping request 2.1 – Study area & receptors:

Alford Town Council as a major Stakeholder on behalf of the communities of Alford it represents and the surrounding parishes who do not have a robust governmental infrastructure present in order to respond accordingly request that National Grid embark on the following:

Alford Town Council have an information need for National Grid to have a study area wide enough to capture intervisibility between the OHL and:

Alford Five-Sailed Windmill (Grade I) and its curtilage assets;

Alford Manor House (Grade II*) and grounds;

Alford Conservation Area and townscape viewpoints;

Medieval ridge-and-furrow land, deserted villages, and ancient woodlands; Such as the DMV at Tothby Manor (off Tothby Lane, Alford) and not noted in NG's Scoping Report

The Lincolnshire Wolds AONB setting and approach corridors;

Tothby Manor

Nearby heritage including windmills at Burgh-le-Marsh.

Scoping request 2.2 – Local Economy and Tourism

The ES must include a detailed socio-economic chapter quantifying potential impacts of the scheme on Alford's and East Lindsey's visitor economy. This should consider:

Construction traffic and severance effects on access to heritage attractions (Alford Five-Sailed Windmill, Alford Manor House, Spilsby Sessions House, and Lincolnshire Wolds gateways).

Noise, dust, and visual intrusion, and their impact on Alford's attractiveness as a visitor destination.

Event disruption, with risks to seasonal tourism peaks, heritage open days, festivals, and cultural programmes.

Agriculture and Rural Economy Impacts

Alford Town Council wishes to highlight the significant detrimental effects that construction-related traffic associated with the proposed National Grid project could have on local agricultural activity and the wider rural economy.

Agriculture in the Alford area remains a critical land use and economic driver, supporting not only direct farming operations but also a wide range of associated supply-chain businesses including seed and grain merchants, fertiliser and chemical suppliers, agricultural engineers and technicians, hauliers, and specialist contractors. This agricultural supply chain underpins both local employment and regional food security.

The proposed increase in construction traffic, particularly heavy goods vehicles (HGVs), coincides with the peak farming calendar (July–October) when harvesting, ploughing, and seed drilling take place. At these times, agricultural machinery and haulage vehicles are in intensive use and require reliable, safe, and timely access to fields, storage facilities, and markets. Additional traffic congestion, road closures, diversions, or delays will risk serious disruption to these essential seasonal operations.

Furthermore, any sustained impact on the efficiency and viability of farming businesses will have a direct knock-on effect on dependent industries and services. Decline in primary agricultural productivity leads to contraction in the supporting tertiary sectors (e.g. equipment engineers, crop input suppliers, transport contractors). This would undermine the resilience of the rural economy and could have long-term negative social and economic consequences for the community.

Scoping request 2.3 Request for Assessment:

We request that the Environmental Statement explicitly assesses:

The potential seasonal impacts of construction traffic on farm operations between July and October.

The cumulative risk to agricultural supply-chain businesses if farming activities are delayed, disrupted, or economically undermined.

Mitigation measures to ensure that agricultural and rural economy impacts are fully recognised, minimised, and managed through both construction planning and traffic management strategies.

Scoping request 2.4 Particular attention must be given to the impact on projects supported by the Government's Levelling Up Fund (LUF):

Alford Manor House (recipient of LUF funding to enhance its visitor offer and educational infrastructure).

Spilsby Sessions House (recipient of LUF funding for cultural regeneration).

Both projects are subject to delivery conditions tied to visitor numbers, public engagement, and economic outputs. Any loss of accessibility or decline in visitor experience caused by the National Grid project could reduce visitor numbers and jeopardise delivery of these outcomes, thereby putting at risk the effective use of public money.

The Levelling Up White Paper (2022) set twelve "missions" to be achieved by 2030, including:

Mission 1 – Productivity, pay, jobs and living standards: raising living standards across the UK, particularly in deprived areas.

Mission 4 – Pride in Place: restoring a sense of community, local identity, and heritage pride.

Mission 7 – Health and wellbeing: improving health disparities linked to environmental quality.

Mission 9 – Local leadership: empowering local leaders to drive regeneration.

Alford Town Council feels that the above mentioned missions will be directly impacted with the National Grid proposals and that they should be included in the Scoping.

Heritage-led regeneration projects in Alford and Spilsby are directly aligned with these missions by:

Creating local employment and training opportunities in tourism, hospitality, and cultural industries.

Enhancing community identity and pride in heritage assets (Windmill, Manor House, Sessions House).

Improving wellbeing and visitor access to cultural amenities.

Strengthening local leadership and partnership working through town and district councils.

If construction disruption undermines visitor quotas or event delivery, these projects may fail to meet their monitoring and evaluation targets under the LUF programme. This risks reputational harm for both local authorities and central government, contradicting the Levelling Up agenda and reducing public confidence in its outcomes.

The ES including Scope Requirement 2.2 must therefore include:

Model potential losses in visitor numbers, tourism spend, and local employment caused by NG's project.

Explicitly assess the risk of non-delivery of Levelling Up objectives linked to LUF- funded heritage projects.

Propose robust mitigation measures and/or community benefit contributions to safeguard government investment and ensure that Levelling Up outcomes for East Lindsey are protected.

Policy framework to be applied

Alford Town Council request that the ES should demonstrate accordance with EN-1 (Overarching NPS) and EN-5 (Electricity Networks), especially policies on need, alternatives, and design.

The framework should be published in all formats including audio files.

Scoping request 3.1 – NPS Compliance Matrix

Alford Town Council requests that the Environmental Statement (ES) must include a detailed compliance matrix mapping the scheme and all reasonable alternatives against the requirements of the relevant National Policy Statements (NPS), specifically EN-1 (Overarching Energy NPS) and EN-5 (Electricity Networks NPS).

With considerations for the following points:

This obligation arises from several legal and policy requirements:

Planning Act 2008 (Sections 104–106): The Secretary of State must decide Nationally Significant Infrastructure Projects (NSIPs) in accordance with designated NPSs unless certain exceptions apply. Therefore, the ES must provide sufficient information to demonstrate compliance with EN-1 and EN- 5.

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Regulation 14(2)(f): Requires “a description of the relevant features of the environment likely to be significantly affected... and the measures envisaged to avoid, prevent, reduce or offset significant adverse effects.” A compliance matrix is necessary to ensure environmental obligations in the NPS are properly addressed.

Alford Town Council wish to highlight the following amendments to the Regulations:
NPS EN-1 (Overarching Energy Policy, 2023 update):

Paragraph 4.2.6: applicants must demonstrate “good design,” including consideration of functionality, sustainability, and sensitive siting.

Paragraph 4.2.8: requires that adverse impacts are minimised through design and mitigation.
Paragraph 4.2.11: applicants should explain how alternatives have been considered and ruled out.
NPS EN-5 (Electricity Networks):

Paragraph 2.8.8: requires detailed consideration of undergrounding where overhead lines would cause “serious adverse landscape and visual impacts.”

Paragraph 2.8.9: specifically notes that in Areas of Outstanding Natural Beauty (AONB) and other designated landscapes, undergrounding is a legitimate and often preferable option despite higher costs. Particularly in the context of DEFRA Guidance, issued 15 Dec 2024, on The Countryside and Rights of Way Act 2000, s.85 (CRoW) (as amended by s.245 of LURA 2023)

CRoW as you are aware imposes a duty on National Grid to ‘seek to further’ the purpose of conserving and enhancing the natural beauty of the Wolds (AONB) when exercising or performing any functions in relation to, or so as to affect, land in and overlooked by an AONB. The Guidance makes clear that the duty applies to functions performed outside the relevant designation boundary which affect the designated landscape. Similarly, paragraph 5.10.8 of EN-1 (Overarching National Policy Statement for Energy, s.9(8) of the Planning Act 2008) confirms that the duty applies to projects which are located outside the designated area, but which may have impacts within them. As such, the duty applies in respect of the Project.

Alford Town Council requires National Grid to demonstrate consideration as to whether a project is consistent with the purpose of conserving and enhancing the natural beauty of the Wolds AONB and, if there is a conflict, a consideration of whether its promotion would be in accordance with the duty. If there is a conflict, consideration needs to be given to whether the project is nevertheless justified in the circumstances, with reference to, for example, the extent and severity of the conflict, any alternative solutions, mitigation and any compensation or enhancements.

Paragraph 5.10.8 of EN-1 goes on to state that such projects should be sensitively designed taking account of various siting, operational and other relevant constraints and also that the Secretary of State should be satisfied that the measures which seek to further the purpose of the designation are sufficient, appropriate and proportionate to the type and scale of development proposed. Alford Town Council requests within this Scoping request for National Grid to demonstrate how they have mitigated against this.

Paragraph 2.8.10: requires applicants to justify overhead alignments with transparent evidence on cost, environmental impact, and technical feasibility. Alford Town Council requests National Grid to justify this in within this Scoping request.

Alford Town Council request the compliance matrix should therefore:

Present a side-by-side tabular assessment of each routeing and design option against relevant EN-1 and EN-5 paragraphs.

Identify where the scheme complies, partially complies, or does not comply, with clear reasoning.

Reference supporting evidence (e.g., LVIA, heritage assessments, alternatives analysis).

Highlight any policy gaps or areas of potential non-compliance for the Examining Authority's scrutiny.

This approach ensures that the application is legally robust, transparent, and capable of proper examination under the Planning Act 2008 decision framework.

Alford Town Council also requests that it is available in audio format as they have two elected members of Council who are registered blind.

Scope 4.0 -Alternatives, Design, and "Good Design" (Including Undergrounding/HVDC)

Alford Town Council requests that the Environmental Statement (ES) must contain a transparent and scientifically robust alternatives assessment in line with statutory requirements and national policy guidance.

Under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 14(2)(d)), developers are legally obliged to provide:

“A description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

In addition, National Policy Statement (NPS) EN-1 (Overarching Energy NPS) and EN-5 (Electricity Networks NPS) require that:

Promoters demonstrate how “good design” has been applied, balancing functionality, sustainability, cost, and visual/landscape considerations.

Particular weight must be given to alternatives in sensitive locations such as the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB), heritage landscapes, and historic townscapes such as Alford. EN-5 specifically acknowledges that undergrounding or partial- undergrounding of overhead lines should be fully considered where it would substantially reduce adverse landscape, heritage, or community impacts.

Alford Town Council has not seen any substantial evidence that National Grid has carried out or presented a robust alternatives appraisal. At recent engagement events, interactions with National Grid representatives have been unsatisfactory, lacking in both transparency and scientific/technical substantiation. Assertions have been made regarding the infeasibility of undergrounding or subsea alternatives without providing the detailed engineering, environmental, or cost-benefit analysis required by legislation.

Therefore, the ES must:

Present a multi-criteria assessment of routeing and technology alternatives (overhead lines, underground cables, subsea/HVDC reinforcements, and hybrid solutions).

Clearly set out the technical, environmental, and economic factors considered, with evidence from independent or verifiable studies.

Demonstrate how the scheme delivers “good design” under EN-1 and EN-5, including landscape integration, heritage protection, community wellbeing, and sustainability.

Provide side-by-side visual and environmental comparisons of overhead and underground/subsea options in sensitive areas around Alford and the AONB.

Document why certain options have been rejected, with explicit reference to environmental outcomes, not just cost.

Without such evidence, the Council considers the project’s alternatives assessment to be incomplete and non-compliant with both the EIA Regulations 2017 and the relevant National Policy Statements.

Scoping request 4.1 – Alternatives Methodology

The Environmental Statement (ES) must provide a comprehensive and evidence-based multi-criteria analysis of alternatives, as required under Regulation 14(2)(d) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which obliges developers to describe the reasonable alternatives studied and indicate the environmental reasons for their selection.

In particular, the ES should:

Explicitly test undergrounding and subsea options in and around the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB), and the heritage-sensitive settlements of Alford, Bilsby, Rigsby, and Woodthorpe.

Include photomontages and Zone of Theoretical Visibility (ZTV) analysis comparing overhead line (OHL) scenarios with undergrounded cable sections, enabling objective visual and landscape comparison.

Alford Town Council seek reassurance and documented proof from National Grid that National Policy Statements EN-1 and EN-5, have been adhered to and these include but are not limited to the following statutory requirements:

Careful consideration of alternative technologies and alignments, particularly in sensitive landscapes and historic environments.

Demonstration of “good design”, balancing functionality, cost, and environmental performance.

Specific recognition in EN-5 that undergrounding should be given detailed consideration in or adjacent to nationally sensitive landscapes such as AONBs.

Present a multi-criteria decision analysis (MCDA) framework, scoring each alternative against weighted factors such as:

Landscape and visual impact (using GLVIA3-compliant methodology).

Heritage and setting impacts (using Historic England guidance).

Ecological and biodiversity effects (habitats, species, ancient woodlands).

Agricultural land and soils.

Carbon emissions and lifecycle energy losses.

Technical feasibility and reliability.

Economic cost and long-term maintenance.

Incorporate peer-reviewed scientific evidence on the comparative performance of overhead, underground, and subsea high-voltage technologies, including thermal dissipation, electromagnetic fields (EMFs), soil heat transfer, and repair times.

Provide transparent cost–benefit analysis: not only financial but also natural capital and social value accounting, to ensure that economic assessments include avoided heritage damage, tourism impacts, and community wellbeing.

Without such a structured methodology, Alford Town Council will consider the alternatives appraisal risks being incomplete and non-compliant with both the EIA Regulations 2017 and the requirements of NPS EN-1 and EN-5.

Scoping Request 5.0 - Landscape & visual impact assessment (LVIA)

Alford Town Council request that ES must contain a comprehensive Landscape and Visual Impact Assessment (LVIA), undertaken in accordance with established professional guidance and legislative duties.

Alford Town Council request that the ES LVIA must follow GLVIA3 and provide agreed wirelines/photomontages in all accessible formats including audio with maps being produced in A0 size a minimum.

Scoping request 5.0 – Landscape and Visual Impact Assessment (LVIA)

These requirements must include and present the findings in all accessible formats as detailed above:
Methodology:

LVIA must follow the Guidelines for Landscape and Visual Impact Assessment (GLVIA3, Landscape Institute & IEMA, 2013), which represent the industry standard for assessing landscape and visual effects. Photomontages, wirelines, and Zone of Theoretical Visibility (ZTV) analysis must be prepared in accordance with the Landscape Institute's Technical Guidance Note 06/19 (Visual Representation of Development Proposals), ensuring accuracy, transparency, and reproducibility.

Legislative and Policy Context:

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 14(2)(f)): requires identification of "significant effects" on the environment, including landscape and visual receptors, and measures to avoid, reduce, or offset those effects. Alford Town Council wish National Grid to demonstrate that these factors have been investigated, documented and mitigated against with a clear systems approach, including temporal impact on the local area.

National Policy Statement (NPS) EN-1 (Overarching Energy Policy):

Paragraph 4.2.6: requires applicants to demonstrate "good design" that integrates into the environment.

Paragraph 5.9.8: requires consideration of impacts on nationally protected landscapes, such as Areas of Outstanding Natural Beauty (AONBs).

NPS EN-5 (Electricity Networks):

Paragraphs 2.8.8–2.8.9: require detailed consideration of undergrounding where OHLs would cause serious adverse landscape or visual impacts, particularly in AONBs.

Study Area requested within Scoping request 5.0:

The LVIA study area must be wide enough to capture intervisibility and cumulative views across:

Alford Five-Sailed Windmill (Grade I). Alford Manor House (Grade II*).

Tothby Manor and other heritage settings. Alford Conservation Area.

Medieval ridge-and-furrow land and ancient woodlands. Lincolnshire Wolds AONB and approach corridors.

Sequential views from nearby heritage windmills (e.g. Burgh le Marsh).

Alford Town Council request the following assessment deliverables:

Wirelines and photomontages from agreed viewpoints, including heritage assets, town gateways, and PROWs.

Daytime and night-time assessments, including substation lighting and dark skies impacts.

Cumulative assessment showing combined/sequential views with other grid projects (Grimsby–Walpole, Eastern Green Link).

Transparent presentation of mitigation measures, including landscaping, screening, or undergrounding, with clear indication of residual effects.

Engagement:

Alford Town Council requires early consultation by National Grid to agree representative viewpoints, this must be presented with evidence unbiased fact based information, in order for the community and Council members to be able to have an informed and scientific approach rather than an emotive one .
Alford Town Council

There should be a clear systems engineering audit trail must be provided to show how community feedback has shaped viewpoint selection and mitigation proposals.
Community Engagement Concerns

Alford Town Council considers that National Grid has not made sufficient attempts to promote or publicise its community engagement events, resulting in low awareness and limited participation across the community. This is of particular concern given the scale of the project and the significance of its potential environmental, social, and economic impacts.
Failure to Notify Alford Town Council – ES Stakeholder Invitation

The Chief Executive Officer of Alford Town Council did not receive an invitation to the Environmental Statement (ES) stakeholder consultation event. This omission raises concerns about compliance with the statutory framework governing consultation on Nationally Significant Infrastructure Projects (NSIPs).
Legal framework and timeframes:

Planning Act 2008, Section 42 (Duty to consult): requires applicants to consult prescribed consultees, local authorities, and persons with an interest in the land before submitting an application. Alford Town Council, as the parish-level authority directly affected, is a statutory consultee under this section.
Planning Act 2008, Section 47 (Duty to consult local community): requires developers to prepare a Statement of Community Consultation (SoCC), setting out how they will consult local communities, and to carry out consultation in accordance with that statement. Parish and town councils are expected to be key conduits for community input.

Infrastructure Planning (EIA) Regulations 2017, Regulation 12(3): requires that consultation bodies and the public must be given “a period of not less than 30 days” in which to make representations on scoping or environmental information.

Planning Inspectorate Guidance (Advice Note 7: Environmental Impact Assessment, Screening and Scoping, 2020): confirms that statutory consultees must be notified at the outset of the scoping process and given adequate time (minimum 30 days) to respond.

Implications:

By failing to provide formal notification and invitation to Alford Town Council’s Chief Executive Officer, within the requested timeframe. National Grid may have breached its statutory duty under Sections 42 and 47 of the Planning Act 2008 and Regulation 12 of the EIA Regulations 2017, as well as failing to follow its own SoCC commitments.

This omission risks rendering the consultation procedurally defective, as the 30-day statutory consultation period cannot be considered valid if a relevant consultee was not properly notified.

Rural Community Engagement Concerns

Alford Town Council meets as a full council on a monthly basis and therefore has regular opportunities to consider and respond to consultations of this nature.

However, many of the smaller parish councils in the surrounding area — including Bilsby with Farlesthorpe, Aby and Swaby— do not employ a full-time Officer and do not hold monthly meetings. PINs also decided in 2004, with no prior notice, that Parish Meetings – such as Well, Hannah, and Rigsby with Ailby which exist to represent even smaller communities would no longer be eligible to submit their own representations – even though preferred project routes often, and quite deliberately, choose to avoid larger communities at the expense of the smallest ones.

As a result, these rural parishes have fewer administrative resources and longer decision-making cycles, meaning they require more proactive support and extended timeframes to effectively participate in statutory consultations.

National Grid has not sufficiently mitigated these challenges. The limited and inconsistently promoted consultation programme has failed to ensure that the voices of smaller rural communities are adequately captured. This creates a material risk that viewpoints from parishes most directly affected by construction traffic, overhead line routing, and substation siting are under-represented in the Environmental Statement.

In practice, rural residents are often finding out information second-hand, through snippets shared informally, rather than from clear and direct engagement by National Grid. This piecemeal communication has already contributed to heightened anxiety, uncertainty, and mental health pressures in the affected communities. The lack of reliable information risks fuelling misinformation, division, and a breakdown of trust between residents, local authorities, and National Grid.

Such shortcomings are inconsistent with:

Planning Act 2008, Section 47 (Duty to consult local community): which obliges developers to prepare and follow a robust Statement of Community Consultation (SoCC) that reaches all affected local communities, not only larger councils with greater resources.

Infrastructure Planning (EIA) Regulations 2017, Regulation 12(2)(c): which requires that the “public concerned” are given early and effective opportunities to participate in environmental decision-making. Equality Act 2010 and the Public Sector Equality Duty (PSED): requiring public engagement processes to avoid disadvantaging vulnerable groups, including those at risk of stress-related and mental health conditions.

Alford Town Council therefore requires that the engagement strategy is urgently revised to include:
Targeted outreach and dedicated briefings for small parish councils with limited capacity.
Extended consultation periods to align with less frequent parish meeting cycles.
Provision of materials in accessible formats (print, digital, audio) to ensure inclusivity.
A clear and consistent communications plan to provide reliable, timely, and accessible updates, thereby reducing anxiety and protecting the mental wellbeing of affected communities.

Action requested:

National Grid must immediately reissue the consultation invitation to Alford Town Council and provide a full 30-day period for response from the date of corrected notification.
The Examining Authority should be informed of this procedural flaw to ensure compliance before the application progresses to Examination.

In Alford Town Council’s view, National Grid’s failure to adequately promote engagement opportunities has meant that residents, businesses, and community organisations have not been given the fair, inclusive, and transparent opportunity to shape the project, as required by law and policy.

The information has not been produced in a full range of accessibility formats as has been requested by the Chief Executive Officer at the engagement events that she attended. This includes but is not limited to A0 size maps and audio files.

We therefore request that:

The Statement of Community Consultation is revisited, with an independent audit of whether it has been complied with.

A programme of revised, widely promoted engagement events is delivered, using multiple accessible channels (print, online, audio, easy-read).

National Grid provides evidence of how community feedback has been incorporated into design decisions, as required by EN-1 and the Planning Act 2008.

National Grid provides evidence to Alford Town Council's Chief Executive Officer demonstrating quantitative methods of how National Grid promoted the Community Engagement Events both on and off line. Address the inadequate publishing by National Grid of their files, data and reports on the internet when Central Government has identified the following information which has a direct correlation to poverty, owning computers and accessing the internet.

The Income Deprivation Affecting Older People Index (IDAOPI) shows that Alford's neighbourhoods fall in the 4th and 5th national deciles, meaning that 20–40% of LSOAs in England are more deprived, but 60–80% are less deprived. This confirms that a significant cohort of Alford's older residents live with income deprivation, heightening vulnerability to construction disruption, access issues, and pressure on health services.

Without owning computers or accessing the internet due to costs and the fact that many areas of Alford and the surrounding areas do not have Fibre Broadband to download large files and reports; Alford Town Council feel that National Grid is not sufficiently mitigating against this to engage with all cohorts of the community but especially those affected by poverty, age or disabilities.

Members of the public who have requested paper copies of long and complex documents and maps have often found their requests have been denied or they have asked for very large payments to cover the cost of printing and postage. When documents have been sent that has been done using a next day courier service, including on Saturdays and Sundays – amongst the most expensive and usually unnecessarily fast of the services available. These high charges, which many cannot or choose not to afford, could immediately be reduced. This would improve access to this format of the consultation documents.

Alford LSOAs – IDAOPI (Income Deprivation Affecting Older People Index, 2019)

LSOA name	ONS code	IDAOPI Rank (1=most deprived of 32,844)	National Decile	Notes
East Lindsey 008A	E01026042	11201	4	Moderately deprived
East Lindsey 008B	E01026043	13792	5	Mid-range deprivation
East Lindsey 008C	E01026044	12466	4	Moderately deprived
East Lindsey 008D	E01026113	15023	5	Mid-range deprivation
East Lindsey 008E	E01026117	14655	5	Mid-range deprivation

(Source: DLUHC, English Indices of Deprivation 2019 – File 7: IDAOPI.)

Rationale by the Chief Executive Officer to Alford Town Council:

Given Alford's location at the foot of the Lincolnshire Wolds AONB, its nationally significant heritage assets, and its visitor economy, LVIA must be robust, policy- compliant, and capable of scrutiny under the Planning Act 2008 framework. Failure to adhere to GLVIA3, EN-1, and EN-5 would render the assessment inadequate and open to legal challenge.

Scoping request 5.1 – Viewpoint list:

Alford Windmill, Alford Manor House, Tothby Manor, East Street, Alford Market Place, AONB gateways, PRoWs between Alford–Bilsby–Woodthorpe. See Map File1

Scoping request 5.2 – Night-time effects:

Assess construction/operational lighting with dark-sky mitigation

Scoping request 5.3 – Lighting, Dark-Sky Mitigation and HGV Movements

Alford Town Council request that the ES must assess construction and operational lighting impacts, with reference to GLVIA3, ILP GN01/21 – Guidance Note for the Reduction of Obtrusive Light, BS 5489-1, and CIE 150.

Alford Town Council request that National grid use the following assessment:

Use National Grid’s own HGV forecasts (daily quotas and timing data from the draft CTMP) to define realistic lighting demand profiles for compounds, substations, lay-down areas, and delivery routes near Alford, Bilsby, Rigsby, and Woodthorpe during each quarter of the year, to clearly demonstrate the season impacts.

National Grid to model worst-case peak HGV days, typical, and low-activity scenarios, including spatial spill, glare, and skyglow.

Prepare reports results against ILP environmental zone thresholds (E2–E3), including vertical illuminance, Upward Light Ratio (ULR), and glare metrics.

Incorporate mitigation, including:

Warm-white LED ($\leq 3000\text{K}$).

0% ULR luminaires with baffles/hoods.

PIR/photocell controls and curfew dimming (22:00–06:00).

Minimise mast heights and avoid above-horizontal aiming.

Provide night-time photomontages, ZTVs, and isoline maps showing predicted effects at heritage receptors (e.g. Alford Five-Sailed Windmill, Alford Manor House, Tothby Manor) and AONB settings.

Deliver a Lighting Strategy & Management Plan tied to the CTMP, setting out delivery windows, dimming/switching protocols, emergency exceptions, and curfew arrangements.

Include a post-installation verification regime (lux monitoring, calibrated photos) and a clear complaints/rectification protocol with thresholds to trigger remedial action.

This requirement is essential given the rural character of Alford, the dark-sky sensitivity of the Lincolnshire Wolds AONB, and the reliance of local tourism and heritage assets on preserving a low-light environment. The above mentioned reports should be produced in paper copies, online and in complete audio files to ensure compliance with the access requirements of Alford Town Council and an aged population.

6.) Historic environment

Scoping request 6.1 – Significance & setting:

Assess the Grade I Windmill, Alford Manor House and listed structures, considering pylons, DC to AC converter stations, and cumulative change

Scoping request 6.2 – Heritage at Risk:

Assess impacts on mills, listed buildings, land of interest and heritage at risk across Lincolnshire.

Scoping request 6.3 – Alford Manor House, Tothby Manor, Medieval Land, and Ancient Woodlands: Assess Manor House (Grade II*), medieval ridge-and-furrow land, deserted medieval villages (DMVs), and ancient woodlands as part of Alford's cultural identity and landscape character.

Scoping request 6.4 – Land Vibrational Impact on Heritage Assets

The ES should include a dedicated assessment of ground-borne vibration arising both from construction activities (e.g., piling, heavy plant, cable trenching, converter station platform works) and from the intensified movement of HGVs and abnormal loads during project delivery.

This assessment must:

Establish baseline vibration levels at sensitive receptors, particularly listed buildings such as Alford Five-Sailed Windmill (Grade I), Alford Manor House (Grade II*), and nearby scheduled/heritage assets.

Apply recognised standards, including BS 7385-2:1993 (Evaluation and measurement for vibration in buildings – Guide to damage levels from groundborne vibration) and BS 6472-1:2008 (Guide to evaluation of human exposure to vibration in buildings), to evaluate potential structural damage and occupant disturbance thresholds.

Model vibration propagation through local geology and soils (noting Alford's chalk and clay subsoils), as these influence attenuation and resonance effects.

Assess potential impacts from long-duration construction traffic along rural roads not designed for HGV intensity, with cumulative consideration of vibration fatigue on historic fabric.

Provide a mitigation strategy to Alford Town Council in all formats including audio as previously mentioned throughout this report, which should include:

Pre-construction structural surveys of listed buildings to record condition. Traffic management plans to minimise HGV vibration near sensitive receptors. Use of low-vibration construction techniques where practicable.

The ES should include a dedicated assessment of ground-borne vibration arising from both: Construction activities (e.g., piling, heavy plant, cable trenching, and substation platform works); and Increased HGV and abnormal load traffic associated with the project. Alford Town Council request that National Grid's assessment must:

Establish baseline vibration levels at sensitive receptors, including the Grade I Five-Sailed Windmill, Alford Manor House (Grade II*), Tothby Manor, and other listed/heritage buildings.

Apply recognised standards, such as BS 7385-2:1993 (Evaluation and measurement for vibration in buildings – Guide to damage levels) and BS 6472-1:2008 (Evaluation of human exposure to vibration in buildings).

Model vibration transmission through local geology and soils (chalk, clay, and drift deposits), which influence resonance and attenuation.

Include a Construction Vibration Management Plan (CVMP) with continuous or periodic monitoring at agreed receptors. This must specify action thresholds (in mm/s Peak Particle Velocity) beyond which works are halted or modified until remedial measures are in place.

Require clear written documentation of how monitoring will be conducted, recorded, reported, and enforced, both during construction and into the operational phase.

Mitigation and Compensation:

Alford Town Council request a precautionary survey of vulnerable heritage structures and land should be undertaken before construction to establish baseline condition.

Mitigation measures (traffic routing, low-vibration plant, vibration dampening techniques) should be implemented wherever thresholds may be exceeded. Alford Town Council request that a full paper trail and systems audit be published, and produced in several accessible formats so that the Council as a major Stakeholder can scrutinise accordingly.

The ES should set out a financial compensation framework, ensuring that if damage to buildings or land is demonstrably caused by construction or operational vibrations from the project, affected property owners will receive fair and timely compensation. This is in line with the Land Compensation Act 1973 and principles of environmental justice.

Given the fragility of historic structures and soils in the Alford area, a precautionary approach is required to, ensuring that heritage and community assets are not irreversibly harmed by vibrational impacts. Given the fragility of heritage assets such as windmills and thatched structures in Alford. Alford Town Council request that a precautionary approach should be adopted, ensuring no permanent structural harm or accelerated deterioration results from vibrational impacts.

Socio-economics & health

Scoping request 7.1 – Tourism & Businesses

Alford Town Council request that the ES must include a robust assessment of potential impacts on tourism, events, and small businesses and agriculture in Alford and the surrounding parishes, recognising that the local economy is highly dependent on heritage-led tourism, cultural events, and small independent enterprises.

The assessment should include:

Visitor flows & tourism economy:

Model potential reductions in visitor numbers to Alford's heritage attractions (e.g. Alford Five-Sailed Windmill, Alford Manor House, Alford Craft Market, Burgh le Marsh Windmill) due to construction disruption, traffic congestion, noise, dust, and visual intrusion.

Quantify potential lost visitor spend and related employment, using local tourism value data from Visit Lincolnshire and Greater Lincolnshire LEP visitor economy reports.

Cultural & community events:

Assess the risk of disruption to seasonal and community events central to the town's economy and consider reduced accessibility, parking pressure, and visitor confidence, with impacts measured against event attendance baselines.

Small business and retail impacts:

Evaluate effects on high-street retail, hospitality, and food services reliant on visitor trade.

Consider supply-chain impacts on rural microbusinesses during road closures, HGV movements, and severance.

Cumulative impact with wider regeneration programmes:

Recognise that Alford Manor House and Spilsby Sessions House have received Government Levelling Up Fund (LUF) investment, requiring them to meet specific visitor and income quotas. Disruption risks non-delivery of these public-funded

outcomes, contradicting national levelling-up objectives and wasting public investment.
Health and wellbeing impacts on workforce and residents:

Consider the psychological and financial stress on small business owners, volunteers, and employees arising from uncertainty and reduced trade during extended construction periods.

The ES should present a clear, quantitative socio-economic baseline, assess potential negative impacts, and set out mitigation measures (e.g. traffic management, targeted signage to support local businesses, community benefit schemes, and promotional partnerships with local tourism bodies to offset visitor loss).

Scoping request 7.2 – Temporary Traffic Bypass & Traffic Management for Alford

The ES must explicitly state whether National Grid intends to construct or use any temporary bypass routes around Alford (for HGVs, abnormal loads, or general traffic) during construction. If such bypasses are not proposed, the ES shall:

Provide rational basis for excluding a bypass, including engineering, cost, environmental, and traffic-modelling data.

Model traffic flows through Alford under worst-case scenarios (without bypass) analysing impacts on congestion, emissions, noise, safety, and community severance.

Include mitigation options such as controlled delivery timing, alternative routes, signage, local access protection, and where necessary temporary traffic bypasses.

Provide drawings/maps showing any proposed bypass routes or traffic diversions, with expected usage, duration, and HGV quotas.

If a bypass route or traffic diversions are to take place, how is National Grid going to mitigate against the following:

Loss of business and employment. Economic growth of Alford.

Scoping request 7.3 – EMF and public concern:

Include a clear EMF chapter with community-facing summary.

Scoping request 7.4 – Local businesses and employment:

Assess disruption and opportunities for jobs, apprenticeships, and procurement.

Scoping request 7.5 – Pollution impacts on health & medical provision:

Assess air, noise, and light pollution impacts on public health (including asthma, COPD, cardiovascular and mental health). Use Government/NHS data (e.g. 6.5% asthma prevalence in England, Lincolnshire's higher COPD rates). Assess adequacy of medical infrastructure (GP, hospital) to accommodate demand, and propose mitigation.

Traffic, access & construction management

Scoping request 8.1 – CTMP:

Provide Construction Traffic Management Plan to avoid Alford town centre, school peaks, and protect NMUs.

Noise, vibration & air quality

Scoping request 9.1 – Baseline & receptors:

Identify sensitive receptors and commit to low-noise design.

Scoping request 9.2 – Noise, light, and air pollution:

Quantify baseline and predicted changes, using UKHSA/WHO guidance. Assess PM2.5 and NOx; include light pollution impacts on health, biodiversity, and dark skies.

Biodiversity, soils & water environment

Scoping request 10.1 – AONB habitats and farmland:

Assess impacts on hedgerows, habitats, springs, chalk streams, bore hole water supplies and soils.

Scoping request 10.2 – Flood risk & drainage:

Provide site-specific FRA and surface-water design.

Scoping request 10.3 – Sea level rise and flood resilience:

Assess climate change and sea level rise impacts, ensuring infrastructure resilience to 2050+.

Scoping request 10.4 – Groundwater, Topography and Construction Feasibility (Alford and surrounding areas, especially Alford Road).

Rationale:

When residential development was constructed on Alford Road, Bilsby, there were well-documented issues relating to topography and the water table, which complicated construction and required additional mitigation. This demonstrates the sensitivity of local ground conditions and the potential for adverse impacts if major infrastructure is introduced without adequate investigation.

The ES must therefore:

Undertake a site-specific hydrogeological assessment of the Bilsby/Alford area, including water table depth, seasonal variability, and interaction with surface drainage systems.

Consider historic construction issues in the area as case evidence of ground instability or flood risk. Assess how heavy civil engineering works (pylon bases, trenching, substations, sealing end compounds) could interact with shallow groundwater, causing localised flooding, subsidence, or contamination. Model potential cumulative effects of climate change and sea-level rise on already high water tables in the Alford–Bilsby corridor.

Identify mitigation (e.g. raised foundations, sealed cable ducts, dewatering controls, and robust Sustainable Drainage Systems in the Urban areas.

Demonstrate how lessons learned from past construction challenges (such as the Bilsby Road housing development) have been factored into the engineering and environmental design of the project.

Rationale: Without a clear groundwater and topography risk assessment, there is a high likelihood that the project could replicate or worsen historic construction problems in Alford, leading to flooding, structural instability, or environmental damage.

Biodiversity, Soils & Water Environment

Additional Scoping Requirements – Conservation Woodland & Orchard (Fields 8684, 8474, 0081) See **Figure 2**

Scoping request 10.5 – Biodiversity Baseline & Protected Species

The ES must include detailed ecological surveys of the 2.125 acre broad-leaf woodland and 8.5 acres of conservation grassland, with attention to:

Protected species present (bats, badgers, grass snakes, newts, nesting raptors).

Seasonal surveys for amphibians, reptiles, and breeding birds.

Orchid species and other indicator hay-meadow flora.

Use of the site by small mammals and pollinators.

Mitigation should be proposed to avoid habitat loss, severance, or disturbance.

Scoping request 10.6 – Ancient & Veteran Trees

Assess potential direct/indirect impacts on ancient/veteran oaks (150+ years old) and WI Millennium oaks.

Apply BS 5837:2012 (Trees in relation to design, demolition and construction).
Provide Root Protection Area mapping.
Consider vibration and hydrological effects from construction/HGV movements.

Scoping request 10.7 – Hedgerows & Historic Landscape Features

The ES must assess impacts on:

Traditional hedgerows planted along early 20th century field edges.

The parish boundary between Alford and Bilsby.

Ridge-and-furrow remains still visible in the woodland.

These are historic landscape features and should be evaluated under the Hedgerow Regulations 1997, Historic England guidance, and NPPF heritage policy.

Scoping request 10.8 – Orchard of Rare Lincolnshire Varieties

The ES must specifically recognise and assess the orchard containing:

All known Lincolnshire apple cultivars.

Two Lincolnshire plum varieties.

This constitutes a genetically and culturally significant collection. NG must assess risks of loss, damage, or biosecurity compromise, and propose mitigation (e.g., protective fencing, avoidance of dust/pollution drift, provision for replacement planting if impacted).

Scoping request 10.9 – Cumulative Effects on Habitat Connectivity Assess how the proposed scheme might fragment habitats and sever wildlife corridors connecting this site to surrounding farmland, the AONB, and river corridors.

Include modelling of light, noise, and air pollution on nocturnal species (bats, owls, amphibians).

Consider cumulative effects with other NG projects nearby.

Scoping request 10.10 – Community & Cultural Value

Given the memorial trees, WI Millennium oaks, and local orchard collection, the ES must assess impacts on community identity, cultural heritage, and sense of place, in line with EN-1 (NPS) duty to consider wellbeing and cultural assets.

Cumulative and in-combination effects

Assess combined effects with other National Grid/EGL projects across landscape, traffic, socio-economics, and health.

Scoping request 11.1 – Programme-level cumulative effects

The Environmental Statement (ES) must provide a transparent, programme-level Cumulative Effects Assessment (CEA) in line with the Infrastructure Planning (EIA) Regulations 2017 and relevant National Policy Statements. The assessment must cover combined and sequential effects from this project alongside other consented, proposed, or reasonably foreseeable schemes affecting Lincolnshire (e.g., other Great Grid Upgrade elements, Eastern Green Link works, substations, sealing-end compounds), across landscape/visual, heritage, ecology, water, traffic/transport, noise, air quality, lighting, socio-economics and human health. [Legislation.gov.uk](https://legislation.gov.uk)

Alford Town Council request that all legal and policy basis must be evidenced in the ES:

EIA Regs 2017 (Reg. 14 and Schedule 4) require a description of likely significant effects including cumulative effects with other existing and/or approved projects, and measures to avoid, prevent, reduce or offset such effects.

NPS EN-1 (Overarching) requires identification and mitigation of significant environmental effects, including cumulative effects, and demonstration of “good design” in sensitive locations.

NPS EN-5 (Electricity Networks) applies EN-1 principles to overhead and substation infrastructure; applicants must evidence routeing/design choices in landscapes where cumulative change is a risk.

Planning Inspectorate Advice Note on CEA (2024/2025): requires a proportionate, auditable CEA method (tiered long-list/short-list; temporal/spatial scope; inter-project and intra-project pathways) suitable for NSIPs.

Alford Town Council request that National Grid provide the Method requirements listed below in all formats including audio as previously mentioned:

Tiered project schedule: long-list all relevant plans/projects; refine to a short-list using agreed spatial and temporal criteria; present in a matrix with status (built/operational/consented/under consideration) and construction/operation overlap windows.

Common temporal baseline: align construction programmes and outages to analyse peak overlap (e.g., highest HGV days, major lifts, commissioning).

Common spatial baseline: map Zones of Influence per topic (e.g., ZTV for LVIA/lighting; noise isopleths; AQ dispersion; traffic assignment), then overlay to derive receptor-based cumulative impacts (communities, PRoWs, AONB gateways, Windmill/Manor House/Tothby Manor).

Inter-topic linkages: assess secondary/combined effects (e.g., traffic → noise/air/health; lighting → LVIA/ecology/health), consistent with Schedule 4.

Mitigation hierarchy at programme level: demonstrate how design coordination and phasing reduce cumulative harm (e.g., avoiding simultaneous peak works near Alford; synchronised traffic curfews; shared compounds; undergrounding through the most sensitive view corridors per EN-5).

Reasonable worst-case parameters: where the Rochdale Envelope is used, define bounding values (HGV quotas/timings, crane heights, lighting curfews, outage durations) so cumulative modelling is auditable. (Cross- refer PINS Advice Notes 7 & 9).

Reporting: provide a programme-level residual effects register and commitments tracker showing how cumulative impacts are avoided/reduced/offset; include a Community Benefits/Legacy proposal targeted at receptors bearing residual cumulative effects.

Rationale: Lincolnshire faces simultaneous grid upgrades; without a rigorous, policy-compliant CEA, significant combined/sequential impacts on the Lincolnshire

Wolds AONB, heritage settings and local communities could be underestimated, contrary to the EIA Regulations and EN-1/EN-5.

Scoping request 12.1 – Design Review, Feedback Loops, and Accessible Consultation

The ES must demonstrate not only how design has evolved iteratively in response to feedback from Alford Town Council, statutory consultees, and the wider community, but also how consultation has been accessible to all community members, in compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED).

Specifically, the consultation process should:

Provide project information and technical documents in a range of accessible formats, including large print, easy-read summaries, audio recordings, and screen-reader compatible digital versions, to ensure inclusion of councillors and community members with visual impairments.

Ensure that blind or partially sighted members of Alford Town Council and the public are not disadvantaged in engaging with National Grid's consultation process, in line with duties under the Equality Act and the Accessible Information Standard (NHS England, 2016).

Document the mechanisms by which feedback from under-represented and disabled groups is captured, considered, and translated into specific design changes (e.g., route adjustments, compound siting, mitigation design).

National Grid must include a clear audit trail within the ES showing which design changes resulted directly from accessible consultation processes, thereby evidencing compliance with equalities and accessibility obligations.

This approach is essential so that Alford Town Council can be satisfied that consultation is fair, inclusive, and legally compliant, and that the resulting scheme design demonstrably reflects the needs of all sectors of the community, including those with disabilities.

Scoping Request 13.0 - Deliverables Alford Town Council request at PEI/ES stage that National Grid supply in all accessible formats as previously mentioned the following:

Routeing/options report with undergrounding tests.

LVIA with agreed photomontages.

Heritage setting assessment (Windmill, Manor House, medieval land, woodlands).

Socio-economic and health assessment with Community Benefits/Legacy Plan.

Draft CTMP and Outline CEMP.

Cumulative effects chapter across all Lincolnshire projects.

Scoping Request 14 – Source to Tap Investigation and Report concerning the Public Water Supply & Groundwater Protection (Rigsby ↔ Miles Cross Hill, Alford)

Local knowledge indicates that Rigsby village is supplied from the vicinity of Miles Cross Hill, Alford (local high-ground at the Wolds escarpment). Given the sensitivity of potable supply assets and the area's high groundwater, the ES must include a source-to-tap risk assessment covering construction and operation. What the ES must do Confirm and map the supply. Liaise with the statutory undertaker (Anglian Water) and Rigsby Farm Ltd to confirm the exact source, mains routes, service reservoirs, booster stations, and any boreholes/wells serving Rigsby.

Map Environment Agency Source Protection Zones (SPZ1/2/3), groundwater vulnerability, springs and soakaways across Miles Cross Hill → Rigsby.

Legislative & policy compliance

Assess effects under the Infrastructure Planning (EIA) Regulations 2017

(Schedule 4: likely significant effects incl. water), the Water Industry Act 1991, the

Water Framework Directive obligations as retained in UK law, and the Environmental Permitting (England & Wales) Regulations 2016 (discharges to ground/controlled waters).

Follow EA Groundwater Protection position statements and Guidance for Pollution Prevention (GPP 5: works in and near water); reference CIRIA C741 (Environmental Good Practice on Site) and C532 (Control of water pollution from construction sites).

Hydrogeology & construction feasibility

Provide a site-specific hydrogeological model (water-table depth/seasonality; permeability; preferential pathways) for the Miles Cross Hill–Rigsby corridor.

Assess interactions of pylon foundations, trenching, hauled routes, compounds, and any substation/sealing-end platforms with shallow groundwater (dewatering need, settlement, uplift, turbidity plumes).

Risk pathways & receptors

Identify contamination pathways (fuel storage, concrete washout, bentonite/slurry, fine sediments, oils) to SPZs and potable assets; include worst-case rainfall and HGV incident scenarios.

Consider historic difficulties with high water-table/topography locally (e.g., around Bilsby Road) as case evidence of ground sensitivity.

Mitigation & controls (secured in the CEMP/CWMP)

Stand-off distances and no-dig zones around SPZ1 assets and mains; protect/encase crossings; prefer trenchless (HDD/micro-tunnel) where feasible.

110% bunded fuel/chemical storage; designated refuelling pads; spill-kit provision; permit-to-pour for concrete near drains/karst features.

Dewatering design with settlement tanks/lamella units; controlled discharge under permit; silt fences and track-out control.

HGV routing/timing to avoid SPZ1 where practicable; emergency access maintained to all water utility sites.

Monitoring, triggers & emergency response

Baseline and during-works monitoring (turbidity, hydrocarbons, pH, EC) at agreed boreholes/springs; action thresholds that pause works and trigger remediation.

A Utility Asset Protection Plan and Potable Water Emergency Response Plan co- signed by Anglian Water, with 24/7 contacts and tanker/temporary supply contingencies.

Water resource use & licensing report covering the following

Quantify construction water demand, identify sources, and secure any EA abstraction/discharge permits; demonstrate no deterioration of WFD status.

Rationale: Protecting the public drinking water supply for Rigsby and safeguarding groundwater at Miles Cross Hill are critical. Given the area's high water-table and permeable drift over chalk, even short-term construction activities could pose disproportionate risks without robust design, method controls, and monitoring.

Scoping Request 14.1

Scoping Request 14.01 Local Electricity Supply Infrastructure Rigsby & surrounding villages

The primary electricity supply for residents and businesses in the parishes of Rigsby) is routed via Miles Cross Hill, Alford.

We request that National Grid:

Confirm the exact routing of existing supply infrastructure serving these communities.

Model potential risks to continuity of supply during both construction and operational phases of the proposed project.

Assess resilience and mitigation measures, including provision of temporary or alternative routing should the Miles Cross Hill supply be impacted.

Engage directly with affected businesses including Rigsby (RFC Ltd) & Haugh (Marriages) and residents to provide clarity and reassurance about service continuity, given their economic and social reliance on secure electricity supplies.

Legislative Context

Under the Electricity Act 1989, Section 9, electricity licence holders have a statutory duty to “develop and maintain an efficient, co-ordinated and economical system of electricity distribution” and to ensure supply continuity.

The Planning Act 2008, Sections 42–47, requires that Nationally Significant Infrastructure Projects (NSIPs) undertake proper consultation with prescribed consultees, affected parties, and local communities. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require that likely significant effects on essential utilities and infrastructure are identified at the scoping stage. Given the reliance of rural communities and agri-businesses on stable electricity supply, this issue must be explicitly scoped and mitigation measures set out to avoid disproportionate socio-economic impacts.

Conclusion

Alford Town Council is committed to constructive engagement to enable nationally important energy upgrades while safeguarding the heritage, landscape, economy and wellbeing of our community.

The scoping points above are essential to a sound ES and to achieving good design with least-harm solutions in and around Alford and the smaller parishes who will be impacted by the proposed infrastructure.

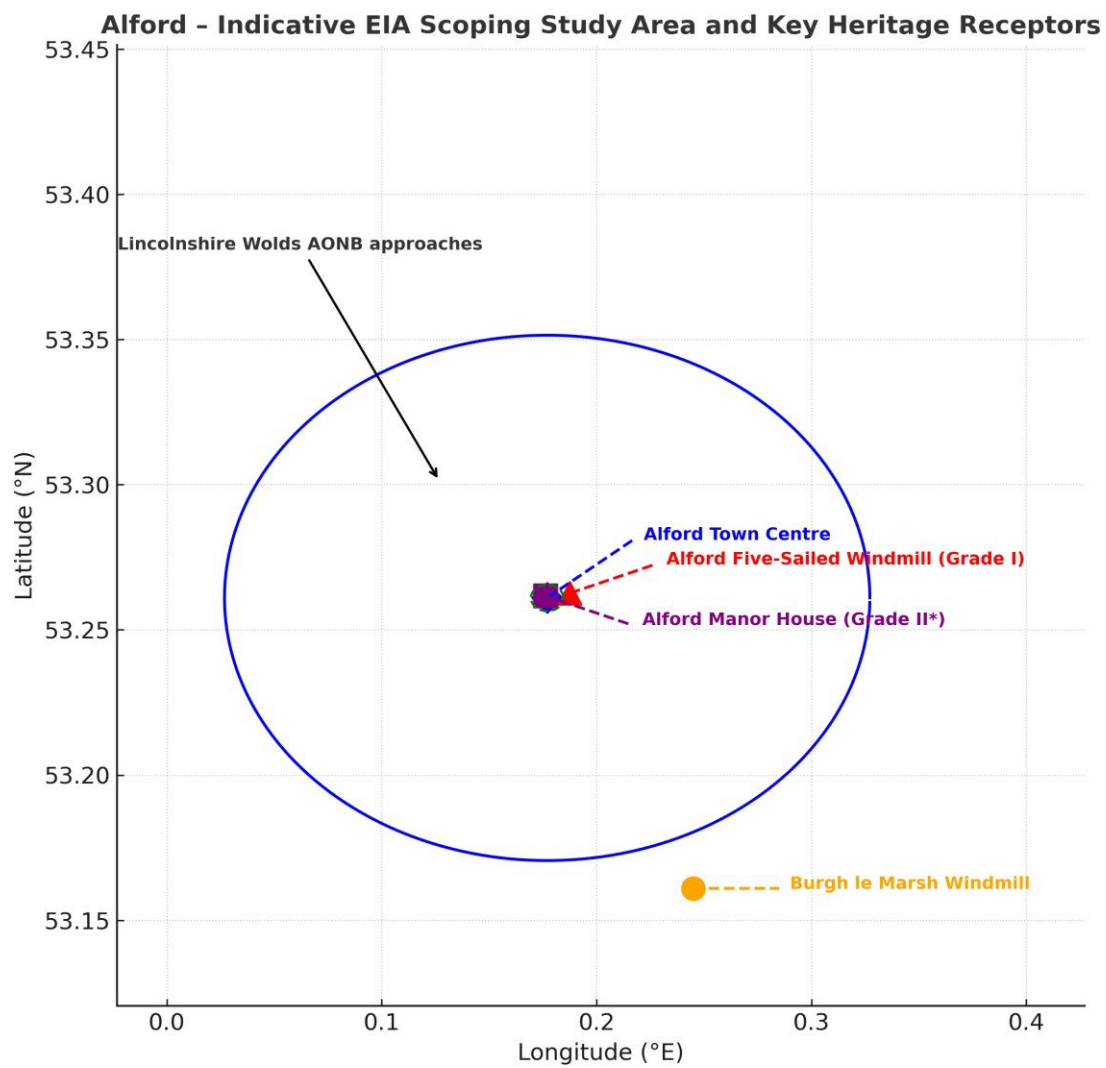
Please engage with the Chief Executive Officer and Members of Alford Town Council to agree LVIA viewpoints and baseline survey logistics at the earliest opportunity.

Contact:

[Redacted]

Email: [Redacted] [@alfordtowncouncil.gov.uk](mailto:[Redacted]@alfordtowncouncil.gov.uk)

Figure 1 – Indicative Scoping Study Area and Key Heritage Receptors



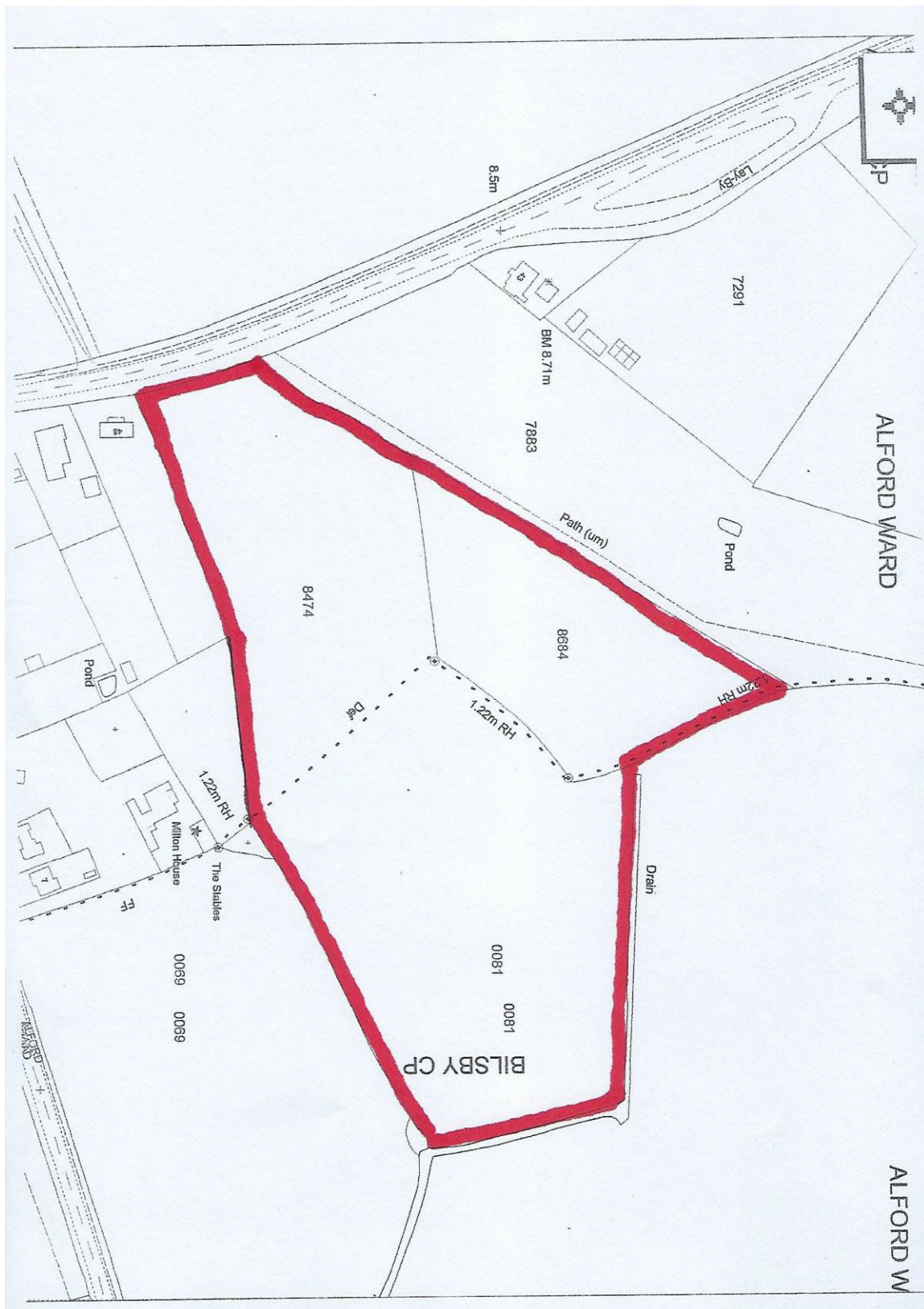


Figure 2

██████████
Senior Environmental Advisor
The Planning Inspectorate

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

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

By email: EasternGreenLink5@planninginspectorate.gov.uk

Our ref: EGL5/ Scoping/CM

30th September 2025

Dear ██████████

EASTERN GREEN LINK 5 - EIA SCOPING NOTIFICATION AND CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for requesting Anglian Water's comments on the scoping report for the above project, which is located within the local planning authority areas of East Lindsey District Council and Lincolnshire County Council. Anglian Water is the statutory water and sewerage undertaker within the onshore proposals of the project area.

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

Anglian Water supports the UK's Great Grid Upgrade in principle, recognising the imperative to swiftly increase transmission capacity to enable the decarbonisation of the grid in the move to a more sustainable future and to address climate change. The upgrade of the network through the Anglian Water region will support our delivery of net zero by 2030 through our renewable energy projects. Improved capacity across the region will also provide additional resilience for energy supply including to Anglian Water sites in the face of more extreme weather events.

Anglian Water 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 2024) and 2024 IAQM guidance¹⁵, Anglian Water requests that the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will be supplied with water and its wastewater managed; how water recycling and supply assets serving residents and business 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).

The Scheme – Anglian Water Infrastructure

We would expect the next stages of the project (including the Preliminary Environmental Impact Report – PEIR) to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure.

There are existing Anglian Water assets both above and below ground, which serve the surrounding businesses and community, for example, at Alford, Anderby Creek, Bilsby, Huttoft, Saleby and Thurlby. These include water recycling centres, water treatment works and sewer pumping stations. There are several water mains and sewers within the project area within the highway or its verges which link to these various settlements.

Referring to the Scoping Document, this is relevant to all the elements of the onshore proposals:

- Anderby Creek landfall – pipes.
- Converter stations (east and west).
- Underground cables emerging preferred corridors: from landfall to converter station siting zones to LCS-B substation.

There are water abstraction locations and source protection zones (1 and 2) within the project area with reference made to these in Chapter 10 ‘Geology and Hydrogeology’. We would therefore have concerns on any construction works or operation of the scheme that would adversely impact on these zones and water quality and would welcome further discussion on these matters.

Overall, we would want to ensure the location and nature of our assets serving local communities are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations could enable the applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

As a starting point, a desk top study of utilities searches should, therefore, be undertaken 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

Initially, we recommend that the EGL5 team identify the location of our assets from a desktop study of <http://www.digdat.co.uk/>

For land investigation questionnaires relating to Anglian Water’s above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com to undertake the necessary land interest questionnaires.

The applicant should consider the site access locations and localised potential construction stage impacts on Anglian Water assets. We would advise the access locations (construction and operation) either seek to avoid the interface or undertakes necessary construction measures to protect our asset and these mitigation measures are set out in the outline Construction Environment Management Plan (oCEMP) and Construction Traffic Management Plan (oCTMP) supporting the Environmental Statement (ES).

Anglian Water would welcome specific reference on how the interfaces with utility assets such as for sewers and water supply within the Order Limits will be managed through the construction of haul roads, bellmouths. 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 these 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.

Anglian Water would seek to ensure that 24 hours /7-day access to our assets is not compromised and, therefore, would welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents.

Anglian Water's template Protective Provisions set out the standard minimum stand-off distances that construction should be from a range of sizes of Anglian Water's underground assets. The full Protective Provisions can be provided to the applicant.

In addition, we also strongly recommend that an asset clash detection and assessment be undertaken by Anglian Water to confirm of assets within the project area as early as possible and before the design fix. Our National Infrastructure team is responsible for identifying Anglian Water assets in relation to the Development Consent Order (DCO) process.

Early engagement is critical to ensure accurate asset data is captured and to avoid potential delays later in the project lifecycle. Sharing data at an early stage enables timely clash detection and coordination. Given the large number of NSIPs and other Anglian Water projects being delivered in this Asset Management Period 8 (AMP8 - 2025-2030), there is a strong advantage to having upfront discussions with Anglian Water in relation to our asset interfaces with the project.

This engagement typically includes:

- 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.

To support efficient assessment and integration into our systems, it would be helpful if the boundary/mapping is provided in Shapefile format so that we are able to update our records.

You will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with Anglian Water around project scope, timescales, and other key details will help 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 Anglian Water assets or projects, and will be dependent on project size, complexity and requirement from the project. Typically, this includes input from both Anglian Water Services and our delivery teams. This process will also help to inform mitigation measures, for example in the CEMP and CTMP.

Anglian Water would ask that the following stand-off distances are applied (as indicated in our template Protective Provisions) for working each side of the medial line of pipes where construction works are undertaken - including where cabling is undergrounded, CSE compounds, and where

pylons are constructed. Please note: These distances are a starting point for design, assessment, diversion or mitigation measures including crossing provisions.

- (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 subparagraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

Appendix 29.A 'Major Accidents and Disasters Scoped In or Out of Further Assessment' refers to the potential for utilities failures of water supply and the sewerage system but this is only in respect of these utilities being used by the project during construction and operation and has been scoped out.

We consider that until the clash assessment has been undertaken by Anglian Water then likelihood and magnitude impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

In Chapter 28 'Greenhouse Gases', Anglian Water notes that all phases of the development have been scoped into the EIA in relation to GHG assessment. The carbon emissions regarding any required diversions of utilities or the provision of connections should be factored into the operational and capital carbon elements of the proposed development.

Anglian Water has a considerable programme of investments in AMP8 (2025-2030) and will be managing the interfaces with our assets and diversions for a significant number of NSIPs within our region during the same period. Where interfaces/diversions cannot be avoided, we would recommend that NSIP Promoters that have a large number of Anglian Water assets (or assets of a strategic nature) interfacing with the project, engage with us on the specific detail of these interfaces at an early stage, as this will help inform the extent of the order limits, should any diversions be required, and help to reduce delays later in the process when the project reaches delivery stage.

Anglian Water's own programme of projects for AMP8 (2025-30) should be included with the projects long list of cumulative projects to be assessed in the EIA (Section 8.7.28 – 8.7.29).

For example, Anglian Water is proposing to develop a new reservoir in Lincolnshire, recognising the need to plan long term for our region's future in line with our adopted Water Resources Management Plan 2024 (WRMP24) Water resources management plan. Anglian Water has been developing this proposal since 2022, and the reservoir site and potential sources are identified in our WRMP24. The project is being progressed through the Development Consent Order application process as a NSIP. The reservoir itself would be located to the south-east of Sleaford, to the southwest of Heckington between Swaton, Screddington and Helpringham.

Scheme assessment, design, mitigation and connections

Anglian Water seeks clarification on the following matters:

- If water recycling/ sewerage services are required from Anglian Water for the Project (all stages).
- If a water supply is required for the project (all stages).

- The management of surface water drainage.

Anglian Water requests that these points are assessed early in the EIA. Further advice is provided below.

Water recycling/ sewerage services

As part of the overall drainage strategy for the project, details of how wastewater is intended to be disposed of and how this will be managed, such as a connection to an available public sewer will need to be confirmed. The situation should be confirmed for all stages (construction, operation and de-commissioning) within the EIA.

Water Resources and Water Supply

Anglian Water notes that the impact of water resources is proposed to be scoped in the ES (Table 9-6 of the Scoping Report). It is also noted that Section 9.7.5 of Chapter 9 'Water Environment' states a Water Resources Assessment (WRA) will be prepared to support the DCO application. Anglian Water recommends that the WRA is an integral part of this chapter of the ES. Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

The EGL5 project is located within the Water Resource Zones (WRZ) of Lincolnshire East designated as being within a 'seriously water stressed' region. In view of the potential impacts on water resources, the applicant is advised to consider the published Water Resources East [Regional Plan](#) which sets out the collective water companies position. It is welcomed that Anglian Water's WRMP [Water resources management plan \(anglianwater.co.uk\)](#) is listed as a data source in the Bibliography (under Section 9.9).

There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water. The project's EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA).

For applications under the 2008 Act, the WRA (or its summary) 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. Anglian Water recommends that the WRA is an integral part of the EIA.

The project should not assume that water will be available for construction and operation. If that water supply is not available from Anglian Water, then alternative supplies through local abstraction may cause environmental harm and so not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate Green House Gases (GHG).

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

Although Anglian Water does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

Anglian Water has adopted a '[Non-Domestic Water Requests Policy](#) - December 2024' (copy attached) which states that requests over 20m³/day will be declined. However, for NSIPs that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a WRA form must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. Anglian Water now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.

The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

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

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and 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 project's EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached with this letter.

Flood Risk, Drainage and Surface Drainage

Section 9.5.6 (Operational Phase) of Chapter 9 'Water Environment' confirms the strategy for managing surface water drainage would be included in the FRA to support the ES. This is welcomed by Anglian Water.

The Flood Risk Assessment (FRA) as part of the EIA for the project will need to assess all applicable sources of flooding to and identify any mitigation measures required to ensure flood resilience, taking climate change into account, and to prevent any off-site impacts.

Anglian Water is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems. Our 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.

Anglian Water will not accommodate any surface water run-off into a foul sewer or our combined sewer. This includes the construction stage of the development and as such Anglian Water will oppose any general provisions in the order which seek to connect to the public sewer network. Surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

The 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 Anglian Water 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 Anglian Water 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 Sustainable Drainage Systems (SuDS), Anglian Water would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.

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

Engagement and Next Steps

Anglian would welcome discussions with the EGL5 project team (section 9.3 of Chapter 9 refers), in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination and to avoid delays to construction timetables and delivery of the project.

Anglian Water will seek to engage further with the applicant through the pre-application phase to discuss, amongst other matters:

- The impact of construction/ operation of the project on Anglian Water's water and water recycling assets and sites.

- The design of the project to minimise interfaces with Anglian Water's existing/ proposed assets and specifically to avoid the need for diversions which have carbon costs.
- Confirmation of the project's cumulative impacts with Anglian Water's own infrastructure project which are being progressed in the short and long term.
- The requirement for potable and raw water supply connections (and regarding tankering requirements).
- Requirement for water recycling (surface water/ foul drainage) connections (if any).
- The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.
- The preparation of a draft Statement of Common Ground prior to submission.

Please do not hesitate to contact myself via strategicgrowth@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Chartered Town Planner – MRTPI

Spatial and Strategic Planning Manager – Sustainable Growth

c.c. contactegl5@nationalgrid.com



Anglian Water's Non-Domestic Water Requests Policy

December 2024

1.0 Executive Summary

The East of England is the driest part of the country and climate change is making summers hotter and drier. To help protect the environment, the Environment Agency (EA) is reviewing abstraction licences and reducing the amount of water that businesses including Anglian Water can abstract from the environment. As a result, **the gap between the demand for water and our supply (aka headroom) has shrunk.**

This situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the Water Resources Management Plan (WRMP).

To respond to both this challenge, and a growing population, Anglian Water is building a new strategic pipeline to move water around our region. We have also developed plans to build two new reservoirs to increase water supply. These solutions will take time to deliver, and so it is more crucial than ever that all homes and businesses are water efficient, to reduce the overall demand for water, to meet government targets and to ensure there is enough water to go around.

2.0 Background

2.1 Anglian Water

Anglian Water serves 20% of the total landmass of England and Wales and covers the largest geographical area of any water company. The Anglian Water region is the driest area in the country, receiving around two thirds of the average national rainfall. The population in the East of England has increased by 8.3% between 2011-2021, according to census data, which is the highest rate of growth in the UK. At Anglian Water we are committed to catering for this population growth and subsequently enabling growth in the economy. Agriculture and agri-food processing are vital industries in the East of England and require high volumes of water.

2.2 The EA's Abstraction Reduction Strategy

Water abstraction from the environment provides essential water for public water supply, agriculture and industry. However, unsustainable levels of abstraction impact the ecology and resilience of our rivers, wetlands and aquifers. Having the right flow in our rivers and protecting groundwater levels is essential to supporting healthy ecology, enhancing natural resilience to drought, and ensuring that rivers continue to support recreation and wellbeing. The Environment Agency (EA)'s abstraction reduction strategy is therefore essential for the health of our environment, but it does present some challenges for both ourselves and other businesses, especially as changes have been made to the EA's approach since we developed our last long term water resources management plan.

We also had three public water supply groundwater licences which required closure by June 2024. A further two public water supply groundwater sources have been identified at potential risk of closure by 2030. This, as well as the other pressures on our water supply, adds even greater pressure to the gap between demand for water and our ability to supply.

2.3 Water Resource Management Plans (WRMPs)

Every 5 years water companies create a WRMP which sets out how water companies intend to achieve a secure supply of water for customers and a protected and enhanced environment. This includes consideration of which abstraction licences are being reduced or removed and predictions for requirements from new homes and businesses. There have always been requests for new or increased water connections after the WRMP has been drafted and we build in an element of flexibility into the plan for unforeseen changes. However, due to the changes in the EA's abstraction reduction strategy the number of requests received by Anglian Water for non-domestic connections has increased in the last year as business are also having their licences reduced or revoked, or simply cannot access any other source of water. At the same time we have seen new requests related to the 'onshoring' of production following Brexit and other supply chain issues, as well as new demands relating to net zero ambitions.

3.0 How can Anglian Water Help?

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

Although Anglian Water do not have a statutory obligation to supply water for non-domestic purposes, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market. However, as described above, the situation is now changing, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) AW will need to decline the request for more water, in order to protect existing supplies and the environment.

4.0 What can your water retailer do to help?

The water retailer is the main point of contact for any water related issues or advice a business might need. We would always advise businesses contact them first and foremost to discuss water supply. Water retailers can provide information, including on how to become more water efficient and make the water you already have go further.

5.0 What can businesses do to help?

The cheapest and most sustainable solution to the region's water resource problem is to collectively reduce our water consumption. Water efficiency measures can be an extremely effective way to free up water resources for business expansion or new connections. Anglian Water have an ambitious smart metering roll out programme across the region for all homes

and businesses which help customers change their behaviour and become more water efficient. For our largest business customers, we offer smart meter data down to 15-minute intervals.

Water efficiency audits should be undertaken before new water supplies are requested. This could include installing water efficient devices (e.g., aerated taps and shower heads, low flush or air flush toilets) and efficient white goods (e.g., dishwashers and washing machines). Water demand can also be reduced through fitting smart meters, which measure water usage and provide regular readings, helping to identify leaks and tracking water consumption. Meters can also help support and encourage behavioural change.

In many cases, water reuse can also be a good option for reducing demand for water. Water reuse generally refers to the capture, treatment (if required) and use of alternative water supplies for non-potable purposes. It includes rainwater and surface water harvesting, greywater recycling and wastewater recycling. Water reuse technologies have the potential to save significant amounts of water, especially in situations where non potable water could be used in production.

6.0 What we need from government?

There are several things Anglian Water is calling on the government to do to help address this challenge and protect water resources:

1. Include every sector in a national campaign to reach the 20% water demand reduction target published in the Environment Act 2021.
2. Introduce a mandatory water efficiency labelling system for water using products, similar to the scheme already in place for energy using products.
3. Tighten building regulations and enforcement so that new homes are built to ambitious water efficient standards, as set out in the government's EIP (Environment Improvement Plan) 2023.
4. Make a commitment to link water efficiency with existing and new energy efficiency policies and retrofitting programmes.
5. Recognise the need to create new headroom to enable non-domestic growth.
6. Support us in delivering large scale strategic water resources options (for example, Anglian Water's two new reservoirs and new pipelines).

Water Resource Assessment

The need for a Water Resource Assessment

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

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

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

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

Water Resource Assessment (WRA)

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

1. Contact and project details

Applicant name	
Applicant address	
Applicant contact name	

Applicant contact email	
Applicant contact phone number	

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

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

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

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

2. Existing site supply and discharge (if applicable)

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

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

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

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

Water demand

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

4. Water efficiency measures

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

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

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

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

From: clerk@bilsbyfarlesthorne-pc.gov.uk
To: [Eastern Green Link 5](#)
Subject: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation
Date: 28 September 2025 12:33:08

Bilsby & Farlesthorne Parish Council **OPPOSES** National Grid's current plans under the proposed Eastern Green Link 5 project.

The current plans will have a huge negative impact on the landscape and residents living in and around Bilsby and the surrounding towns / villages, and any Environmental Statement and Scoping Opinion **must** address the concerns outlined below at the level of detail that provides reassurance to the Parish Council, and residents of Bilsby and surrounding villages.

The Environmental Statement must also ensure a robust assessment of alternative options that minimises the impact of the proposed project on the environment and residents. Any such review must include a thorough alternative appraisal (strategic and route level) including subsea / HVDC and undergrounding **AND** a full cumulative assessment with other National Grid schemes affecting Bilsby, the surrounding towns / villages and across Lincolnshire.

National Grid's proposals, including a substation, converter station and overhead power lines will have a devastating impact of the rural landscape in and around Bilsby and the surrounding area, the quiet enjoyment of rural life of residents and the huge negative ecological impact throughout Lincolnshire.

The infrastructure in and around Bilsby, with its small country roads, will not be able to cope with heavy construction traffic over potentially many years. The inevitable disruption to residents, damage to property caused by vibration from HGVs, impact on air quality due to pollution and increased traffic, increased dust and noise, the interruption to the daily lives of residents and the impact on vital visitor numbers into the community, will have a devastating impact on the local economy.

The impact of the size of the proposed buildings will dominate the landscape and destroy the open views across the Lincolnshire Wolds enjoyed by many residents. The nighttime impact of huge buildings being lit up and the noise coming from the buildings 24 hours a day could cause significant distress to the majority of residents.

The Environmental Statement must carry out a full hydrogeographic assessment of all the proposed sites to ensure there is no detrimental impacts on drainage or current levels of flood risk. There have been a number of concerns raised about potential flooding in and around Bilsby caused by construction activity.

Bilsby is a rural village and is surrounded by a number of other small towns and villages, many of whom have Grade 1 Listed Buildings and other historic buildings. The potential for damage to these historic buildings or impacts of reduced visitor numbers due to many years of major construction works could have an impact of keeping these buildings open in the long term.

The impact of the proposals on daily rural life in and around Bilsby is a huge concern. The risk to tourism, small businesses, community events and ultimately the health and wellbeing of residents.

Bilsby & Farlesthorne Parish Council would like all the above concerns addressed as

part of any Environmental Statement.

On behalf of Bilsby & Farlesthorne Parish Council

Regards

[Redacted]

[Redacted]

Parish Clerk & Responsible Financial Officer
Bilsby & Farlesthorne Parish Council

Email: clerk@bilsbyfarlesthorne-pc.gov.uk

Address for correspondence:

The Red House
3 St Margarets Close
Huttoft
Alford
LN13 9RU

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

Dear Sir or Madam,

Re: EN0210010 - Application by National Grid Electricity Transmission plc (the applicant) for an Order granting Development Consent for the Eastern Green Link 5 (the proposed development).

EIA Scoping Consultation under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Thank you for your consultation request under regulation 10(6) of the EIA Regulations. East Lindsey District Council (ELDC), as a consultation body and host authority, wishes to make the following comments in regard to the information provided within the Environmental Impact Assessment (EIA) Scoping Report.

Introduction

The Project consists of an offshore high voltage electricity link (offshore infrastructure in English Waters) between Scotland and England with associated onshore infrastructure.

The onshore infrastructure in ELDC will consist of a transition joint bay and landfall, Converter Station, onshore underground Cables and connection into a new Substation. The underground HVDC cables are proposed to run from landfall at Anderby Creek to a converter station for an approximate length of 9 km, either located to the north-east of Bilsby or north-west of Huttoft. A HVAC cable would then continue from the Converter Station to connect to a new Substation (Lincolnshire Connection Substation B part of separate NGET project G to W) for an approximate length of 3 km.

Since the non-statutory consultation, the Order Limits have been expanded to accommodate the Alford Bypass Construction Route. NGET describe this element as *'a temporary construction traffic route departing from the road network around the north of Alford'*. Its location is described as *'the westernmost section of the English*

Onshore Scheme Scoping Boundary, commencing southwest of CS05 and traversing north of Alford, between the A1104 (East Street) and the A1104 (Station Road).’

The EIA Scoping Response does not reflect the views of the County Council and nor does it make comments upon matters that are the County Councils Statutory Function such as acting as Local Highway and Transport Authority, Minerals & Waste Planning Authority and Lead Local Flood Authority. There is also agreement with the County Council, that they will act on the Districts behalf in relation to Archaeology matters.

In producing this EIA Scoping Response, ELDC has not sought directly the views of the public or local interest groups as to any particular matters that should be reflected in the EIA Scoping Response.

This representation sets out in the first section the relevant local planning policy and comments upon the EIA Scoping Report submitted by the Applicant and the second part Appendix A includes the Landscape and Visual comments from AAH Landscape Consultants.

Local Planning Policy Context

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

- Strategic Policy 10 (SP10) – Design.
- Strategic Policy 11 (SP11) – Historic Environment.
- Strategic Policy 16 (SP16) – Inland Flood Risk.
- Strategic Policy 17 (SP17) – Coastal East Lindsey.
- Strategic Policy 23 (SP23) – Landscape.
- Strategic Policy 24 (SP24) - Biodiversity and Geodiversity.
- Strategic Policy 25 (SP25) – Green Infrastructure.
- Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy
- Strategic Policy 28 (SP28) – Infrastructure and S106 Obligations.

ELDC Comments on EIA Scoping Report

General Comments

Regulation 10 (3) of the EIA Regulations provides the list of information that a request for a scoping opinion must include and ELDC agree that this has been provided within the Applicants EIA Scoping Report.

ELDC wishes to reiterate the importance of the site selection process. ELDC wishes to see a clear presentation of how NGET have reached a chosen design to take forward to EIA and DCO application, and how stakeholder feedback and environmental constraints and opportunities have fed into this process. ELDC expect to see the

footprint of the project minimised as much as possible to avoid environmental impacts to sensitive receptors within East Lindsey. This is particularly important for the siting of the Converter Station.

Since the non-statutory consultation, the Order Limits have been expanded to accommodate the Alford Bypass Construction Route located to the '*southwest of CS05 and traversing north of Alford, between the A1104 (East Street) and the A1104 (Station Road)*.' ELDC wishes to reiterate that the environmental effect of the Proposed Development should include that of the Construction of the Alford Bypass Construction Route in relation to the environmental topics of the Environmental Statement (ES) (it is not clear to the District Council that reference to temporary haul routes includes specifically the Alford Bypass Construction Route).

ELDC notes the Applicant's desire to incorporate flexibility into their draft DCO and its intention to apply a 'Rochdale Envelope' approach for this purpose. Where the details of the Proposed Development are not defined precisely, the Applicant will apply a worst-case scenario, as set out at paragraphs 5.3.1 and 5.3.2 of the EIA Scoping Report. The Applicant should explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. The development parameters will need to be clearly defined in the draft DCO and in the accompanying ES.

ELDC also notes that there is further design refinement work of the cable route, locations of construction compounds and the location of the converter station to be carried out. If the design refinement results in the cable route and their construction corridor or the siting of the Converter Station being altered or move significantly within the Scoping Boundary, then effects scoped in or out should be reviewed. This should be considered as the EIA process develops.

In addition, the current Scoping Boundary would be located within the setting of the Lincolnshire Wolds National Landscape (albeit the closest element being the Alford Bypass Construction Route) and the effects are somewhat dependent upon the final design refinement of the siting of the Converter Station. ELDC consider that it is premature to scope out effects upon the National Landscape at this stage (change in the views and perceptual qualities of Lincolnshire Wolds National Landscape during Construction and Operation). This should be considered as the design is refined, and the EIA process develops.

Agricultural Land

ELDC wishes to see the minimisation of impacts whether short, medium, or long term upon the agricultural resource within the District, as per National Policy Statement for Energy (EN-1), minimisation of impact to Best and Most Versatile agricultural land. ELDC wishes to see any permanent loss of agricultural land at the converter substation site minimised through the site selection and design phases.

ELDC expect that the handling, storage and reinstatement of soil should be carried out in accordance with a Soil Management Plan (SMP) which sets out good practice mitigation to minimise temporary adverse effects on the soil resource.

There is also the potential for adverse impacts to farming practices through the temporary loss of land availability, restricted access and disruption caused by temporary working areas and construction traffic, as well as to the soil resource itself. This should also be considered within the ES.

Landscape and Visual

The District Council have commissioned AAH Landscape Consultants to provide landscape and visual support for the EGL 5 Project. AAH Landscape Consultants have provided feedback and advice to the Council upon the EIA Scoping Report. A full copy of the report prepared by AAH Landscape Consultants is attached at Appendix A which has reviewed the EIA Scoping Report. Appendix A should be read in conjunction with and taken as part of the District Councils EIA Scoping Response.

Air Quality, Noise and Vibration

The approach to the identification of Sensitive Receptors and monitoring locations for baseline monitoring should be agreed with all relevant stakeholders (in particular Environmental Health Officers) prior to any further development of the assessment.

ELDC note reference only to the construction phase noise assessments. Where the route passes close to noise receptors, an assessment of the operational noise impact will be required. We also note that low frequency noise from operation “hum” or similar has been discounted owing to noise being low frequency. We have concerns that the local authority may need to investigate allegations of low frequency noise in line with the Salford University guidance for complaints of this nature arising from the operation in the future. This has been the case with many other developments such as on shore wind farms which we have had to determine if noise is so significant as to affect nearby residents to the commissioned facility. Such investigations are significantly time consuming and take a significant amount of resource to investigate thoroughly.

ELDC welcome the future submission of detailed assessment of air quality impacts from traffic movements during construction on the identified vulnerable receptors as well as the assessment of significant effects from Non-Road Mobile Machinery on local air quality.

Land Contamination

Where construction activities are proposed at locations identified being of moderate or high contamination potential, we would expect that suitable and sufficient site-specific risk assessment was undertaken to ensure a safe development, following the principles of investigation as set out in the Environment Agency guidance ‘Land contamination risk management (LCRM)’. Proposals for risk assessment,

investigation, and remediation (or not) should be agreed in advance with the Environmental Protection Team at ELDC.

Cultural Heritage

Paragraph 7.6.2 confirms that there is no list of cultural heritage receptors which may be subject to significant effects and also confirms that this will be done following the development of a ZTV.

Paragraph 7.6.5 also states that there are a number of potential effects that have been scoped out and table 7.5 summarises those matters scoped out and those scoped in.

ELDC also notes that there is further refinement work of the cable corridor route, locations of construction compounds and the location of the converter station to be carried out. Whilst these are uncertain, ELDC considers it is premature to rule out likely significant effects for temporary effects during construction arising through change within the setting of designated and non-designated heritage assets. ELDC therefore disagrees with the scoping out of this effect.

ELDC agrees that direct effects on assets outside of the scoping boundary can be scoped out of further assessment as there is no pathway for such direct effects however this should be reviewed if the cable route and their construction corridor or the Converter Station are altered to move significantly closer to the Scoping Boundary. This should be considered as the EIA process develops.

ELDC agrees that effects of repairs to above ground infrastructure or buried cables during the maintenance phase for designated and non-designated heritage assets; historic landscape character can be scoped out of further assessment.

Socio-Economic

Table 15-12 summarises those matters scoped out and those scoped in, with respect to socio-economics, recreation and tourism.

As previously referenced ELDC notes that there is further refinement work of the cable corridor route, locations of construction compounds and the location of the converter station to be carried out. Whilst these are uncertain, ELDC considers it is premature to rule out likely significant effects for temporary or permanent disruption to access and / or land take and / or amenity effects for businesses and development Land during construction and operation. ELDC therefore disagrees with the scoping out of this effect.

Construction Activities

ELDC would like to understand further the likely construction durations for each element of the Proposed Development, currently the onshore section of the programme is not clear for landfall, cable route, converter station and national grid connection works to Lincolnshire Connection Substation B.

ELDC would welcome the submission of a detailed construction and environmental management plan and supporting documents in due course, to reduce impacts to vulnerable receptors from noise, dust, artificial light from temporary site lighting/vehicle driving & working lights and any other more permanent fittings for the duration of the project and emissions from all sources related to the project. This should include the steps to be taken to achieve the reduced impact and details of compliance monitoring to ensure those steps taken are effective.

Cumulative Impacts

ELDC welcomes confirmation at paragraph 5.9.1 that a CEA will be carried out. ELDC consider that such an assessment as well as considering the cumulative effects of the environmental topics also it will need to pay particular attention to:

- The potential for the EGL 3 & 4 landfall and cable corridor construction activities to coincide with those of EGL 5.
- The potential for G to W Construction particularly the Lincolnshire Connection Substation B (but not limited too) construction activities to coincide with the construction of the Converter Station of EGL 5.

The ES should include all different types of development which may lead to a cumulative impact, not just those which are similar in nature to the Proposed Development. ELDC expect to be consulted upon the scope of projects to be included with the CEA as part of the ES.

Conclusion

This document provides comments by East Lindsey District Council on the Eastern Green Link 5 Environmental Impact Assessment Scoping Report (September 2025, document reference EGL5-NGET-CONS-XX-RP-YL-006), requested by the Planning Inspectorate on the 2ND September 2025 (Reference EN0210010).

If you have any queries, please do not hesitate to contact the case officer Joe O'Sullivan. Many Thanks

Yours Faithfully

[Redacted Signature]

[Redacted Name]

Nationally Significant Infrastructure Projects Manager

Enc. Appendix A

Technical Memorandum 1: AAH TM01

South & East Lincolnshire Councils Partnership; Eastern Green Link 5 Landscape and Visual Scoping Opinion

This Review has been carried out by AAH Consultants (**AAH**) on behalf of South & East Lincolnshire Councils Partnership (**SELCP**) and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following Eastern Green Link 5 documents:

- *Volume 1: Main Text Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006;*
- *Volume 2: Appendices Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006;*
- *Volume 3: Figures: Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006.*

While the focus of this review is on Landscape and Visual matters, other information provided within the Scoping Report, and any associated Appendices, has also been considered, providing background and context to the site. This review covers the elements of the “*English Onshore Scheme*” only. As the project is at an early stage, the Order Limits have yet to be defined, with the information presented within the applicants Scoping Report based on the Onshore Scoping Boundary. Paragraph 4.3.5 clarifies that to “...retain flexibility, a Scoping Boundary for the English Onshore Scheme has been defined to represent the maximum extent of development”. As identified in the Glossary: “Following the receipt of a Scoping Opinion and further design development, the Project Scoping Boundary will be refined and replaced by the Order Limits.”. Therefore, due to this iterative process of refinement, there will need to be further consultation with the applicant in regards to agreeing the final content and detail of the landscape and visual elements of the submission.

We expect the production of a Landscape and Visual chapter to be included within the Environmental Statement (**ES**), which would be in the form of a Landscape and Visual Impact Assessment (**LVIA**), which should, along with any supporting information (such as plans, photographs, visualisations or figures), reflect current best practice and guidance from, as a minimum, the following sources:

- ‘Guidelines for Landscape and Visual Impact Assessment’, (**GLVIA3**), April 2013 by the Landscape Institute (**LI**) and Institute of Environmental Management and Assessment (**IEMA**);
- ‘An Approach to Landscape Character Assessment’, Natural England (2014);
- ‘Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals’, 17th September 2019 by the Landscape Institute (**LI**);
- ‘Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)’, 10th January 2020 by the Landscape Institute (**LI**);
- ‘Technical Guidance Note (TGN) 04/20 Infrastructure’, April 2020 by the Landscape Institute (**LI**);

- ‘*Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations*’, May 2021 by the Landscape Institute (LI); and
- ‘*Technical Guidance Note (LITGN) 2024-01 Notes and Clarifications on Guidelines for the Landscape and Visual Impact Assessment Third Addition (GLVIA3)*’, August 2024 by the Landscape Institute (LI);

Overall, we would expect that the assessment of potential Landscape and Visual effects and evolving proposals relating to the scheme, as a Nationally Significant Infrastructure Project (**NSIP**), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with SELCP and other appropriate stakeholders:

- LVIA Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (**AVRs**):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (**RVAA**) or initial Survey should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

The following should be considered in the evolving assessment and layout:

Viewpoints and Photomontages

A list of 29 viewpoints is proposed within *Table 8-5: Selected viewpoints and photomontages*. Of these viewpoints, several are proposed to be developed as photomontages which will primarily focus on the converter station. No photomontages are proposed to cover the landfall, underground HVDC or HVAC cable corridors, or along the Alford Bypass Construction Route. This approach is reasonable, and we would anticipate that landscape and visual effects associated with these underground elements would be limited to the construction phase. The initial viewpoint locations appear reasonable and provide for a variety of receptors and views, however until the Order Limits are refined, and additional information is put forward for the cable corridor and Converter Station location, we cannot agree these at this stage.

Therefore, due to the evolving design, the final locations of viewpoints are to be reviewed and subsequently agreed with SELCP and other relevant stakeholders. The final viewpoint selection should consider views of taller and more conspicuous elements, once the scheme layout is more developed, as well as consider potential

key, or sensitive, viewpoints or visual receptors. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant team in regards to proposed viewpoints.

To gain an understanding of the visibility of the scheme and how the development would appear in the surrounding landscape, Photomontages/AVRs should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with SELCP and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type, as well as which viewpoints would be developed as photomontages, is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The overview of the proposed methodology provided at Section 8.7 is typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the full methodology is provided to allow further interrogation and comment at the next phases of the project.

Scope of the Study Area

It is acknowledged in *Paragraphs 8.4.1 to 8.4.4* that an initial study area of 3km from the English Onshore Scheme Scoping Boundary has been allowed for. At this early stage, we recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and there is the potential that visibility beyond these study area extents may ultimately be identified.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

A range of published landscape character assessments have been identified in *paragraph 8.4.5*, from National Landscape Character Areas to regional and local assessments. Further detail on these character areas is provided in paragraphs 8.4.10 to 8.4.23, and several landscape designations in the study area are listed in paragraph 8.4.8 along with other potential landscape receptors in 8.4.9. These are subsequently utilised to form an initial list of baseline landscape receptors identified in paragraphs 8.6.6 and 8.6.7, however as the scheme progresses and designs are refined, we recommend these are reviewed. To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and needs to include both relevant published landscape character assessments and the LVIA authors own judgements of the landscape character of the site and study area

should this vary from published assessments. This potentially should include a finer grain landscape character assessment that considers individual landscape elements or features that make up the wider character, particularly where permanent areas of above ground infrastructure are proposed such as the converter station siting area, and the proposed landfalls.

Visual

The visual baseline is considered in paragraph 8.4.24, and a range of initial visual receptors are identified within *paragraph 8.4.25*. The visual receptors are subsequently detailed in paragraphs 8.6.9 (Residential Receptors) and 8.6.10 (Recreational Receptors). However, at this early stage of the project we request these be reviewed, refined and consulted upon further once proposals have been developed: we are not in a position to confirm their inclusion or omission at this stage. No transport receptors have been identified.

We would expect that the visual assessment would clearly identify the visual receptors, which would subsequently be the focus of the visual assessment. The LVIA should not just contain an assessment of any agreed viewpoints, it must focus on receptors. The viewpoints are to illustrate the visual effects, and the visual assessment should clearly reference receptors to representative viewpoints to aid this.

The visual assessment should take account of the 'worst case scenario' in terms of maximum parameters and winter views, including effects at construction, Operational Phase (year 1), Residual Phase with mitigation planting having established (10 to 15 years), and at the Decommissioning Phase.

Table 8-6: Receptors scoped in and out for further assessment identifies Employees and transport users are proposed to be scoped out of the LVIA. We would query this approach, and in particular transport users. We agree these are often of lower susceptibility to change, however can also include passengers in vehicles, cyclists and horse riders, which may have higher levels of susceptibility. We would expect these to be considered in any assessment.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular similar energy infrastructure or renewable energy developments, as appropriate in regards to proximity and scale. This should consider both Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects.

Residential Visual Amenity Assessment

Paragraph 8.6.9 of the LVIA identifies key residential receptors. Paragraph 8.8.1, bullet 2, identifies that the *“assessment of views from private properties will be based on representative viewpoints from publicly accessible locations and using professional judgement and is limited to LVIA and does not include Residential Visual Amenity Assessment”*. We disagree that residential visual amenity should be

scoped out of the assessment at this stage as it is currently unclear if there are residential properties with receptors likely to experience significant effects to their visual amenity. If there are potential significant effects, due to the scale of some of the above ground elements of the scheme, these may ultimately meet the visual amenity threshold and a Residential Visual Amenity Assessment (**RVAA**), based on the Landscape Institute TGN 2/19), may be required. The scale of the scheme has the potential to give rise to significant effects to local residents, including effects on residents private visual amenity. The layout should also respond to potential views and proximity to any properties to mitigate any potential adverse effects.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect any landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have a negative effect such as appearing out of character or foreshortening open or panoramic views. A Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

██████████ CMLI
AAH Landscape

██████████ [@aahconsultants.co.uk](mailto:██████████@aahconsultants.co.uk)
www.aahconsultants.co.uk

25th September 2025

Planning Inspectorate

EasternGreenLink5@planninginspectorate.gov.uk

Your ref: EN0210010

Our ref: XA/2025/100455/01

Date: 30 September 2025

Dear Sir / Madam

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

Application by National Grid Electricity Transmission plc (the applicant) for an Order granting Development Consent for the Eastern Green Link 5 (the proposed development) Scoping Report Consultation

Thank you for referring the above Scoping Report consultation which was received on 02 September 2025.

The Environment Agency has reviewed the *Eastern Green Link 5 - Environmental Impact Assessment Scoping Report (Volume 1: Main Text)* undertaken by National Grid for the above scheme, referenced EGL5-NGET-CONS-XX-RP-YL-006 accompanied by appendices and figures.

We have the following comments to make regarding the proposed scope of the Environmental Statement (ES).

For the topics within our remit, we broadly agree with the topics that have been scoped in. We further recommend inclusion of the following detailed advice that we have addressed in Appendix A in issue/impact/solution format.

There are currently topics proposed to be scoped out, which we consider should be scoped in which are addressed below and discussed in detail in Appendix A and highlighted in bold:

- Flood risk & Modelling – Impact on vibrations on flood defences
- Groundwater & Contaminated Land – Heating effects of onshore cables / chalk streams to be considered
- Water Quality – Foul water strategy/ Soil stripping and earthworks/ Operational surface water drainage/ Operational physical disturbance and OEMP/ Runoff from impermeable surfaces/ Decommissioning/ Offshore spills

Final comments

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

██████████ (MRTPI)

Planning Specialist

Direct dial ██████████

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

Appendix A

Flood Risk & Modelling

We would recommend the impact of vibrations on flood defence assets to be scoped in.

Impact of vibrations associated with construction works on flood defence assets

Document Reference(s): Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025) – relevant to Chapter 9 Water Environment and Chapter 13 Noise and Vibration.	
Issue	Construction vibrations may impact on the structural integrity of flood defences.
Impact	Excessive vibration can cause damage, reducing the effectiveness and longevity of flood assets.
Solution	Monitor vibration levels during works and identify safe thresholds that do not adversely affect flood assets.
Additional information: We would like to highlight that the applicant will need to: • Survey the pre- and post- works condition of any flood defence assets they will be interacting with, and remediate any defects identified.	

Further clarification needed on elements proposed that are scoped in

Document Reference(s): Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Table 9-6 'Summary of likely significant effects on water environment receptors for each phase of the English Onshore Scheme'.	
Issue	It is not clear that the flood risk elements proposed to be scoped in cover: • The risk from all sources of flood risk • Will include the assessment of future flood risk, taking account of climate change • Acknowledge potential risks on site to proposed infrastructure and future site users, as well as to offsite receptors.
Impact	Failure to assess the full range of flood events possible within the development's lifetime and acknowledge the different receptors impacted could lead to an underestimation of risk and insufficient flood risk mitigation proposals.
Solution	Ensure that the flood risk impacts proposed to be scoped into the assessment account for the risk of flooding from all sources, include an assessment of flood risk accounting for climate change, and also consider both onsite and offsite impacts.

Additional information:

Assessing future flood risk accounting for climate change:

In accordance with paragraph 5.8.14 of NPS EN-1, the Flood Risk Assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking account of climate change. The applicant should refer to the GOV.UK guidance advice '[Flood risk assessments: climate change allowances](#)' for further information on how to assess future flood risk using the appropriate climate change allowances. The applicant should also identify the correct [flood risk vulnerability classification](#) for the proposed development to inform the assessment of climate change.

The applicant will also be expected to assess flood risk associated with the [credible maximum climate change scenario](#). This should be treated as a 'sensitivity test'. This will ensure the development can be adapted to large-scale climate change over its lifetime and should be used to inform future decisions regarding the decommissioning of certain aspects of the proposed scheme.

Please note that, in line with the [Planning Practice Guidance for Flood Risk and Climate Change](#), non-residential/commercial development is considered to have a lifetime of 75 years as a starting point, which is the lifetime we recommend the applicant based their assessment of climate change on.

Beach Renourishment Plans

Document Reference(s): Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 18 and 19

Issue	We have concerns that the offshore works and landfall location could have the potential to impact on the delivery and costs of important Environment Agency flood risk management works. Every year, we invest in artificially nourishing the beaches from Saltfleet to Gibraltar Point, which not only helps to reduce the risk of flooding for Lincolnshire's coastal communities but also retains the appearance of the sandy beach. Additionally, the beachline along the coast act as a vital defence between the sea and man-made coastal defences.
Impact	If not designed and phased correctly, proposed works could lead to deterioration of beaches and cause adverse impacts on current coastal defences.
Solution	We must ensure additional measures are in place for the continued protection of our assets. In line with other similar schemes, we will require the applicant to enter into a legal agreement with us to ensure the installation of any export cables and the construction of the project does not adversely affect the annual nourishment work, resulting in delays and additional cost to us and an increased risk of tidal flooding along the Lincolnshire Coast.

Interference with Environment Agency flood defence assets (not just from vibration)

Document Reference(s): Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 9 Water Environment	
Issue	Construction works may affect the condition of existing flood assets
Impact	Damage or degradation of defences could compromise their ability to manage flood risk, leading to increased flood risk during or after construction.
Solution	The applicant should provide full details of all flood defences and associated assets within the study area. This should include their current condition, crest levels and standard of protection. This will allow assessment of potential impacts to defences and any mitigation required, taking the development and climate change into account, to ensure that flood risk is not increased over the proposed development lifetime. The applicant must also survey the pre- and post-works condition of any assets they will interact with and remediate any defects identified.

Additional Information:

Sequential approach to site layout

In accordance with the National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking account of all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, and if there are any opportunities for development to be located outside of Flood Zones 2 and 3 this should be prioritised. A sequential approach should be taken to any site layout decisions within the site boundary, locating the most vulnerable elements of the development to areas of the lowest risk. The most vulnerable development may be any equipment that would be damaged by flood waters.

No loss of floodplain storage

Any land raising or increase in built footprint (permanent or temporary) within the 1% AEP plus an appropriate allowance for climate change flood extent can lead to an increase in flood risk elsewhere and floodplain compensation would be needed for any loss of floodplain storage within this flood extent. Floodplain compensation should be provided on a level-for-level and volume-for-volume basis. We would recommend avoiding storing any materials in the floodplain wherever possible.

Main river crossings

We recommend minimising the number of main river / watercourse crossings wherever possible.

Crossing register

As the proposal develops it would be beneficial to have a Crossing Register with the proposed crossing placement and type.

Culverting and removal of culverts:

We are opposed to the culverting of any watercourse and instead prefer the installation of a clear-span bridge crossing. This is in line with the Environment Agency's anti-culverting policy.

Bridges design requirements:

- Soffit height of the bridge must be a minimum of 600mm above the 1 in 100yrs + climate change allowance flood level
- All abutments must be set back a minimum of 1m from the top of bank and as minimal as possible
- Any loss of floodplain due to abutments and ramps will need to be compensated for.
- All parapets and railings need to be permeable and open as possible with a minimum of 100mm spacing.

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.

Underground crossings

We support the use of Horizontal Directional Drilling. Any crossings below a main river should have a 5m or greater depth below the riverbed level.

Flood Risk Activity Permits/ Disapplication

Disapplication (Protected Provisions)

A number of permits and licenses may be required to facilitate this scheme.

Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission.

We will require a consenting strategy document to be submitted in support of the proposals which outlines a programme of managing the various consents and permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits.

We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO.

Please refer to PINS Annex D advice note for further information on how the Environment Agency's planning and permitting process can be best aligned within DCOs: [Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex D: Environment Agency - GOV.UK](#).

Permitting pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

Flood risk activity permits

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- On or within 8 metres of a main river (16 metres if tidal)
- On or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- On or within 16 metres of a sea defence
- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already 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 has been granted, and we advise them to consult us at the earliest opportunity.

If any of the works are likely to require a FRAP under the Environmental Permitting Regulations 2016, we recommend that the applicant informs the Environment Agency whether they are seeking disapplication at the earliest opportunity.

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.

Modelling

Document Reference(s): Section 9.4.33 Flood Risk and Land Drainage EGL 5 Converter Station Siting Zones page 273.	
Issue	Gaps in flood risk evidence
Impact	Flood risk impacts to and from above ground infrastructure could be underestimated.
Solution	Please consider watercourses where gaps in flood risk modelling evidence may exist. Smaller watercourses which have no associated Flood Zone mapping may present both a source and pathway for flood risk to new development.
Additional information: This section describes how the majority of land within the two converter station siting zones is at low risk of flooding, although some areas, notably a portion of CS05 are in Flood Zone 2 and 3. Based on an inspection of the Flood Zones this is correct although please note that several drainage ditches cross CS05 and CS06 that have no associated Flood Zone mapping due to the small size of their respective catchments (<3km ²). These drainage ditches may act as flood risk pathways and there may be flood risk associated with these watercourses, it is just not modelled and mapped as a catchment area of 3km ² was the de minimis in the national 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available.	

Document Reference(s): Section 9.4.6 Gathering Data Methodology page 270	
Issue	Existing modelling data may be old and outdated
Impact	Fluvial and coastal flood risk impacts could be underestimated
Solution	Please check any third-party modelling information you use to ensure it is up to date and representative of current and future baseline conditions.
Additional information: This section describes how data requests will be made for flood modelling data which will be incorporated into future stages of the assessment. Please note, it is important to check that any Environment Agency modelling data that you do use is suitable for your needs and representative of current and future baseline conditions. Whilst we do hold a hydraulic model for the Wold Grift Drain which bisects the order limits and for the coast, some of the	

data which is used to inform this may be out of date, for example boundary conditions and climate change uplifts. Please refer to the following guidance which is available online when using existing Environment Agency hydraulic models for Flood Risk Assessments [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments)

Additional Information:

Likely significant effects, construction phase Section 9.5.4 page 276.

This section notes that the English onshore scheme will require crossings of multiple ditches, drains, and watercourses. The design of these crossings will be dependent on the size and sensitivity of the watercourses. For main rivers and those with Water Framework Directive (WFD) status, clear span bridges will be used. This is welcomed. Any proposed crossings should be designed so that the soffit level sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme, depending on the period for which these are in place it may be possible to use the present day (without climate change) 1% (1 in 100) AEP scenario although for longer periods of time climate change should be considered. In terms of determining flood levels at crossings, the Mannings equation could be used in the case of open span crossings over small ordinary watercourses. Where culverts are used the methods prescribed within the CIRIA Culvert Screen and outfall manual (C786) may be a useful reference to help determine appropriate sizing although it may be easier to develop simple 1d hydraulic models to understand the impact on water levels and to size crossings appropriately.

Section 9.7.1 Assessment Methodology further data to be gathered/processed page 281 and Chapter 23 Marine Physical Processes table 18-5 page 517.

The following additional datasets and guidance may also be of interest. The Environment Agency's *Coastal Standards Technical Report LIT 56561 (2022)*, particularly regarding future wave conditions and climate change allowances. The NCERM (National Coastal Erosion Risk Mapping) may be of interest. This can be obtained here: [National Coastal Erosion Risk Mapping \(NCERM\) - National \(2024\)](https://nationalcoastalerosionriskmapping.org/). Finally, the Surf Zone dataset 2019 may also be of use which is available here. <https://environment.data.gov.uk/dataset/77e6f743-d708-4909-a80f-9510b7dbaa16>.

Chapter 18 Marine Physical Processes - Water levels Section 18.4.51 page 528.

This section describes how UKCP18 suggests increases in sea level of more than 0.7 metres are possible by 2100 along the Lincolnshire Coast. This is correct for the Higher Central Scenario. Please note it is also important to consider the potential implications that more extreme climate change will have on sea level and the proposed development, for example in the Upper End and H++ scenarios. Further guidance on which climate change allowances to apply for essential infrastructure and Nationally Significant Infrastructure projects can be found online at: [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances)

Groundwater & Contaminated Land

Report & Section	Scoping Report Volume 1 - Section 4.3.30
Issue	Proposal to use chemicals “typically categorised as” posing “little or no risk”.
Impact	Potential use of some chemicals which do not meet this categorisation.
Solution	Confirm all chemicals are categorised as posing “little or no risk” or give details of strict controls which will be used for any that fall outside of this description.

Report & Section	Scoping Report Volume 1 – 4.3.79, 4.3.80, 4.4.56, 5.4.16, 5.4.17, 5.4.23, Table 5-1 (Decommissioning)
Issue	No measures taken to facilitate removal of Converter Station or cables at decommissioning, or during maintenance if required. Potential short-term effects to hydrogeology are stated but not fully detailed or considered (Table 5-1) and no mitigation proposed.
Impact	The most environmentally sensitive options for decommissioning might not be viable at the time if measures are not considered at this stage. Potential unacceptable risks to hydrogeology from cables left in situ.
Solution	Provide outline procedures for decommissioning, based on current designs and guidance. This should include risks to groundwater and land, based on both cables being left in situ indefinitely, and cables being removed.
Additional Comments	There is inconsistency in the proposed long-term use of offshore and onshore cables. The licence for offshore cables currently only extends for 40 years, after which it would need to be decommissioned if an extension cannot be obtained (Section 4.4.56). Onshore cables would be used “as long as there is a business case” and “any decommissioning activity would occur decades into the future” (Section 4.3.80). If the offshore cables are removed after 40 years, we are unclear if there would still be a business case for use of the onshore cables “in perpetuity” (Section 5.4.23). Furthermore, in 4.3.79 there is discussion of replacing assets when they come to the end of their lifespan. An estimated lifespan for buried onshore cables is not given, but there is a suggestion they will not function indefinitely. While decommissioning works may not present “any greater environmental risk than any assessed impacts from the construction phase” (Section 5.4.17), there may be risks from not doing any decommissioning which have not been considered.

	We do not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that the applicant considers and documents the various effects of cables being left in situ permanently or being removed. The applicant should refer to regulatory guidance and general best practice at the time of decommissioning. Whilst the current intention may be for these to be left in the ground, we strongly recommend that the applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it be later deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved.

Report & Section	Scoping Report Volume 1 – Sections 4.4.50 to 4.4.52 and Table 10-10
Issue	Heating effects of cables only considered for offshore works. Heating effects of onshore cables not considered.
Impact	Potential impacts to controlled waters and other receptors due to heat emissions from onshore buried cables.
Solution	Undertake a heat assessment for onshore cables, such as that outlined in Section 4.4.52 for offshore works. <i>We request that this should be Scoped In (Chapter 10).</i>
Additional Comments	Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651: “‘pollutant’, in relation to England, means any— a. substance, b. heat, or c. biological entity or micro-organism, which is liable to cause pollution;” We are mindful there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables. The Environment Agency’s Chief Scientist’s Group has published a report for Ground Source Heating and Cooling (GSHC) systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a ‘thermal plume’ was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an

	equivalent benchmark could be considered when assessing heat pollution from underground HV cables. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means. At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater, to be considered further via desk-based assessment.

Report & Section	Scoping Report Volume 1 - Table 9-5
Issue	Groundwater is not given as a receptor for drilling fluid breakout.
Impact	Risks to groundwater may not be appropriately considered.
Solution	Ensure groundwater, aquifers, abstractions and Source Protection Zones are all considered in the drilling fluid breakout plan.

Report & Section	Scoping Report Volume 1 – Section 10.6.5
Issue	Source protection zones are not listed as a receptor in this section.
Impact	Specific risks to source protection zones may not be adequately considered.
Solution	Ensure source protection zones are always considered as a hydrogeological receptor in their own right, in addition to those listed.

Report & Section	Scoping Report Volume 1 – Table 10-11
Issue	The sensitivity rankings are incomplete. Some receptors are only partially defined. (see Additional Comments).
Impact	Sensitive receptors might be overlooked if sensitivity is not defined.
Solution	Ensure all receptors, and all subdivisions thereof, are included in any future classification tables, and any risk assessments completed using these.
Additional Comments	SPZ2 and SPZ3 are not included in sensitivity ranking. As these are in catchments which ultimately could reach a potable abstraction, we suggest that the description for “High” might be most appropriate. This affects a large part of the study area.

	Agricultural land use, including that used for food, is not given a Geology sensitivity. Residential, public open space, industrial and commercial are all included. A large part of the study area is agricultural, so this should be considered. We note that water used for agriculture is Medium Hydrogeological sensitivity. We disagree with inclusion of “WFD Poor chemical status” in the definition of a Low sensitivity Hydrogeological receptor. A WFD groundwater body with Poor status is not necessarily less sensitive than one with a Good status. This should not be used to justify a lower significance of impact. Furthermore, this does not preclude the fact the whole study area is underlain by Principal aquifer, which is defined as High sensitivity.

Report & Section	Scoping Report Volume 1 – Chapter 9 and Chapter 10
Issue	The applicant has not specifically considered chalk streams in this report.
Impact	Potential unacceptable risks to chalk streams if these are not considered.
Solution	Ensure chalk streams are included in further assessments. <i>Request that this is scoped in.</i>
Additional Comments	Chalk streams are a priority habitat. A chalk stream west of Alford, within the study area, is shown on the Natural England Open Data Geoportal . Further data might be available from the Environment Agency and Natural England.

Report & Section	Scoping Report Volume 3 - Figure 10-1
Issue	The superficial geology map does not match our records, the map identified in Ref 10.27 (main report), BGS GeoIndex (Ref 10.28), or the descriptions in Table 10-6.
Impact	Potential confusion of spatial distribution of superficial geology.
Solution	Update the figure in future reports to match descriptions and other available data or provide a reference and justification for the data presented.
Additional Comments	We generally recommend BGS online geology viewer (Ref 10.28) rather than scanned sheets in the maps portal (Ref 10.27), as the online viewers reflect any changes since the sheets were published (in this case, 1996).

Report & Section	Scoping Report Volume 3 – Figure 10-2
Issue	The bedrock geology does not show band of Carstone Formation (Sandstone) in the west of the site. This is shown in the cross-section on the map noted as Ref 10.27, on the BGS GeoIndex, and is named in the Table 10-6.
Impact	Presence of sandstone may require specific hydrogeological and engineering considerations.
Solution	Ensure the full geological setting is included in future illustrations.
Additional Comments	This figure also does not give distinction between the different named chalk formations present. While this does not materially affect the assessment at this stage, we would typically expect it to be shown for completeness.

Report & Section	Scoping Report Volume 3 – Figure 10-4
Issue	This figure does not appear to show all licenced groundwater abstractions we have in our records.
Impact	Potential risk to private and public potable abstraction boreholes if their locations are not identified and appropriate mitigation put in place.
Solution	We recommend the applicant requests this information and updates the figure accordingly for all subsequent reports and assessments.
Additional Comments	The EA does not have a record of deregulated licences and other private boreholes. We assume the necessary information has been obtained from the local authority, but it is not specified either way in Section 10.4.19. The record of historical mapped BGS water wells does not appear to match the spatial distribution shown on BGS GeoIndex. We have not checked all records on the BGS website to ascertain which are specifically water wells, but we strongly suggest this be reviewed and revised as necessary.

Additional Information:

Scoping Report Volume 1 – Table 10-6
The summary of bedrock for Section 5 does not include Hunstanton Formation (Chalk), which is present underlying part of this area.

It would be beneficial in subsequent reports to include a review of historical borehole records, to provide indicative thicknesses of superficial soils across the study area. This can be supplemented by site-specific data when the proposed intrusive site investigation works are complete.

Scoping Report Volume 1 – Section 10.4.38

The applicant should note that the groundwater in the Chalk aquifer can be artesian or sub-artesian depending on the time of the year. For this reason, future excavation of the overlying deposits or HDD crossing needs to be carefully considered. We would welcome consultation on any hydrogeological risk assessment (HyRA) that is completed in relation to this.

Scoping Report Volume 1 – Table 10-10

We generally agree with the matters scoped in and out, in consideration of groundwater and land contamination matters, albeit taking consideration of our other comments herein.

This agreement is subject to us approving all necessary construction-related controls in the CEMP and the discovery strategy for previously unidentified contamination. Further consultation is expected, albeit this can be outside the PEIR and ES.

The applicant states that operational runoff from impermeable surfaces “would be sustainably attenuated (and if required treated) prior to discharge to the receiving water environment”. We will need to see a detailed drainage strategy with a procedure for managing runoff, especially for any releases to ground and groundwater. Conditions for attenuation and treatment, and the mechanism for this being actioned, should be included.

We agree with proposal for a geo-environmental desk study and subsequent ground investigation (Section 10.7.2-10.7.5) to assess potential contamination aspects. As part of this, we recommend the applicant contacts the local authority to ascertain if there are any contaminated land records.

Environmental permits

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 dewatering 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.

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.

Sustainable drainage systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

Water Quality

We have reviewed the report and would like all the matters below which has an environmental impact on water quality to be scoped in.

Document Reference(s): Volume 1, Chapter 9	
Issue	<u>Foul water strategy</u> No foul water strategy has been provided, therefore the impact from foul water has not been scoped in.
Impact	There is a requirement to ensure that foul water treatment and disposal is adequate to minimise risk to water quality. Any foul waste generated will need to be contained, and then either connected to a sewer, tankered away, or treated and discharged under permit. If not managed correctly it can greatly increase the about of nutrients, and other contamination, in receiving water courses and water bodies.
Solution	We recommend that accidental spillages and leakages of foul water which could potentially enter the water environment be scoped in for further assessment until the foul water disposal strategy during all phases, construction, operation and decommission is clarified.
Additional information: If sewage will be discharged to public sewer, you should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures. If treatment and discharge at the site is required, you should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. We note that Section 4.3.71 suggests that there will be "welfare accommodation" which is assumed to include facilities which may generate foul water, and that Table 29-A-1 in Volume 2, Appendix 29-A suggest that the construction phase will use temporary portable systems but this needs to be included in Chapter 9 and clarification is required for the operation and decommissioning phases.	

Document Reference(s): Volume 1, Chapter 9, Table 9.6	
Issue	<u>Soil stripping and earthworks</u> <i>"Pollution due to soil stripping, earthworks and excavations, and use and refuelling of plant"</i> has been scoped out during construction.
Impact	For impacts to water quality during construction to be scoped out of further assessment, we would expect mitigation measures to prevent pollution to be clearly described and appropriately secured. The current scoping report does not provide us with enough confidence at this stage.

Solution	We recommend that “Pollution due to soil stripping, earthworks and excavations, and use and refuelling of plant” is scoped in for further assessment during construction. We will expect to review sufficient mitigation measures secured in the CEMP and Surface Water Management Plan.
Additional information <i>“Pollution risks (e.g. bentonite breakout” in Table 9-6 and “Disturbance and handling of potentially contaminated soils during earthwork operations including soil stripping” in Table 10-10 have been scoped in for further assessment which we agree with. However, with “Pollution due to soil stripping, earthworks and excavations, and use and refuelling of plant” being scoped out, it is unclear why the proposed mitigation is deemed sufficient for one of these impacts but not the other.</i>	

Document Reference(s): Volume 1, Chapter 9, Table 9.6

Issue	<u>Operational Surface Water Drainage</u> <i>“Pollution due to discharges of operational surface water drainage” has been scoped out during operation and maintenance.</i>
Impact	For impacts to water quality during operation to be scoped out of further assessment, we would expect mitigation measures to prevent pollution to be clearly described and appropriately secured. The current scoping report does not provide us with enough confidence at this stage.
Solution	We recommend that “Pollution due to discharges of operational surface water drainage” is scoped in for further assessment during operation. We will expect to review sufficient mitigation measures secured in the OEMP and Drainage Strategy (which is part of the FRA).

Document Reference(s): Volume 1, Chapter 9, Table 9.6

Issue	<u>Operational physical disturbance and OEMP</u> <i>“Pollution and physical disturbance” has been scoped out during operation and maintenance.</i>
Impact	The substation compounds carry an inherent risk of pollution from routine runoff and from firewater in the event of a fire. We would expect to see mitigation measures to prevent pollution to be clearly described and appropriately secured such that it will prevent, or limit as much as reasonably practicable, impacts to water quality from these activities and events.
Solution	We recommend that “Pollution and physical disturbance” is scoped in for further assessment during operation.

Additional information

We also note that there is no mention of an outline Operational Environment Management Plan (oOEMP). If management during the operational phase is not suitable, and mitigation methods are not maintained then there is a risk that accidental spills or onsite incidents could reduce the water quality of the surrounding environment. Therefore, we recommend there is an environmental management plan for the operation phase.

The management of any impact from fires at the converter stations or substations needs to be managed during the operation phase, and we would also expect an OEMP to contain details of welfare facilities and any pollution mitigation associated with maintenance.

Document Reference(s): Volume 1, Chapter 10, Table 10-10

Issue	<u>Runoff from impermeable surfaces</u> “Operation runoff from impermeable surfaces” is currently scoped out during the construction phase.
Impact	It is unclear how drainage will be managed at the above ground infrastructure elements of this scheme.
Solution	We require confirmation of how drainage will be secured to prevent contamination entering both surface watercourses, and groundwater resources. Therefore, we would prefer to see “Operation runoff from impermeable surfaces” scoped in for further assessment during the construction phase.

Document Reference(s): Volume 1, Chapter 9 and 10

Issue	<u>Decommissioning</u> We note that decommissioning impacts and potential risks during this phase have not been scoped in within Chapter 9 and 10. We expect this to be included in any assessments going forward.
Impact	Decommissioning impacts could be similar to the construction phase due to higher levels of vehicle use and removal of infrastructure, therefore there is an increased risk to deteriorating the water quality.
Solution	We expect the receptors and impact pathways associated with the decommissioning phase to be included in any assessments going forward.

Additional information

Whilst Table 5-1 suggests that there are “*no likely significant effects to the water environment during decommissioning*”, it does suggest that the effects could be similar to those identified during construction. For this reason, we would recommend that the impacts included in Table 9-6 during construction phase be considered for scoping in during the decommissioning phase.

Associated with the lack of consideration of the decommissioning phase, there is no mention of a Decommissioning Environmental Management Plan (DEMP), but we would recommend that this is produced.

Document Reference(s): Volume 1, Chapter 18, Table 18-9

Issue	<u>Offshore spills</u> “Accidental releases or spills of materials or chemicals” is currently scoped out for all phases of the project offshore.
Impact	Accidental releases or spills of construction materials, fuel, oil or chemicals can deteriorate the marine water quality if it reaches the water environment so sufficient mitigation must be in place before this risk is scoped out.
Solution	We recommend that until we have reviewed mitigation strategies, including an Outline Construction Environmental Management Plan and Outline Marine Pollution Contingency Plan, that “Accidental releases or spills of materials or chemicals” is to be scoped in, for at least the construction phase.

Additional information

It should also be noted that whilst some measures are included in section 18.5.4 on the management of drilling fluids, the Offshore CEMP/ Marine Pollution Plan should include provision for a Drilling Fluid Breakout Plan.

Additional Information:

Document Reference(s): Volume 1, Chapter 4, 9 and 18

Issue	<u>Bathing Waters</u> Section 4.3.13 says that “ <i>The beach at the landfall location is designated as a bathing water</i> ”, however it is unnamed. Furthermore, the designated bathing waters do not appear to be mentioned in Chapter 9.
Impact	If these designated bathing waters are not sufficiently acknowledged, then there is a risk that their water quality could be negatively impacted.
Solution	Include further details of the designated bathing waters within relevant Chapters 4, 9 and 18.

Additional information

The intertidal area at the Anderby Creek landfall location is directly within the Moggs Eye designated bathing water, and under 100m from the Anderby designated bathing water. However, these protected areas do not appear to be mentioned in Sections 9.4.12 – 9.4.23.

We accept that they are named briefly in section 18.4.41, however we would expect the assessment to ensure that works associated with both the onshore and offshore elements

do not risk impacting these designated areas. Therefore, for the PEIR and ES stages we would recommend that the bathing waters are included in both Chapter 9 and Chapter 18 for further assessment.

Document Reference(s): Volume 1, Chapter 9, section 9.8.1

Issue	<u>Water quality monitoring</u> Section 9.8.1 says that “<i>no water quality sampling and analysis is proposed as it is considered that sufficient baseline data is available to generally characterise the water quality of surface water receptors</i>”. This is not deemed best practice as we would advise a water quality monitoring plan to be produced.
Impact	If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality during the construction and operation phases.
Solution	A water quality monitoring plan would support sampling prior to, during and post construction to allow confidence in the management measures and to quantify that no deterioration to water quality has occurred.

Additional information

Section 5.8.1 suggests that “*The ES will outline proportionate monitoring methods to be employed to ensure the effectiveness of mitigation*” and we would support further monitoring of water quality to ensure that the management measures included in the CEMP, and a Surface Water Management Plan, are working effectively.

The monitoring plan should reflect locational variation in the site. For example, monitoring upstream and downstream of any proposed water discharges or water crossings. Ideally the monitoring plan will include enough monitoring samples to detect any seasonal variation.

Document Reference(s): Volume 1, Chapter 9, Table 9-1 and Chapter 18, Table 18-1

Issue	<u>Bathing Water Regulations</u> Table 9-1 and Table 18-1 which lists legislation relevant to the Water Environment and to the coastal and marine physical processes assessment, respectively, currently does not include The Bathing Water Regulations 2013.
Impact	The legislation is relevant to be included to ensure that the designated bathing waters are adequately protected.
Solution	Add this legislation for consideration throughout Chapter 9 and Chapter 18 as the Anderby Creek landfall location is adjacent to Moggs Eye designated bathing water, and under 100m from the Anderby designated bathing water.

Document Reference(s): Volume 1, Chapter 9, Table 9-4	
Issue	<u>SuDS Guidance</u> Table 9-4 which lists technical guidance relevant to the Water Environment currently does not include useful documents associated with Sustainable Drainage Schemes (SuDS).
Impact	If guidance documents are not referred to, useful understanding may be missed.
Solution	Refer to CIRIA's The SuDS Manual (C753) and Guidance on the construction of SuDS (C768)
Additional information We note that sections 9.5.3 and 10.5.2 says that <i>"Runoff from working areas will be managed appropriately during construction with respect to both quantity and quality"</i>. It would be best practice to use SuDS to help manage this runoff.	

Document Reference(s): Volume 1, Chapter 9, section 9.5.3	
Issue	<u>CEMP</u> We support the preparation of an outline Construction Environmental Management Plan (oCEMP). The measures so far detailed are good, but there are further relevant measures and management plans we would expect to see within the CEMP.
Impact	If a management plans as part of the CEMP are insufficient there may be inadequate management during the construction phase.
Solution	Provide further details in the oCEMP as per the additional advice below. If a draft document is able to be reviewed before the Environment Statement (ES) stage this would be welcomed.
Additional information The oCEMP should include sufficient measures and could include preparing the following plans: ○ Surface Water Management Plan, to further explain how surface runoff will be managed during construction. We note that it says <i>"Runoff from working areas will be managed appropriately"</i>, we look forward to being able to review further details. ○ Oil, Fuel and Chemical Storage Plan, where <i>"stored responsibly"</i> is more clearly defined with suitable buffer distances from water receptors and bunded/covered containers. ○ A Drilling Fluid Management Plan, also called a Bentonite Breakout Plan*	

- Details of any sediment and erosion controls
- Management on excavated and stockpiled materials
- Concrete management methods, as it is a known source of hazardous substances, particularly during the curing phase.

*We agree that “*Pollution risks (e.g. bentonite breakout)*” in Table 9-6 is already scoped in for further assessment, however a drilling fluid management plan is required to be submitted as part of the CEMP.

Document Reference(s): Volume 1, Chapter 9, section 9.5.6

Additional Comment	<u>Surface Water Drainage</u> Section 9.5.6 suggests that a “<i>strategy for managing surface water drainage</i>” is anticipated however we would advise that a Drainage Strategy is an essential management measure for the operational phase. It is acceptable that this is attached to the Flood Risk Assessment (FRA).

Document Reference(s): Volume 1, Chapter 9, Table 9.6

Additional Comment	<u>Ordinary watercourses</u> We would like to flag that Table 9-6 lists Main Rivers as receptors of “<i>Pollution risks (e.g. bentonite breakout)</i>” but not ordinary watercourses. Main Rivers are not related to pollution risks, and if all watercourses aren’t assessment suitably as receptors they may be vulnerable to pollution. The assessment should investigate the effects on all watercourses, not just main rivers.

Water Resources

Document Reference(s): Chapter 10: Geology and Hydrogeology	
Issue	Consumptive uses of water are described in the scoping report however the sources of supply have not been evaluated in order to meet these demands, predominantly during the construction phase of the project. The scoping report identifies receptors in its evaluation of potential water resources and groundwater impacts which relate to water use. It does not however, include the effect of water company limitations, water availability in the catchment or appraise sources of supply for restrictions or opportunities on the project itself.
Impact	Underestimation of the limitations associated with sources of water supply available to the project can pose obstacles and delays pre commencement. Water company supply is not guaranteed in Anglian Water supply zones where a non-domestic policy may limit potable supply to welfare stations only; tankering water in will add HGVs to local roads and should be accounted for in traffic and air quality chapters if considered; groundwater abstraction from Chalk is closed in this catchment and superficial aquifers follow the same availability status as surface water. Surface water availability status is good in this area but subject to drainage board advice in what is a level dependent environment. This may pose restrictions which prevent access to water in prolonged dry weather and drought, or even at most peak summer months.
Solution	Anglian Water provide a Water resource assessment which we support and recommend that it is used to provide an options appraisal of alternative sources of supply available to the project if supply cannot be obtained from them. This should itemise the consumptive water demands imposed by the project which include but may not be limited to: • Welfare station supply; • Dust suppression • Wheel wash • Drilling fluids for HDD An appraisal of alternative supplies should also note the water availability in the catchment more information about which can be found in the catchments abstraction licensing strategy. We expect this assessment to be completed as part of the pre application stage of planning and could be incorporated into the Water Environment chapter.

Biodiversity

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 177.
6.4.6

<u>Issue</u>	Only desk-based surveys have been carried out to date. It is stated that in 2025 and 2026 surveys will be carried out.
<u>Impact</u>	Site surveys are a vital part of assessment and if they're done at the wrong time, you may not identify impacts on ecology and habitats.
<u>Solution</u>	The EA will need to know when they will be carried out and to what detail.

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 188.

<u>Issue</u>	<i>"If access upgrades are required, temporary bridges will be used in preference to culverts. Where culverts are unavoidable, these will either be arch culverts, leaving the natural bed alone, or they would be installed with the invert set below the natural bed level for a semi-natural bed to establish within the culvert."</i> We agree with this process as culverts are the least favourable option for new crossings. However, there is no mention in the documents about the type of potential culverts
<u>Impact</u>	Culverts and especially pipe culverts have more biodiversity impacts than bridges.
<u>Solution</u>	If culverts are needed, then a box culvert should be used over a pipe culvert.

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 189

<u>Issue</u>	The document talks about non-native plant species but does not mention non-native aquatic species.
<u>Impact</u>	not including them could mean that these are missed in any surveys.
<u>Solution</u>	These need to be surveyed and need to be considered in any biosecurity action plans.

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 269. 9.3	
<u>Issue</u>	You have said that the EA regulates Main Rivers, but The Environment Agency is the regulatory body for Water Framework Directive for all inland watercourses, not just Main River.
<u>Impact</u>	If these are excluded, then you may be in breach of the WFD.
<u>Solution</u>	The impacts on both main rivers and ordinary watercourses need to be looked at in combination and cumulative impacts will have to be assets. The Water Framework Directive also applies to all coastal waters around England for 1 nautical mile from the coast.

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 282. 9.7.7	
<u>Issue</u>	The documents state that surveys will be carried out only on Main Rivers.
<u>Impact</u>	You may miss impacts on some ordinary watercourses that have a high biodiversity value.
<u>Solution</u>	Biodiversity survey should not be limited to just Main Rivers. Assessments need to be made of all watercourses before they are discounted from further assessments.

Eastern Green Link 5 Environmental Impact Assessment Scoping Report (Document Reg. EGL5-NGET-CONS-XX-RP-YL-006, September 2025), Chapters 6 Biodiversity, page 901. 30.3	
<u>Issue</u>	The EA do not appear to be included in the consultation process looking at cumulative impacts.
<u>Impact</u>	You will be excluding a key consultee in the process.
<u>Solution</u>	When looking at cumulative effects the Environment Agency must also be included in consultation as this links to the Water Framework Directive and catchment wide cumulative

	impacts on watercourses and biodiversity which will be impacted by the project.

Biodiversity Net Gain

In section 1.9 you address Biodiversity Net Gain (BNG) as a minimum requirement of 10%. We welcome the 10% BNG but we would encourage the applicant to provide more where possible. Consideration should be given to the watercourses which can enhance the mitigation measures within the WFD and opportunities to deliver BNG.

Fisheries

Document Reference(s): EIA Scoping Report; Chapter 6; Table 6-5	
Issue	The Humber Estuary SAC has not been included.
Impact	Impacts from the scheme on protected fish species may not be considered.
Solution	The Humber Estuary SAC is designated for river lamprey and sea lamprey and should be listed in this table.

Document Reference(s): EIA Scoping Report; Chapter 20; 20.4.18	
Issue	Sea trout (<i>Salmo trutta</i>) not included in the scope.
Impact	Impacts from the scheme on this fish species may not be considered.
Solution	Sea trout are a diadromous species listed as a priority species on S41 of the NERC Act. They are present in a number of watercourses such as the Humber Estuary, River Trent and River Ouse and spend there marine life in coastal regions of the North Sea. They must be included in the scope of the Environmental Impact Assessment (EIA) to ensure impact-pathways are assessed.

Document Reference(s): EIA Scoping Report; Chapter 20; 20.4.20	
Issue	European eel and Atlantic salmon not being noted as present in the Humber Estuary, River Trent and River Ouse.
Impact	Impacts from the scheme on protected fish species may not be considered.
Solution	Both these protected fish species are present in the Humber Estuary and migrate through to the River Trent and Ouse and should be noted in the EIA.

Geomorphology

Most effects on watercourses during construction have been scoped in. A standalone WFD assessment will be undertaken with onshore surface water elements informed by the biodiversity chapter and hydro-morphology and water quality elements. Geomorphology and Coastal Process comments would be generally similar to those supplied for EGL3/4, however it does appear that some of the previous comments have already been taken on board by the EGL 5 team. However, caveats re. timing of construction and timing of beach renourishment works, brought up during EGL3/4 discussions, also need to be taken into account

Document Reference(s): EIA Scoping Report; Chapter 18 Table 18-9: Scoping assessment for potential impacts on coastal and marine physical processes	
Issue	Scoped out during construction - Disturbance of intertidal seabed morphology
Impact	It is intended to utilise HDD to cross from sub-tidal to Landfall, and the depths proposed (25m maximum depth) should avoid/reduce/eliminate direct effects on the intertidal. However, maximum stated depth is not reached instantaneously. It is a gradual process dependent on the curvature of the drill pipes (see Plate 4-2: Indicative Landfall HDD Cross Section). It is not guaranteed that there will not be a “frack-out” of drilling fluids at shallower levels and/or vibrations during drilling that may induce failure of the subsurface. Therefore, subsequent damage to the intertidal zone cannot be ruled out entirely.

Solution	Scope this in for construction purposes - as possible worst case.

Additional Information:

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).
- Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- 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 regarding river crossings can be found in the following document:

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

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.

From: [REDACTED]
To: [Eastern Green Link 5](#)
Subject: Eastern Green Link 5 EIA Scoping Consultation - EN0210010
Date: 29 September 2025 16:28:42
Attachments: [image001.jpg](#)

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

Thank you for consulting the Forestry Commission on this proposal.

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

We can confirm there are no ancient woodlands within the scoping boundary or adjacent to it. There are some small areas of mixed deciduous woodland adjacent and some small areas of grant funded woodland close to the boundary. It is noted that a full survey has not yet been undertaken and there may be some ancient or veteran trees within the site.

Potential impacts and relevant policy

Ancient and Veteran Trees:

Ancient and veteran trees are irreplaceable habitats.

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](#).

For ancient or veteran trees, 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 will be a need to consider both the direct and indirect impacts resulting from construction. We would expect to see a detailed assessment of any impacts to ancient or veteran trees if any are found within the scoping boundary, including details of measures to be taken to reduce or mitigate any effect.

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

Priority Habitat:

It is noted there are some small areas of mixed deciduous woodland adjacent or close to the scoping boundary.

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"

Grant Funded Woodland:

It should be noted that there is a small area of woodland adjacent to the boundary that shows on our map system that they were established or managed with the support of public money in the form of the Farm Woodland Premium Scheme (FWPS). These will need to be assessed to check the status of the grant.

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

Net Deforestation and Tree Planting:

It is expected that there will be 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.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between 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, not solely in specific isolated areas to be used as screening. 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.

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:

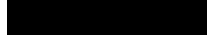
- Robust adherence to the Standing Advice to rule out loss and deterioration of ancient trees and veteran trees as far as possible. For example, this may include the need for a larger buffer area than the 15m buffer which is a minimum required and *might* be sufficient for ruling out impacts to roots in many cases with very small scale developments, but a larger buffer would be recommended. 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, please don't hesitate to contact me.

Best wishes

Sandra


**Local Partnership Advisor
East & East Midlands**

Tel: 
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Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

Date: 22nd September 2025

NSIP.applications@hse.gov.uk

References: CM9 Ref: 4.2.1.7383.
NSIP Ref: EN0210010

<http://www.hse.gov.uk/>

Dear [REDACTED],

PROPOSED - Eastern Green Link 5
PROPOSAL BY- Stephen Mathers (Project Director)INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS
10 and 11

Thank you for your letter of 2nd September 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

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

According to HSE's records, the proposed 'Scoping boundary' for this Nationally Significant Infrastructure Project is within the consultation zones of a major accident hazard site. It is noted that this covers England only and this advice is given only within the onshore 'scoping boundary'. This is based on the shape files [EGL5_PRO_WSP_ScopingBoundaries_Pg_20250805.zip] sent to HSE by the Applicant on 08/09/2025.

The major accident hazard site identified is:

- Flogas Britian Ltd, The Depot, Huttoft Road, Mumby, Skegness, LN13 9JS, HSE Reference: H3711

The Applicant should make contact with the above site operator, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present and the type of development proposed [[HSE: Land use planning - HSE's land use planning methodology](#)]. Based on the information in the document, [Scoping Report Volume 1 Main Text](#), for the aspects currently shown, it is unlikely that HSE would advise against the development. As a result, it is currently unclear where/if people may be present on this part of the development and HSE are not able to comment on its likely Land Use Planning based advice on the aspects of the proposal at this location.

Please note that the advice above is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substance Consent be needed?

Based on the [Scoping Report Volume 1 Main Text](#) document, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances.

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

Consideration of Risk Assessments

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 “working with public bodies in the infrastructure planning process” Annex G on the Planning Inspectorate's website: [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes consideration of risk assessments under the heading “Risk assessments”.

In Chapter 29 Scoped Out Aspects of the [Scoping Report Volume 1 Main Text](#) document, Section 29.4, along with Appendix 29.A in the supporting document, [Scoping Report Volume 2 Appendices](#) provides some possible major accidents and disasters. There appear to be none from nearby major accident hazard sites. It was not clear if there was consideration of risk assessments arising from the development's work activities. We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: *“it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.”*. Note that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority, to also be considered by HSE.

Explosives sites

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

Electrical safety

No comment from a planning perspective

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

Yours faithfully,

CEMHD4 NSIP Consultation Team



Our ref: PL00799782
29 September 2025

Dear

HISTORIC ENGLAND ADVICE

Your Ref: EN0210010

Our Ref: PL00799782

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

Application National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for Eastern Green Link 5 (the Proposed Development) Scoping Consultation

Thank you for contacting us on 2nd September 2025 regarding the PINS Scoping Request for Eastern Green Link (EGL) 5. We have reviewed the documents supplied to us, as referenced below, and have the following comments to make.

- Eastern Green Link 5 Volume 1: Main Text Environmental Impact Assessment Scoping Report (dated September 2025), ref. EGL5-NGET-CONS-XX-RP-YL-006.

We understand the Proposed Development is for an Offshore high voltage direct current (HVDC) cable (c.415km in English Waters) with a landfall at Anderby Creek in Lincolnshire, and an underground HVDC cable c.9km from the proposed landfall to a converter station in East Lindsey. It is proposed to include only one converter station, located either to the north-east of Bilsby or north-west of Hutton, both in East Lindsey, Lincolnshire. With a further c.3km of underground high voltage alternating current (HVAC) to connect the proposed converter station to the proposed Lincolnshire Connection Substation (LCS), which we understand is to be separately consented under the proposed Grimsby to Walpole Project.

Historic England Advice:

Overall, we are generally pleased with the initial scoping assessment and the considerations being highlighted within the report. We have addressed our more detailed comments below in relation to the Onshore and Offshore Project Elements



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respectively.

Onshore Project Elements:

We note the proposed study areas presented within Chapter 7 'Cultural Heritage' are a good starting point for identifying potential impacts to heritage assets. This is demonstrated through the identified heritage assets that could be impacted by the proposed development. The further desk-based assessment and investigation proposed in Section 7.7 'Assessment Methodology' will build on this initial assessment, and we have provided the following comments below to assist with this.

We suggest that Portable Antiquity Scheme data and consideration for Unexploded Ordnance within the onshore corridor are included within the desk-based assessment. We also recommend the use of Ordnance Survey 1-inch mapping because it tends to include wind drainage pumps and duck decoys that have often been lost by late 19th century 1:2500 edition maps.

Paragraph 7.4.25 lists that there are 93 Listed Buildings in Extended Study Area B, of which 5 are Grade I. However, the subsequent list only includes four Grade I buildings. It should be clarified what the 5th Grade I Listed Building is.

We note the proposed converter station siting zone CS05 would impact the setting of Alford Conservation Area. We recommend that any Impact Assessment addresses this, and that any LVIA assesses key views into, and out of, the Conservation Area and impacts on highly graded buildings within it such as, but not limited to, Alford Manor House (NHLE 1063001) and the Church of St Wilfrid, Alford (NHLE 1063026).

Also within Alford Conservation Area is the highly significant Alford Windmill (NHLE 1146936), near its northernmost boundary and in closest proximity to the proposed CS05 zone. A thorough Impact Assessment in relation to this heritage asset would be essential. Any LVIA should include assessment of views from the vicinity of, and out of Alford Windmill, including from upper storey windows and the windmill stage. This assessment should then inform any potential location, design and layout of the development.

The proposed converter station siting zone CS05 also has the potential to impact on Grade II* listed Church of Holy Trinity, Bilsby (NHLE 1360007) to the south. Consideration should also be given to the siting of the converter station and potential screening options to minimise the impacts on the setting of this Listed Building.

The proposed converter station siting zone CS06 has the potential to impact the Grade I listed Church of St Margaret, Huttoft (NHLE 1360009) and its setting. The associated impacts of the proposed development should be assessed and appropriate mitigation designed in to mitigate impact, as required.

Additionally, it is positive to see the inclusion of other Graded Listed Buildings and



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Scheduled Ancient Monuments within the discussion of potential impacts within this chapter.

We understand from paragraphs 7.7.15-16 that a defined list of heritage assets that could be impacted by the proposed works has not yet been produced. As such, the Scoping Report has not set out an assessment of harm for different assets. Given that there is potential for both converter station siting zones to impact highly graded Listed Buildings, careful consideration needs to be undertaken of not only which siting zone would be less impactful, but also where within the selected zone to site the converter station, and what potential screening measures may be required.

Within the Environmental Impact Assessment, where likely impacts to designated heritage assets fall below the threshold for a significant effect in EIA terms, they would still need to be reported alongside the Environmental Impact Assessment through a statement of harm as the Examining Authority will need to weigh all harm to designated heritage assets. As such, we welcome the inclusion of paragraph 7.7.15 which references this.

Additionally, as described in Section 7.8 'Assessment of Cumulative Effects' in paragraphs 7.8.1-2 there are several projects identified within paragraphs 7.4.32-3 as either having overlapping boundaries with EGL 5 or in proximity. The consideration of cumulative effects is therefore crucial. For instance, the cumulative effects from Grimsby to Walpole and EGL 3 and 4 with EGL 5 on the Alford conservation area and the Listed Buildings within.

We were pleased to see the scoping in of construction effects to heritage assets beyond the footprint of the English Onshore Scheme caused by changes to drainage patterns within Table 7-5.

We welcome the commitment to produce a desk-based geoarchaeological assessment and deposit model, as outlined in Section 7.7.3.

Historic England's Aerial Archaeology Mapping Explorer (AAME) is listed as a data resource in section 7.4.8. It is important to recognise the limitations of the AAME data. When using AAME data, consider the following:

- Project Age: Older mapping projects may have reduced spatial precision.
- New Data Sources: Check whether any new aerial or ground-based data has become available since the AAME project concluded.
- Lidar Usage: Confirm whether lidar was used to identify earthworks.

Depending on the limitations of the data set it may be necessary for further aerial assessment to occur.

Offshore Project Elements:



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We understand from the information supplied the project comprises of a high voltage direct current (HVDC) system linking Scotland and Lincolnshire in England. The marine scheme comprises the following elements:

- Approximately 415km of subsea HVDC cable from the MHWS mark at a proposed landfall at Anderby Creek, Lincolnshire, England to where it meets the marine boundary between English and Scottish waters.

From the description of works presented in the report, we can summarise there are potential impacts to archaeological receptors from the proposed cable installation works, and associated seabed preparation, cable protection, and vessel anchoring and jack-ups.

In general, we are pleased with the summary of the baseline environment presented for archaeological receptors and the methodology for assessing potential impacts. We are also pleased to see that all direct and indirect impacts have been scoped into the Environmental Impact Assessment (EIA) for marine archaeology, and the outline mitigation measures proposed in paragraphs 26.8.28-30.

We have several comments to make with regards to specific aspects of the assessment, as set out below.

- Various aspects of the construction, operations and maintenance, and decommissioning phases of the project are set out in the report. The Development Consent Order (DCO) application must be clear which activities associated with these phases are being applied for, and which will require separate applications.
- It is advised that an archaeological desk-based assessment is commissioned from an appropriate and experienced marine archaeological contractor working to recognised professional standards, such as those defined by the Chartered Institute for Archaeologists. This is essential to qualify any material or features of historic environment interest revealed by geophysical or geotechnical surveys and create a comprehensive baseline for these licence areas.
- The EIA should therefore set out further guidance documents it will follow on the assets of survey data, such as the Historic England Deposit Modelling and Archaeology Guidance for Mapping Buried Deposits.
- Furthermore, with regards to the collection of geoarchaeological data, it is important there is a method statement for retention, storage and stage 1 and 2 assessments in place, which contains clear objectives in line with relevant research frameworks.
- The proposed assessment methodology, as presented in Section 26.8, should also consider further guidance relevant to determining the value of maritime, aviation and seabed prehistory. This would be beneficial to the



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assessment of sensitivity.

- We note from paragraphs 28.8.28-30 'Mitigation' that potential impacts to known heritage assets will be mitigated through the application of Archaeological Exclusion Zones (AEZs), Temporary Archaeological Exclusion Zones (TAEZs), and subsequent micro-siting of infrastructure on the seabed, as necessary. Also, we understand that unavoidable impacts to potential receptors will be addressed through agreed mitigation measures, and that these measures will be set out in a project-specific Written Scheme of Investigation (WSI). Based on the information presented, these seem sensible and should be further developed as the desk-based assessment and site specific geophysical and geoarchaeological assessments are completed.
- Additionally, as described in Section 26.9 'Assessment of Cumulative Effects' in paragraphs 26.9.1-3, there are several projects identified within paragraphs 26.5.34 as either having overlapping boundaries with EGL 5 or in proximity. The consideration of cumulative effects is therefore crucial. This is especially important for the projects looking to make landfall at Anderby Creek.
- Further, we request the need for any archaeological reports produced as a part of this development to be recorded via OASIS V (Online Access to the Index of archaeological InvestigationS).

Please copy future correspondence to e-midlands@HistoricEngland.org.uk.

Yours sincerely,

Yours sincerely,

[Redacted]

Inspector of Ancient Monuments

[Redacted]@HistoricEngland.org.uk

cc: [Redacted] (Midlands Team Leader - Historic England)



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From: [Huttoft Parish Council](#)
To: [Eastern Green Link 5](#)
Subject: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification
Date: 27 September 2025 14:12:33

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

Huttoft Parish Council strongly **OPPOSES** National Grid Eastern Green Link 5 project and in particular the potential location of the converter station proposed for Huttoft noted as CS06 in the project plans. Huttoft Parish Council would make the following initial comments on the proposals.

National Grid's plans threaten to industrialise the beautiful rural area of Huttoft and the surrounding areas, as well as across the countryside of Lincolnshire Wolds. The Parish Council remains concerned that the proposed substation and converter stations already disclosed, will act as a 'portal' for the future proliferation of more developments, which the Parish Council believes will mean that the local community could potentially be subject to 20-30 years of construction activity, as well as the decimation of the rural area of Huttoft. Representatives of National Grid have not been able to confirm that there will be no further future developments!!

The impact to the local community will be devastating and the proposals have caused huge concern to the residents of Huttoft and the surrounding area. The loss of prime agricultural land, the damage to tourism and the businesses dependant on local tourism, disruption to the local infrastructure from massive construction vehicles, and impact on the lives of local people would be hugely negative. The disturbance to wildlife in the area would also be negatively impacted by the proposals.

Many residents have moved into the area to enjoy the peace and quiet of the Lincolnshire countryside. National Grid's plans will destroy this enjoyment as well as having a huge negative impact on property prices in the area (this is already happening with properties losing value and remaining unsold for many months).

Part of National Grid's plans include a converter station (CS06) planned to be just a few hundred metres from properties in Huttoft. Residents have raised concerns about the levels of disruption and noise both during the construction phase and once operational, as well as light pollution from huge buildings (over 30 high!) that will be permanently lit up at night.

The proposed converter station (CS06) would also be in very close proximity to a Grade 1 Listed Building in Huttoft.

National Grid quote other "successful and similar" projects such as at Donnington, but these projects were not built in such a quiet rural area or so close of small rural village properties.

The massive size of the proposed converter station (SC06) would have a huge negative impact on the local landscape, and destroy the views from many properties in and around Huttoft.

Huttoft Parish Council has noted the negative impact these proposals have already had on local residents, with many extremely anxious about the plans and very concerned about the impact many years of construction will have on their lives. For many residents, these proposals will directly impact on their health and wellbeing.

On behalf of Huttoft Parish Council

Regards



Clerk & RFO | Huttoft Parish Council

Tel:



[Email: parishclerk@huttoftparishcouncil.gov.uk](mailto:parishclerk@huttoftparishcouncil.gov.uk)

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By email: EasternGreenLink5@planninginspectorate.gov.uk

JNCC Reference: OIA-11041
PINS Reference: EN0210010
Date: 30 September 2025

To whom it may concern,

Eastern Green Link 5, National Grid Electricity Transmission, Environmental Impact Assessment (EIA) Scoping Report (Ref: EN0210010)

Thank you for consulting Joint Nature Conservation Committee (JNCC) on the Eastern Green Link 5 Environmental Impact Assessment (EIA) Scoping Report from National Grid Electricity Transmission (hereafter referred to as the Applicant), which we received on 2 September 2025.

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 have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by Natural England (NE) for aspects relating to territorial waters (within 12nm).

The advice below relates 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:

- Volume 1, Chapter 1: Introduction
- Volume 1, Chapter 3: Consideration of Alternatives
- Volume 1, Chapter 4: The Project
- Volume 1, Chapter 5: EIA Approach and Methodology
- Volume 1, Chapter 18: Coastal and Marine Physical Processes
- Volume 1, Chapter 19: Intertidal and Subtidal Benthic Ecology
- Volume 1, Chapter 20: Fish and Shellfish
- Volume 1, Chapter 21: Intertidal and Offshore Ornithology
- Volume 1, Chapter 22: Marine Mammals and Marine Reptiles
- Volume 1, Chapter 27: English Offshore Scheme Scoping Boundary
- Volume 1, Chapter 29: Scoped Out Aspects

- Volume 1, Chapter 30: Cumulative Effects
- Volume 3, Figures Part 1-6

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

Throughout the EIA Scoping Report, the Applicant has distinguished between inshore and offshore in their supporting Figures which we found very useful. Given the remit of the Statutory Nature Conservation Bodies (SNCBs) is divided based on this factor, JNCC would like to request that all subsequent documents continue to use this delineation to aid in our provision of advice.

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 used only where necessary – with clear signposting – care should also be taken to avoid unnecessary duplication.

We acknowledge 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. We would expect the Applicant to follow this document in all aspects of the assessment regarding pressure-receptor pathways.

Designated Sites

The project Scoping Boundary overlaps with the Holderness Offshore Marine Conservation Zone (MCZ), Southern North Sea Special Area of Conservation (SAC) and the Greater Wash Special Protection Area (SPA). All of these 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 these Marine Protected Areas (MPAs) on the JNCC website available at: <https://jncc.gov.uk/our-work/offshore-mpas/>.

The Holderness Offshore MCZ is designated for the protection of subtidal coarse sediment, subtidal sand, subtidal mixed sediments, ocean quahog (*Arctica islandica*), and North Sea glacial tunnel valleys. The Conservation Objectives for this site are for the features to be **recovered** to favourable condition. With respect to the broadscale habitats, this means that:

- Its extent is stable or increasing; and
- Its structure and function, quality and composition of its characteristic biological communities are such as to ensure it remains in a condition which is healthy and not deteriorating.

With respect to *Arctica islandica*, this means that the quality and quantity of its habitat and composition of its population in terms of number, age and sex ratio are such as to ensure that the population is maintained in numbers which enable it to thrive.

With respect to the North Sea glacial tunnel valleys, this means that:

- Its extent, component elements and integrity are maintained;
- Its structure and functioning are unimpaired; and
- Its surface remains sufficiently unobscured for the purposes of determining whether the conditions in paragraphs (i) and (ii) are satisfied.

The Southern North Sea SAC is designated for the protection of harbour porpoise. The Conservation Objectives for the site are to maintain site integrity by ensuring:

1. Harbour porpoise are a viable component of the site
2. There is no significant disturbance of the species
3. The condition of supporting habitats and processes, and the availability of prey is maintained.

The Greater Wash SPA is designated for the protection of red-throated diver, common scoter, and little gull during the non-breeding season, and for breeding Sandwich tern, common tern and little tern. The Conservation Objectives for the site are to ensure that features remain in or reach favourable condition.

It is a priority under the Marine and Coastal Access Act 2009 to protect the designated features of MCZs, and 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**¹. 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.

Throughout the assessment JNCC strongly advise that the Applicant follow the mitigation hierarchy and avoid routing the cable through designated sites. Sites designated for benthic features with a 'Recover' objective are particularly sensitive to permanent deposits from cable installation, maintenance and decommissioning.

JNCC recommend that the Applicant also consider byelaws and fisheries restrictions in place within MPAs when determining cable protection strategies. Please note, the Marine Management Organisation (MMO) has launched a consultation which proposed new fisheries measures in MPAs, for which Holderness Offshore MCZ is included as part of the stage 3 round of sites². The measures would include the prohibition of bottom towed gear across the whole MCZ thereby minimising the requirement for rock protection within the site. We highlight that it should be a priority to avoid or, if not possible, minimise the introduction of rock protection into Holderness Offshore MCZ as this would permanently change the sediment and prevent recovery and so we would welcome the opportunity to discuss the results of the CBRA when these are available.

¹ [The Environmental Targets \(Marine Protected Areas\) Regulations 2023](#)

² [Consultation on new measures to protect sensitive habitats and species in 30,000 km² of our seas - GOV.UK](#)

The Study Area for the Proposed Development also includes the Scoping Boundary plus an additional 15km either side which further incorporates the North East of Farnes Deep MCZ and Highly Protected Marine Area (HPMA). These sites also have features which are sensitive to many aspects of cable laying operations and therefore, we would like to reiterate our advice above of assessing all potential impact-pathways in combination with the SIC available here: <https://jncc.gov.uk/our-work/north-east-of-farnes-deep-mpa-and-hpma/#conservation-advice>.

The North East of Farnes Deep MCZ is designated for the protection of subtidal coarse sediment, subtidal sand, subtidal mixed sediments, subtidal mud and ocean quahog (*Arctica islandica*). The North East of Farnes Deep HPMA is designated for the protection of the marine ecosystem of the area. The Conservation Objective for the HPMA is to:

- Achieve full natural ecosystem recovery of the structure and functions, features, qualities and composition of characteristic biological communities present within the North East of Farnes Deep Highly Protected Marine Area, to a natural state, and
- Prevent further degradation and damage to the protected feature, subject to natural change.

The conservation advice for North East of Farnes Deep HPMA, which overlaps entirely with the MCZ, supersedes JNCC's previously published conservation advice for the MCZ site.

Chapter 3: Consideration of Alternatives

JNCC note that in Section 3.6.2, the Applicant describes four over-arching guiding principles for the Proposed Development including “*Financially less-expensive options, both in terms of capital and lifetime cost, will generally be given priority...*”. JNCC would like to highlight that the mitigation hierarchy must be followed in relation to environmental assessment. This must include consideration at an early stage of all environmental and consenting costs to ensure all the potential costs for the project are included in relation to consenting risk.

Chapter 4: The Project

We understand that the offshore component of the Proposed Development consists of up to 415km of High Voltage Direct Current (HVDC) cables from landfall at Anderby Creek to the border between English and Scottish adjacent waters. The subsea cable system will consist of two bundled HVDC cables and a fibre optic cable. Associated cable protection such as rock, concrete mattresses and sand, rock or grout bags have also been included within the Proposed Development. JNCC's preferred scenario, as advised above, would be to avoid impact to any designated sites by routing cables outside of the 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 the 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 Stage 2 MCZ assessment will be required and consideration of Measures of Equivalent Environmental Benefit (MEEB).

We note that the Applicant has not included infrastructure crossings in Section 4.4.1 however, has indicated in Table 4-6 that the EIA will identify all crossings and provide indicative crossing dimensions. JNCC advise that the Applicant should select the cable routes which minimise crossings, particularly within designated sites. Holderness Offshore is currently in unfavourable condition for subtidal coarse sediment, subtidal sand, subtidal mixed sediment and ocean quahog. JNCC advise the Applicant to minimise the potential permanent habitat loss or damage within a designated site.

The Applicant has also stated the outlined construction duration window will be over a period of five years between 2030-2035 (Section 4.5). We understand that further information will be provided within the PEIR and ES (Section 4.5.4.) and acknowledge this. We advise that when the PEIR is submitted the Applicant has clearly defined the design parameters, presenting the worse-case scenarios for each phase of the project. The Applicant has stated that government guidance on Rochdale Envelopes will be used to inform the project description within the PEIR for EGL5 and we advise that the applicant explicitly states the maximum design parameters from the out-set. This is a key requirement to enable us to understand how the maximum design scenarios will translate to the worst-case environmental assessment. We highlight this point for the EGL5 project as this was not clearly outlined within the EGL3 and EGL4 PEIR.

The Scoping Boundary is described as being 2km wide, 1km either side of the centre line used for the 2025 geophysical survey with a view to refining this to 500m following review of seabed survey data. Where environmental sensitivities become evident during the survey programme, JNCC recommends consideration is given to retaining a 1km width to allow more options for micro-routing around sensitivities.

Chapter 18: Coastal and Marine Physical Processes

Design and Control Measures

JNCC agree with the approach to bury cables in the seabed, except in areas where trenching is not possible. Section 4.4.25 highlights that a preliminary Cable Burial Risk Assessment (CBRA) will be undertaken based on the results of the geophysical and geotechnical surveys to inform the PIER and ES. JNCC recommend that the potential for repeat passes of trenching and burying equipment be carefully reviewed as part of the 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. We have no further comments on the proposed design and control measures.

Scope of the Assessment

We agree with the impacts that have been scoped in and out of the assessment for marine physical processes.

Chapter 19: Intertidal and Subtidal Benthic Ecology

Baseline Conditions

We note that the Study Area encompasses the English Offshore Scheme Scoping Boundary plus an additional 15km buffer to either side, based on the tidal excursion. JNCC agrees that this is an appropriate approach for benthic subtidal ecology. We defer to NE for comments on the Study Area for the intertidal component.

Data Gathering Methodology

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 Marine Protected Area (MPA) Mapper available at: <https://jncc.gov.uk/mpa-mapper/>.

We note that the Applicant has indicated that sensitivity information based upon the Marine Evidence-Based Sensitivity Assessment (MarESA) framework will be used to understand potential impacts on specific habitats and species (Table 19-4). We also note that the Marine Pressures-Activity Database (PAD) has been referenced in Section 24.6.5 and recommend that this be included in Table 19-4 for clarity.

Table 19-8: Sites designated for benthic habitats and species within the Study Area

JNCC note that North East of Farnes Deep MCZ has been listed in Table 19-8 however, North East of Farnes Deep Highly Protected Marine Area (HPMA) has not been included. Please note that the Conservation Objective for the North East of Farnes Deep HPMA which applies to the whole site is: *'To achieve full natural ecosystem recovery of the structure and functions, features, qualities and composition of characteristic biological communities present within HPMA's and prevent further degradation and damage to the marine ecosystem subject to natural change'*. JNCC therefore, recommend that the site be included in the list of relevant designated sites within the Study Area.

We also note a slight discrepancy in the distance to the English Offshore Scheme Scoping Boundary (km) for the North East of Farnes Deep sites, compared with the distance presented in Table 18-7. The distance presented in Table 18-7 is 12.29km whereas, the distance presented in Table 19-8 is 12km. We recommend the Applicant review these distances to ensure consistency across the application.

Design and Control Measures

Please see comments above regarding Design and Control Measures within Chapter 18.

Scope of Assessment

JNCC defer to our colleagues at NE for comments regarding impacts within territorial waters.

We agree with the subtidal benthic ecology receptors that have been scoped into the assessment however, we note that UXO clearance has not been included within Table 19-9. 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 21: Intertidal and Offshore Ornithology

Baseline Conditions

JNCC note in Section 21.4.3 that a 10km buffer has been applied for red-throated diver and 4km buffer for other diving birds in relation to disturbance from offshore wind turbines. For disturbance associated with vessels, we recommend that a buffer of 2km is applied for red-throated diver and 2.5km for common scoter.

Sections 21.4.6 – 21.4.15 appear to be repeated in the following sections (21.4.16 – 21.4.25), and Tables 21-9 and 21-10 duplicate the content of Tables 21-7 and 21-8. JNCC advise that future documents be streamlined to reduce repetition and minimise the risk of reader fatigue, while ensuring that the chapter remains self-contained and comprehensible as discussed in the General Comments section of this response.

Table 21-11: Designated sites within the Study Area

Please note that common tern has been incorrectly labelled as a non-breeding feature for the Greater Wash SPA.

Table 21-12: Species seasonality for designated sites

Please note that the seasonality for little gull in the Greater Wash SPA is August to May. In Table 21-12, this is presented as July to May. Similarly, the breeding season for little tern should be April to August, rather than April to September as presented in the table.

As per the JNCC website all features of the Greater Wash SPA are Annex 1 features.

Table 21-13: Scoping assessment for impacts on intertidal and offshore ornithology

Within the conservation advice package for Greater Wash SPA, the Advice on Operations states that there is insufficient evidence for the sensitivity of common scoter to suspended sediments. For this reason, an impact pathway may exist and therefore impacts from “*temporary increase and deposition of suspended sediments*” should be scoped in for seaducks and be taken to further assessment.

JNCC welcome the acknowledgement of the need for a vessel disturbance assessment should the timing of the works be unknown at the PIER and ES stages. However, we reiterate that, as a case of best practice, where possible the operations overlapping with the Greater Wash SPA should be scheduled outside of the wintering period (September- April inclusive) and advise that works are in accordance with the best practice advice for red-throated diver.

Chapter 22: Marine Mammals and Marine Reptiles

Relevant Legislation, Planning Policy and Technical Guidance

Please note the JNCC guidelines for minimising the risk of injury to marine mammals from unexploded ordnance (UXO) clearance in the marine environment has recently been updated and can be found here:

<https://data.jncc.gov.uk/data/cbd480f1-47ea-4d78-b94c-04e0f9389daa/jncc-guidelines-unexploded-ordnance.pdf>

Further information on Defra's policy paper on reducing underwater noise in relation to marine mammals can be found here:

<https://www.gov.uk/government/publications/reducing-marine-noise/reducing-marine-noise>

JNCC, Natural England and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland (DAERA) published guidance on noise management within harbour porpoise Special Areas of Conservation (SACs) (2020). As part of this guidance, we recommend the use of Effective Deterrent Ranges (EDRs) be applied to noisy activities to estimate the area from which harbour porpoise may be disturbed or deterred. Please note that EDRs have recently been updated with new advice published (2025).

This advice can be accessed here: <https://hub.jncc.gov.uk/assets/2e60a9a0-4366-4971-9327-2bc409e09784>

We highlight following two key documents:

- Guidance on noise management in harbour porpoise SACs (2020, JNCC Report 654)
- Updated Effective Deterrent Ranges (EDRs) (2025, JNCC Report 803)

Baseline Conditions

JNCC agree with the use of the published Marine Mammal Management Units (MUs) to determine the zone of influence (ZoI) for cetaceans to scope in study area and assess potential impacts on cetacean populations.

Data Gathering Methodology

JNCC are content with the approach stated at this stage and have no comments to make in relation to the data gathering and methodology.

Current Baseline

We agree that all species discussed are as expected for the scope of the project.

Table 22-9: Protected Species

Please note that white-beaked dolphins have been incorrectly labelled as Annex II species in Table 22.9. We assume this is likely an error as bottlenose dolphins have not been listed as Annex II, which appears to be an oversight.

Designated Sites

We agree the scoping boundary of the project crosses the Southern North Sea SAC as outlined in Section 22.4.45 but there appears to be inconsistencies in the distances within the site presented. In Section 22.4.45 it is stated that *"The Scoping Boundary for the Project crosses through the Southern North Sea SAC for 42.9 km."* However, in Section 22.4.46 the Applicant states *"The Scoping Boundary crosses both areas of the harbour porpoises' summer ground for 42.9 km and the winter ground for approximately 4.98 km."* If the scoping boundary crosses the 42.9km of the summer grounds and 4.98km of the winter grounds, the scoping boundary of the project crosses a total of 47.88km of the Southern North Sea SAC. We welcome the distinction between the two different distances affecting each seasonal area.

Design and Control Measures

JNCC agree with the approach to apply for a separate marine licence for UXO clearance if required, as stated in Section 22.5.4. We will welcome the inclusion of the underwater noise assessment for this activity when the required licence is applied for.

Scope of the Assessment

We agree with all the marine mammal receptors that will be scoped into the assessment as outlined in Section 22.6.1. and defer to the relevant inshore agency for matters relating to pinnipeds and marine reptiles.

Table 22.10: Scoping assessment of impacts on marine mammals and marine reptiles

We agree with the impact pathways scoped in and out of the assessment as outlined in Table 22-10 with the exception of;

- 1) Underwater noise changes: Physical presence of Presence of project vessels and equipment. We do not agree with the decision to scope out this impact and recommend that this is assessed within the EIA. The justification provided against this impact within Table 22-10 lacks sufficient evidence to justify this scoping assessment decision. We advise that the physical presence of vessels and equipment will likely disturb sensitive marine mammal receptors animals from the project area with the additional risk of creating a barrier to species movement.
- 2) Collision with project vessels: JNCC advise that this impact is scoped in to the assessment as the Applicant needs to consider the increase in risk from collision with project vessels if there is a significant number of vessels within the project. JNCC advise further justification be provided on how the project will seek to mitigate the risk of collision (e.g. vessel management plans, codes of practice etc). This should be considered throughout the project lifetime including operation and maintenance and not just at the construction phase. We would like to highlight that the risk of fatality is not the only risk to marine mammals if collision occurs with project vessels.
- 3) Electromagnetic changes / Barrier to Species movement: JNCC question whether barrier to species movement and electromagnetic changes should be grouped together. We advise that these are assessed individually as while the presence of cables may not be a barrier to species movement during the operational phase of the project, presence of the project vehicles and equipment could pose a barrier risk during the construction, operational and decommissioning phases. While we agree in principle at this stage with the decision to scope out electromagnetic changes, we advise that this may be subject to change if any new or emerging evidence is published in relation to electromagnetic changes prior to the submission of the PEIR or ES.
- 4) Visual disturbance: We agree with the decision to scope out the effect of visual disturbance on marine mammal receptors Table 22-10 for the project alone assessment provided the physical presence of vessels is scoped in (as outlined in point 1) above). The physical presence of the project vessels and equipment during all phases of the English Offshore Scheme has the potential to disturb marine mammals especially when considered cumulatively with other projects such as EGL3 and EGL4. We would argue that this is a reason for this impact to be assessed as it will need to consider the impact of a further increase in vessel traffic resulting from the project(s). Stating that the region

is already used by large ships and ferries and animals are therefore habituated to the presence of vessels is not a robust enough justification.

Assessment Methodology

In Section 22.7.2. the Applicant states that *“Underwater noise modelling has been undertaken to inform the EIA for the EGL 3 and EGL 4 Projects. The Project has the same cable specification, configuration (bundled) and rating, water depth and length as the EGL 3 Project. The two cable systems run parallel for most of the route in English waters. It is therefore proposed that the underwater noise modelling conducted for EGL 3 would be used to inform the EIA for the Project.”*

While we don't disagree with this approach in principle, we highlight the underwater noise modelling for EGL3 and EGL4 is still under discussion and is waiting to be agreed. The underwater noise assessment presented in EGL3 and EGL4 (OIA-10841, dated 20th June 2025) (Appendix 3.22.A UWN) estimated distances at which marine mammal injury thresholds will be exceeded. The maximum estimated distances at which Permanent Threshold Shift (PTS) may occur for the different noise sources show that injury can be mitigated using standard measures described in the JNCC guidelines (JNCC 2017). However, the assessment has considered the noise levels from geophysical survey equipment against the Southall et al 2019/NMSF 2024 continuous injury threshold. JNCC are waiting to understand why the assessment has not used the expected impulsive thresholds as required. If, following these discussions in relation to the EGL3 and EGL4 project we are not satisfied with the justification with this approach it may be necessary for the assessment to be repeated using the correct thresholds.

JNCC welcome the use of the recorded sightings from the geophysical surveys completed for the Project between April and June 2025 being used to support the baseline description of the PEIR and ES.

JNCC are content with the details provided in relation to the assessment of cumulative impacts and effects at this stage. We have no further comments to make.

Chapter 29: Scoped Out Aspects

JNCC acknowledge that EMFs are only being scoped out for the English Onshore Scheme therefore we have no comments to make on this chapter in relation to marine mammal receptors.

Chapter 30: Cumulative Effects

JNCC are content with the approach regarding the cumulative effects assessment as outlined in Chapter 30 and have no comments to make in relation to environmental receptors within our remit at this stage.

Please contact me with any questions regarding the above comments.

Yours sincerely,

[REDACTED]

Offshore Industries Adviser

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Date: 30 September 2025

Dear Sir/Madam,

Ref: EN0210010

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the Eastern Green Link 5 (the Development)

Thank you for your letter dated 02 September 2025 consulting Lincolnshire County Council (LCC) on the Environmental Impact Assessment Scoping Report produced by National Grid dated September 2025.

LCC have reviewed the information in the Scoping Report and accompanying appendices and have the following comments to make in respect of the English Onshore elements of the scheme and scoping boundary shown on figure 1.2 in the Scoping Report.

EIA Approach and Methodology (Chapter 5)

LCC wishes to raise concern about the temporal scope over which the impacts of the development are proposed to be assessed. It is stated in Chapter 5, paragraph 5.4.10, that the English Onshore Scheme is expected to operate for 40 years; however, it is anticipated that rather than be decommissioned, parts would be replaced to extend the operational life. There is an assumption at paragraph 5.4.11 that the English onshore elements would need to be removed if it cannot be re-purposed and that this process would be similar to the construction but in reverse. However, it is further stated that decommissioning effects are not to be assessed at this stage, and that they would be fully assessed at the time of decommissioning. Paragraph 5.4.14 - 5.4.15 states that there are currently no specific plans

to decommission the project and it is expected that the transmission of electricity would continue decades into the future.

For the ES to be an open and robust assessment of the likely significant effects it should provide an assessment over the anticipated life of the development, as far as reasonably possible, so that the full impact of the development can be understood. LCC are of the opinion that the impacts of the decommissioning phase should therefore be included in the assessment.

The timeframe over which impacts could occur during the operational phase are not clear. Consideration should be given to any likely significant effects that may occur as a result of not decommissioning the site at the 40 year point. Would a longer operational phase (timeframe unknown) and later decommissioning period or the development becoming a permanent feature change any of the assessed effects or introduce any other or different effects not considered?

LCC would wish to see a clearly defined timescale over which the impacts of the development are being assessed, rather than it being open ended.

Biodiversity (Chapter 6)

The biodiversity and ecological elements of the Applicant's Scoping request are broadly divided into offshore and onshore. LCC has focused its resources on reviewing the onshore ecological elements of the scheme and would expect Natural England and / or the Marine Management Organisation to lead on offshore elements.

Part 2, Chapter 6 of the Scoping Report discusses onshore biodiversity. Having reviewed this and other sections of the report relevant to onshore ecology and biodiversity, subject to the comments below, Lincolnshire County Council supports the approach to the assessment of ecological impacts.

Baseline Conditions

Study Area

LCC agrees that the study area and associated Zones of Influence are appropriate.

Current Baseline

No field surveys have been conducted at this stage of the project and information presented in the report results solely from desk-based studies.

A suite of important ecological sites ranging from internationally designated sites to locally important sites have been identified. The Applicant will need to identify potential impact pathways for these sites and their interest features and present an analysis of potential impacts, along with associated avoidance and mitigation measures at PEIR stage.

Desk based studies have also indicated the presence of a range of habitats and species within the study area. Surveys to establish the precise locations of these habitats and presence / absence of species will be required to identify any impacts and to inform mitigation and enhancement opportunities.

6.4.16 states that *“Areas of ancient woodland which are logged on the Ancient Woodland Inventory...have been avoided...”*. LCC welcomes this approach and advises that ancient woodland data for the county has recently been updated by the Greater Lincolnshire Nature Partnership. The Applicant may already have access to this data but should ensure that the most up to date information is being used to assess impacts including from field surveys commissioned in support of the application as set out in 6.4.17.

Scope of the assessment

6.6.1 identifies a range of sensitive ecological receptors that may be impacted by the proposal. LCC broadly agrees with this list, however, 6.6.5 states that Natterjack toad will be scoped out of further assessment as the species is not considered likely to be present in or near the study area. LCC advises that this species was previously confined to coastal sand dune habitats but is now thought to be expanding to more inland areas. LCC recommends that further information on the species' current distribution is obtained from local Natural England and Lincolnshire Wildlife Trust officers who manage the Saltfleetby Theddlethorpe Dunes NNR before scoping the species out of further assessment.

Assessment methodology

LCC agrees with the list of proposed ecological surveys set out in Table 6-10 and notes that surveys will follow best practice guidance unless otherwise agreed with relevant stakeholders.

Given the presence of a suite of ecologically important sites designated for their importance for migratory bird populations in the vicinity of the proposal, the Applicant will need to ensure they have access to sufficient data to determine potential impacts on these populations. Consideration should be given to appropriate timing of surveys during the year to detect areas outside the designated site boundaries used by birds i.e. Functionally Linked Land. Ornithological surveys should also cover more than a single year to help ensure that results are not skewed by any particularly harsh weather patterns.

Assessment of Cumulative Impacts and Effects

The requirement for assessment of cumulative effects is identified at 6.7.13 and is covered in more detail in Chapter 30 of the report. There are a number of development proposals of varying scales in the vicinity of this proposal including other NSIP scale energy infrastructure proposals. The combined implications for habitat loss, land-use change, and associated impacts on species will need careful consideration in the final DCO application.

LCC agrees with the outline methodology for the assessment of cumulative effects as set out in Chapter 30.

Other Biodiversity Assessments

Given the potential for impacts on statutorily designated sites, the Applicant should provide the information reasonably required for a Habitats Regulations Assessment. The Planning Inspectorate will need to undertake a Habitats Regulations Assessment and satisfy itself that sufficient information has been submitted by the Applicant to enable this to be completed.

Biodiversity Net Gain

LCC notes and welcomes commitments made in 1.9.1 to 1.9.4 relating the delivery of “10% Net Gain in Environmental value including as a minimum 10% Biodiversity Net Gain (BNG)...”.

No details of how any gains will be achieved are presented at this stage and the Applicant will need to ensure that habitat surveys are carried out to appropriate standards to allow the population of the Statutory Biodiversity Metric and calculation of the level of gains achieved. The current best practice method for this is set out in the Statutory Biodiversity Metric User Guide. A MoRPH assessment will be required to calculate baseline river units where watercourses (with the exception of ditches) are present in or adjacent to the proposed DCO boundary.

LCC encourages the Applicant to work both with other National Grid projects in Lincolnshire and with other developers and stakeholders in the county to identify opportunities to deliver BNG strategically. This includes by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy.

Commitments to deliver BNG will need to be secured in the DCO and the Applicant will need to demonstrate that the commitments made to delivering BNG are achievable. LCC welcomes the Applicant’s intention at 1.12.7 to establish Technical Working Groups and confirms that LCC’s Infrastructure Ecologist will be happy to engage in this process.

Cultural Heritage (Chapter 7)

Archaeology

LCC are generally supportive of the approach to archaeology outlined in the Scoping Report which acknowledges that the potential effects from permanent loss of archaeological remains are recognised and scoped in (**Table 7-5: Likely significant Cultural Heritage effects**) however LCC would look for a firm commitment to undertake sufficient evaluation to understand the archaeological potential of the English Onshore Scheme and for the results to inform an iterative approach to the design.

Regarding the requirements for archaeological work which will need to be completed before the DCO submission, LCC would expect the desk based evaluation to be complete and the field evaluation to be well underway by the time the PEIR is produced.

The full standard suite of archaeological evaluation will be required. It's vital that a competent full desk based assessment (DBA) be completed at the earliest opportunity as desk based work provides the basis for initial understanding. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme.

Sufficient field evaluation forms an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leave a high degree of risk to the development given the potential for archaeology to have significant impacts on work programmes and budgets.

The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise the impact of the proposal on archaeological remains.

Section 5.3 of the Scoping Report highlights the Rochdale Envelope. Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and appropriate mitigation. This can only be achieved through adequate trenching evaluation of the full impact zone and the timely provision of the results to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy. Ideally this should be in advance of the determination and certainly the results are needed in advance of the work programme commencing in any of the areas not currently adequately evaluated.

This is in accordance with NSIPs Advice Note Nine which states that *'Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties' interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.'* (5.2)

Section 7.3.5 of the Scoping Report states that *'Engagement with key stakeholders will be ongoing up to the submission of the Development Consent Order (DCO) to ensure agreement of the approach to the assessment.'*

LCCs archaeologist has yet to be consulted directly, LCC strongly encourage engagement at the earliest opportunity.

Section 7.7.3 of the Scoping Report states that *'Evaluation may include non-intrusive geophysical survey and intrusive survey through trial trenching, and the programme would be agreed through consultation.'* LCC strongly recommends that evaluation will include the full suite of standard evaluation techniques including geophysical survey and trenching be undertaken and that the results be used to inform the corridor selection process.

LCC notes with interest that this section goes on to state that *'Intrusive survey would be targeted on areas where a review of the desk-based data and geophysical survey have not identified potential archaeological remains, i.e. 'blank' areas. This will be to test if such areas are archaeologically sterile. The results of this may inform the design of the English Onshore Scheme and potentially negate the need for further archaeological monitoring or open area excavation though avoidance of these areas.'*

This is an interesting approach for informing the management of archaeological risk however LCC also recommend that the trenching programme include targeted trenching of the desk based assessment and geophysical survey results. Geophysical survey should be undertaken across the full extent of the onshore order limits.

LCC are also pleased to see the proposal for trenching results to inform an iterative design process, but are concerned by the use of the word 'may' throughout this section, as in *'Evaluation may include non-intrusive geophysical survey and intrusive survey through trial trenching'* and *'The results of this may inform the design.'*

Archaeological evaluation including trenching results would allow us to understand where areas of archaeological sensitivity survive across the Site and should be undertaken early enough for the results to inform the iterative process. This would allow for archaeological mitigation through informed design and is essential for effective risk management, providing an understanding of the extent of archaeological mitigation fieldwork required which can then be accommodated within the work programme.

LCC advise that where geophysical survey is not undertaken a higher percentage of evaluation trenching will be necessary to obtain sufficient baseline evidence to determine archaeological potential and inform the mitigation process to deal with the development's impact within the full impact zone. It is critical that the applicant have the baseline evidence to be able to assess and understand the site-specific impact of the development on the archaeological resource.

Sufficient information on the archaeological potential must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains which must be submitted with the EIA.

This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states *"The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape."* (Regulation 5 (2d))

Built Heritage

The Scoping Report identifies the need for an assessment of cultural heritage receptors within 2 km of the onshore elements, including the converter station, landfall and cable

routes. LCC supports this approach but advises that the study area should remain flexible to ensure that any assets whose significance is derived from a wider setting are properly considered, including potential cumulative effects with other NSIPs and large-scale energy infrastructure. The methodology should be aligned with Historic England guidance with clear distinction between archaeological and above-ground heritage assets and proportionate use of field verification where desktop data is insufficient.

LCC expects the Environmental Statement (ES) to set out a robust assessment of potential direct and indirect effects on the historic environment, including setting, character and cumulative change. Where harm to the significance of heritage assets cannot be avoided, this should be clearly articulated and accompanied by appropriate design or mitigation measures.

Landscape and Visual Amenity (Chapter 8)

This Review has been carried out by AAH Consultants (AAH) on behalf of Lincolnshire County Council (LCC) and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following Eastern Green Link 5 documents:

- Volume 1: Main Text Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006;
- Volume 2: Appendices Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006;
- Volume 3: Figures: Environmental Impact Assessment Scoping Report: Document Reference: EGL5-NGET-CONS-XX-RP-YL-006.

While the focus of this review is on Landscape and Visual matters, other information provided within the Scoping Report, and any associated Appendices, has also been considered, providing background and context to the site. This review covers the elements of the “English Onshore Scheme” only. As the project is at an early stage, the Order Limits have yet to be defined, with the information presented within the applicants Scoping Report based on the Onshore Scoping Boundary. Paragraph 4.3.5 clarifies that to “...*retain flexibility, a Scoping Boundary for the English Onshore Scheme has been defined to represent the maximum extent of development*”. As identified in the Glossary: “*Following the receipt of a Scoping Opinion and further design development, the Project Scoping Boundary will be refined and replaced by the Order Limits.*”. Therefore, due to this iterative process of refinement, there will need to be further consultation with the applicant with regard to agreeing the final content and detail of the landscape and visual elements of the submission.

We expect the production of a Landscape and Visual chapter to be included within the ES, which would be in the form of a Landscape and Visual Impact Assessment (LVIA), which should, along with any supporting information (such as plans, photographs, visualisations or figures), reflect current best practice and guidance from, as a minimum, the following sources:

- 'Guidelines for Landscape and Visual Impact Assessment', (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- 'An Approach to Landscape Character Assessment', Natural England (2014);
- 'Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals', 17th September 2019 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)', 10th January 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 04/20 Infrastructure', April 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations', May 2021 by the Landscape Institute (LI); and
- 'Technical Guidance Note (LITGN) 2024-01 Notes and Clarifications on Guidelines for the Landscape and Visual Impact Assessment Third Addition (GLVIA3)', August 2024 by the Landscape Institute (LI);

Overall, we would expect that the assessment of potential Landscape and Visual effects and evolving proposals relating to the scheme, as a Nationally Significant Infrastructure Project (NSIP), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with LCC and other appropriate stakeholders:

- LVIA Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) or initial Survey should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

The following should be considered in the evolving assessment and layout:

Viewpoints and Photomontages

A list of 29 viewpoints is proposed within Table 8-5: Selected viewpoints and photomontages. Of these viewpoints, several are proposed to be developed as photomontages which will primarily focus on the converter station. No photomontages are proposed to cover the landfall, underground HVDC or HVAC cable corridors, or along the

Alford Bypass Construction Route. This approach is reasonable, and we would anticipate that landscape and visual effects associated with these underground elements would be limited to the construction phase. The initial viewpoint locations appear reasonable and provide for a variety of receptors and views, however until the Order Limits are refined, and additional information is put forward for the cable corridor and Converter Station location, we cannot agree these at this stage.

Therefore, due to the evolving design, the final locations of viewpoints are to be reviewed and subsequently agreed with LCC and other relevant stakeholders. The final viewpoint selection should consider views of taller and more conspicuous elements, once the scheme layout is more developed, as well as consider potential key, or sensitive, viewpoints or visual receptors. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant team in regards to proposed viewpoints.

To gain an understanding of the visibility of the scheme and how the development would appear in the surrounding landscape, Photomontages/AVRs should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with TGN 06/19 Visual Representation of Development Proposals. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type, as well as which viewpoints would be developed as photomontages, is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The overview of the proposed methodology provided at Section 8.7 of the Scoping Report is typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the full methodology is provided to allow further interrogation and comment at the next phases of the project.

Scope of the Study Area

It is acknowledged in paragraphs 8.4.1 to 8.4.4 that an initial study area of 3km from the English Onshore Scheme Scoping Boundary has been allowed for. At this early stage, we recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and there is the potential that visibility beyond these study area extents may ultimately be identified.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

A range of published landscape character assessments have been identified in paragraph 8.4.5, from National Landscape Character Areas to regional and local assessments. Further detail on these character areas is provided in paragraphs 8.4.10 to 8.4.23, and several landscape designations in the study area are listed in paragraph 8.4.8 along with other potential landscape receptors in paragraph 8.4.9. These are subsequently utilised to form an initial list of baseline landscape receptors identified in paragraphs 8.6.6 and 8.6.7, however as the scheme progresses and designs are refined, we recommend these are reviewed. To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and needs to include both relevant published landscape character assessments and the LVIA authors own judgements of the landscape character of the site and study area should this vary from published assessments. This potentially should include a finer grain landscape character assessment that considers individual landscape elements or features that make up the wider character, particularly where permanent areas of above ground infrastructure are proposed such as the converter station siting area, and the proposed landfalls.

Visual

The visual baseline is considered in paragraph 8.4.24, and a range of initial visual receptors are identified within paragraph 8.4.25. The visual receptors are subsequently detailed in paragraphs 8.6.9 (Residential Receptors) and 8.6.10 (Recreational Receptors). However, at this early stage of the project we request these be reviewed, refined and consulted upon further once proposals have been developed: we are not in a position to confirm their inclusion or omission at this stage. No transport receptors have been identified.

We would expect that the visual assessment would clearly identify the visual receptors, which would subsequently be the focus of the visual assessment. The LVIA should not just contain an assessment of any agreed viewpoints, it must focus on receptors. The viewpoints are to illustrate the visual effects, and the visual assessment should clearly reference receptors to representative viewpoints to aid this.

The visual assessment should take account of the 'worst case scenario' in terms of maximum parameters and winter views, including effects at construction, Operational Phase (year 1), Residual Phase with mitigation planting having established (10 to 15 years), and at the Decommissioning Phase.

Table 8-6: Receptors scoped in and out for further assessment identifies Employees and transport users are proposed to be scoped out of the LVIA. We would query this approach, and in particular transport users. We agree these are often of lower susceptibility to change, however can also include passengers in vehicles, cyclists and horse riders, which may have higher levels of susceptibility. We would expect these to be considered in any assessment.

Cumulative Impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular similar energy infrastructure or renewable energy developments, as appropriate in regards to proximity and scale. This should consider both

Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects.

Residential Visual Amenity Assessment

Paragraph 8.6.9 of the Scoping Report identifies key residential receptors. Paragraph 8.8.1, bullet 2, identifies that the *“assessment of views from private properties will be based on representative viewpoints from publicly accessible locations and using professional judgement and is limited to LVIA and does not include Residential Visual Amenity Assessment”*. We disagree that residential visual amenity should be scoped out of the assessment at this stage as it is currently unclear if there are residential properties with receptors likely to experience significant effects to their visual amenity. If there are potential significant effects, due to the scale of some of the above ground elements of the scheme, these may ultimately meet the visual amenity threshold and a Residential Visual Amenity Assessment (RVAA), based on the Landscape Institute TGN 2/19), may be required. The scale of the scheme has the potential to give rise to significant effects to local residents, including effects on residents private visual amenity. The layout should also respond to potential views and proximity to any properties to mitigate any potential adverse effects.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect any landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have a negative effect such as appearing out of character or foreshortening open or panoramic views. A Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

Water Environment (Chapter 9)

LCC in its role as Local Lead Flood Authority (LLFA) has reviewed the Scoping Report and associated figures. Water Environment, Chapter 9 of the Scoping Report sets out the standard methodology for assessment. Table 9.6 identifies elements to be “scoped in” versus “scoped out”, these are agreed by the LLFA with regard to surface water flood risk.

The applicant identifies and acknowledges the requirements for appropriate drainage design within Paragraph 9.5.6 which states *“It is anticipated that a strategy for managing surface water drainage, including key principles and provisions, would be described within the FRA submitted to support the ES.”* LCC agrees with this approach and would expect a flood risk assessment to be submitted as part of the DCO supporting documentation.

As the applicant continues to develop their Flood Risk Assessment and Drainage Strategy, LCC would appreciate continuing engagement to ensure the scope of these technical documents address any concerns of the LLFA.

Agriculture and Soils (Chapter 11)

Provisional ALC mapping for the study area is presented Figure 11.2: Provisional ALC Mapping. The Scoping Boundary is largely comprised of Grade 3 (good or moderate quality agricultural land) with pockets of Grade 2 (good quality agricultural land) within the western extent of the Scoping Boundary.

The loss of best and most versatile (BMV) agricultural land, which is critical to national food security, is a particular concern for Lincolnshire. As a result of the number of large scale energy proposals that are coming forward in the county, many thousands of hectares of BMV could potentially be lost. The ES should clearly identify how much of the land is assessed to be grade 3a and above (BMV land). The Council will wish to see built infrastructure located in areas that are not classified as BMV land.

A detailed ALC survey has not yet been undertaken, as stated within paragraph 11.4.4 *“Field data collection will be undertaken through a soil and ALC survey. The survey outcome will be used to determine the impact on agricultural land and soils as a result of the English Onshore Scheme”* This approach is welcomed and LCC would expect a detailed ALC assessment to be included within the ES.

LCC notes the intention to provide an Outline Soil Management Plan (oSMP) to support the ES, this is welcomed. LCC would expect the final document to be discharged via Requirement. LCC is also pleased to note the inclusion of an Environmental Manager and Environmental Clerk of Works for the duration of the construction works.

A suitable SMP sets out the principles and procedures for general good practice mitigation for soil management during the onshore construction works to minimise the adverse effects on the nature and quality of the soil resource. In populating the document, it will be necessary to identify the individual areas of land and the route for soil stripping, trenching, restoration and similar.

The Cables should be laid to contour with a depth of cover of not less than 1.2 metres from the original surface to the top of the protective tile above the Cables, except where necessary for good engineering reasons and with the agreement of the Landowner and/or occupier.

It does not appear that impacts to agricultural drainage have been assessed within Chapter 11 of the Scoping Report. The impacts of agricultural drainage should be assessed within the

ES, LCC would expect the proposal to be designed to work in harmony existing drainage systems.

The proposed development is likely to have a largely temporary impact on agriculture and soils that will result in the temporary loss of agricultural production in the development area generally and/or the possible more permanent loss of production from mostly very good quality agricultural land.

Traffic and Transport (Chapter 12)

LCC in its role as Highway Authority has reviewed the Scoping Report, Chapter 12. The Chapter is fairly standard for EIA Scope and is not of direct relevance to the Highways Authority. LCC will require a full Transport Assessment (TA) to be included within the application documents to support the ES. The TA should show the impact of the development during the construction phase will not have an unacceptable impact on highway safety or capacity.

It is noted that a construction haul route is proposed around the north of Alford (Alford Bypass Construction Route). This could potentially provide highway benefits in enabling construction traffic to avoid the town of Alford. As with other highway proposals, when details of the proposed layout, junctions and TA for this route is available, LCC will be able to advise on its acceptability with regards to highways safety and capacity

LCC would highlight two points of concern with Chapter 12:

Table 12.10 – Hazardous Loads are proposed to be Scoped out. Whilst this might be acceptable in terms of their “environmental impact”, they will need to be assessed and a full Report on expected AILs and their proposed routes would be required to ensure that the highway network is suitable to accommodate expected AILs.

Para 12.6.8 states “*a Transport Assessment (TA) will not be required as the peak hour traffic flows associated with the operational phase of the English Onshore Scheme are anticipated to be very low and, therefore, the operational phase has been scoped out.*”. This is accepted, however a TA of the construction phase of the project would be required to assess the impacts of construction vehicles and staff workers, compound locations, routings, parking provision etc. This is required to ensure that the impact on the highway network is acceptable during the proposed construction period.

As the applicant develop their TA LCC would be keen to have continuing engagement to ensure that the scope of this technical document address any concerns of the Highways Authority.

Socio-economics, Recreation and Tourism (Chapter 15)

Temporary Workforce

Paragraph 15.3.1. of the Scoping Report is welcome. However, the potential effects of temporary construction workers in the area, specifically the ‘associated impact on settlements and facilities’ (paragraph 15.3.1 of the Scoping Report) is not mentioned elsewhere in the Scoping Report but should be scoped in within the context of NPS EN1 paragraph 5.13.4 and particularly the sixth bullet point below it. Thus, the applicant ignores change to ‘local population dynamics’, ‘demand for services and facilities’, and ‘social cohesion’ (also at paragraph 5.13.4 of EN1) in the potentially sensitive receptors of the rural settlements nearest to the construction work.

Agricultural Land

While the loss of agricultural land and potential losses to agricultural businesses are scoped-in, the impacts on socio-economic factors from that appear to be ignored. The indirect socio-economic impacts such as change in local population, change in demand for facilities and services, and loss of spend in the local economy, should also be considered within this chapter. The removal of land from agriculture would also have an impact on the upstream inputs (supply of seed fertilisers, farm machinery etc) and downstream supply chains. This does not seem to have been addressed.

Employment generation

It is recognised that the study areas include the local and the regional areas. It is expected that the PEIR will include estimations of the likely number and type of jobs created from this project, and what proportion of these could come from the ‘local’ area.

This comprises of vast rural areas and areas of poor connectivity to work. The applicant should consider and evidence the following key points:

- Accessibility of employment sites to rural communities: What mitigation will be put in place for travel in a rural area to these sites? How will employment be made accessible (in terms of travel) for local people to be able to access employment. We would consider mitigating factors to include:
 - Funded travel to work schemes
 - Engagement and partnership with local transport providers
 - Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort).
- An approach that prepares the local labour market for the forthcoming opportunities. This could include:
 - Local provider engagement at an early opportunity.
 - Sector development support, to allow local supply chain to prepare existing workforce, and build and encourage opportunities to grow the workforce.

- Bespoke activity that encourages our evidenced ‘hard to reach’ and opportunity potential workforce (including over 50’s and retired military) to access new skills and jobs.
- Raising aspirations within the local communities: Evidence shows that low aspirations in the communities is a key blocker to accessing employment. Such an intense, high profile project can help raise aspirations in local communities by supporting local incentives and schemes. This will support the project by unblocking barriers to local people accessing employment. This will need to be funded activity by the developer.

Local Energy Infrastructure

Whilst it is recognised that this proposal is part of the National Grid’s Great Grid Upgrade an understanding of the local electricity network is essential to help to understand the energy landscape in local communities impacted by the proposal. Data on NGED’s Network Opportunity map shows that primary substations supplying the area currently have constraints. This means that the communities that will be hosting the proposed infrastructure for the Great Grid Upgrade, could also be experiencing constraints which could be a potential barrier to growth. Consideration should be given to how local people and businesses can benefit from the proposal in terms of a secure and resilient supply of electricity.

Health and Wellbeing (Chapter 16)

The Council note this Chapter is to be based around the published new guidance from the Institute of Environmental Management and Assessment (IEMA) on assessing human health as part of the EIA. Public Health would like to be part of a team looking at human health impacts for both mitigation and positive health and wellbeing opportunities.

The Scoping Report sets out how the various elements of the Great grid upgrade, both onshore and offshore interact in Lincolnshire. Compared with other components of the upgrade, EGL 5 presents fewer concerns, as much of the project involves underground cabling. Nevertheless, it remains essential to consider how all of the Upgrade elements interact, particularly their cumulative effects (such as the build-up of Electromagnetic Fields) when taken together. These impacts are expected to be most pronounced at and around the converter stations.

For local communities, distinguishing between EGL projects, the proposed Grimsby to Walpole overhead lines, and large-scale solar farm developments in their areas will be challenging. Therefore, the effect of cumulative impacts, encompassing not only physical health but also mental health must be carefully assessed.

Chapter 16 is comprehensive and, in the Council’s view, should achieve the matters outlined above. LCC broadly agree with the content of Table 16-6: Health and Wellbeing scoping table. However, we consider that Electromagnetic Fields (EMF) should be Scoped In to achieve what is stated in the “Potential for significant effects”, particularly in relation to mental health impacts associated with the perceived risks of EMFs.

The Council welcomes the commitment to engage with identified consultees in respect of health and wellbeing matters and recommend that the UK Health Security Agency (UKHSA) is added to the list of consultees. We also suggest including the Lincolnshire Rural Support Network (LRSN). The study area at Ward level is also welcomed.

Whilst LCC acknowledge that most impacts will arise during construction, we also believe the Project would offer opportunities to deliver positive outcomes for health and wellbeing. For example, new hedgerow planting and woodland creation could enhance access to nature and green space, with associated benefits for physical and mental wellbeing.

Scoped Out Aspects (Chapter 29)

Minerals and Waste Safeguarding

The Council as Minerals and Waste Planning Authority for Lincolnshire have reviewed the Scoping Report and have the following comments to make.

LCC welcome the references made to the Lincolnshire Minerals and Waste Local Plan (LMWLP), including the emerging revised version, which will need to be taken into account.

The Council also notes that, based on the information set out from section 10.4.15 onwards, the initial mapping appears to be accurate in confirming that the study area does not contain any Mineral Safeguarding Areas (MSA's) or sites defined within the LMWLP. However, this position will need to be kept under review, to reflect any future changes to the project, or revisions to the LMWLP.

Waste Management

LCC welcomes the references made to the LMWLP including the emerging revised version, which will need to be taken into account.

The Council also welcomes the references to the Waste Hierarchy (paragraph 10.5.2), including the reference to waste segregation to “enable effective resource use” (paragraph 28.5.1).

With regard to table 18-7, whilst it is positive that the transport of construction waste materials has been scoped into the GHG assessment, LCC consider the omission of, the management and/or disposal of construction wastes and all elements of waste management from other phases of the project to be premature, further clarification should be given to the reasoning.

LCC note the intention to achieve zero waste to landfill by 2026 (section 29.2.5), but would welcome further clarification on the specific measures proposed to achieve this commitment. Furthermore, the Council welcomes the commitment to prepare a Construction Environmental Management Plan (CEMP) and Site Waste Management Plan (SWMP) (section 29.2.6). However, clarification is sought on:

- Whether any waste is anticipated during operation / maintenance phases, and
- The proposed approach to waste management at the decommissioning stage.

Major Accidents and Disasters

Lincolnshire Fire and Rescue (LFR) have reviewed the Scoping Report. It is noted, as the document outlines that there is currently no published guidance nor national legislation to refer to as best practice guidance.

It is recognised that the proposed converter station would have associated risks, the Scoping Report does not outline any specific response details or plans. LFR would expect plans to be considered and developed as the proposals develop. LFR would expect and encourage the developer to engage with local emergency services to develop response plans.

Cumulative Effects (Chapter 30)

The applicants approach to the assessment of cumulative effects is set out in Chapter 30 of the Scoping Report.

The cumulative assessment should cover both intra project and inter projects effects which in addition to setting out the approach and methodology clearly identifies other relevant projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.

LCC wishes to highlight the potential for significant cumulative effects with other NSIP's. The applicant should take into consideration the geographical scale of the NSIP projects in Lincolnshire in combination and consequently the scale of the study area that will be necessary to identify the full extent of the developments and the potential significant cumulative impacts which could occur over a wide geographical area.

Whilst LCC notes that the EGL5 scheme is a separate project to the other proposed energy schemes in this part of Lincolnshire such as, Grimsby to Walpole, EGL3 & EGL4 also part of the Great Grid Upgrade and Ossian, Outer Dowsing and Theddlethorpe Flexible Generation Project. The Council are very concerned about the cumulative impact of these projects which have the potential to overwhelm the local communities, and significantly adversely impact the environment.

The Council are also very concerned about the potential for significant transport related impacts during the construction phase as a result of multiple NSIP schemes being developed over a similar time period, in an area of Lincolnshire that is rural in nature with limited network capacity.

Should the multiple NSIP schemes proposed within this vicinity occur at the same time, all with similar traffic projections the County could see a considerable uplift of traffic on key existing A roads in the east of the County. This would be a major concern and critical routes such as the A16 through Boston and the A158 through Horncastle could not accommodate such changes.

A further concern is the impact that this project and cumulatively with the other NSIP projects could have on tourism in the area. Greater Lincolnshire has a high-quality and varied visitor economy offer across city, coast and countryside. Up to 50 miles of coastline, an AONB, and hundreds of visitor attractions contribute. The Greater Lincolnshire's Visitor Economy in 2022 was estimated to be worth over £2.49bn per annum and supports approximately 30,000 full time equivalent jobs.

These potential impacts could all be more significant when considered with the cumulative impacts of the many NSIP and major energy TCPA applications in Lincolnshire. The cumulative impacts on socio-economic receptors need to be comprehensively considered, and where necessary supported by strategies and plans, for example accommodation strategies in the case of local accommodation.

LCC will expect full consideration to be given to the cumulative impacts with all other proposals in the PEIR and ES as they are progressed and will welcome the opportunity to input in the 'Short List' of other developments in due course.

Yours faithfully,

[Redacted Signature]

For [Redacted Name]

Head of Planning



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[REDACTED]
Senior Environmental Advisor
Eastern Green Link 5 Case Team
Planning Inspectorate

Our reference: DCO/2024/00006
Your reference: EN0210010

By email only

29 September 2025

Dear [REDACTED]

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2027 (The EIA Regulations) – Regulations 10 and 11

MMO scoping consultation response on the application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for Eastern Green Link 5 (the Proposed Development)

Thank you for your scoping consultation dated 02 September 2025 and for providing the Marine Management Organisation (“MMO”) with the opportunity to share our comments with you on the Eastern Green Link 5 Scoping Report.

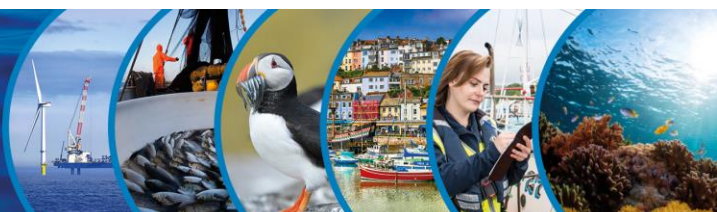
The MMO’s role in Nationally Significant Infrastructure Projects

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 Planning Act 2008 (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

¹ Under Part 4 of the 2009 Act

² Section 149A of the 2008 Act



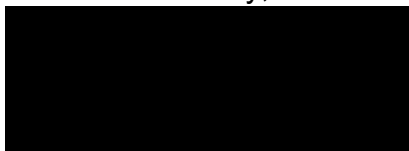
the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works. Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("DML") enable the MMO to fulfil these obligations. Further information on licensable activities can be found on the MMO's [website](#). Further information on the interaction between the Planning Inspectorate and the MMO can be found in our [joint advice note](#).

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) and MMO colleagues based in East, and North East Coastal Offices.

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 

E 

Copied into response:

 (Marine Licensing Case Manager)

 (Senior Marine Licensing Case Manager)





Marine Management Organisation

Scoping Opinion

Marine Works (Environmental Impact Assessment) Regulations 2007 (“the Regulations”)

Title: Eastern Green Link 5 (“EGL5”)

Applicant: National Grid Electricity Transmission plc

MMO Reference: DCO/2024/00005

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1. Proposal

1.1 Project Background

The Eastern Green Link 5 (“EGL 5”) project (the “proposed development”) is a 2-gigawatt (“GW”) High Voltage Direct Current (“HVDC”) electricity link between Scotland and East Lindsey in England. It comprises approximately 600 kilometres (“km”) of subsea and underground HDVC cables between converter stations at each end of the link. Approximately 415 km of the undersea cable will be within English waters.

The proposed development comprises the following offshore components:

- Up to 415 km of subsea HVDC cables from the Anderby Creek Landfall to the border between English and Scottish adjacent waters. The subsea cable system would consist of two bundled HVDC cables and a fibre optic cable (up to the first offshore joint) for control and monitoring purposes.
- Associated cable protection such as rock, concrete mattresses, sand / rock / grout bags.

The MMO has an interest in those aspects of the Proposed Development that may have an impact on the marine area or those who use it, namely the submarine electricity cables from a proposed landfall site to the England/Scotland marine boundary. Therefore, the MMO’s scoping consultation response relates to the elements of the project that fall below Mean High Water Springs (“MHWS”).

2. Location

The Proposed Development is located as displayed in Figure 1 below.

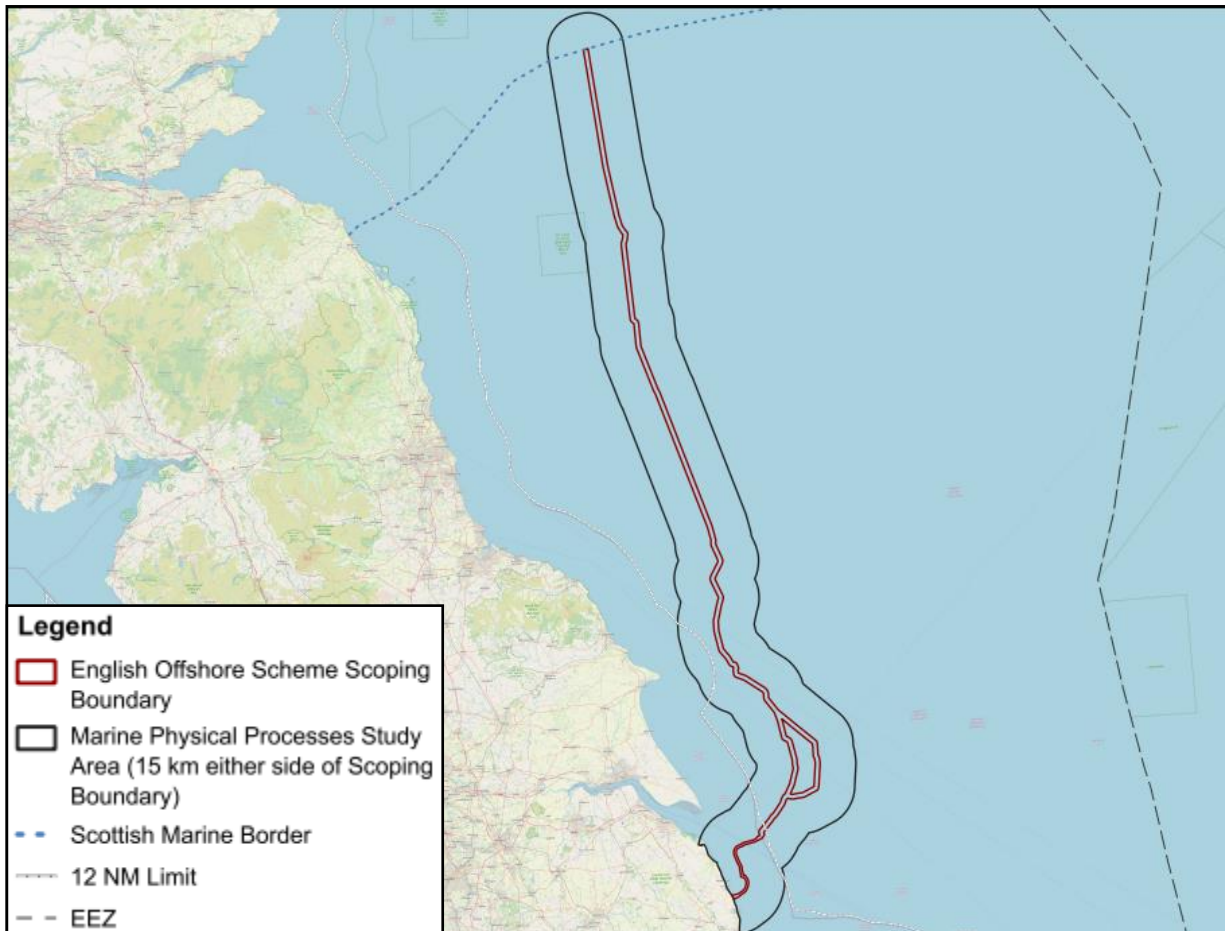


Figure 1: Proposed Development Offshore Scheme Scoping Boundary

3. Scoping Consultation Response

Pursuant of the Regulations, the Applicant has requested a Scoping Opinion from the MMO. In so doing a Scoping Report entitled “Eastern Green Link 5 Environmental Impact Assessment Scoping Report” was submitted to the Planning Inspectorate for review for all stakeholders.

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 Environmental Impact Assessment (“EIA”) and should be included in any resulting Environmental Statement (“ES”).

3.1. Benthic Ecology

- 3.1.1 The MMO considers that the key pressures relevant to benthic ecology receptors have been scoped in. These include Temporary habitat loss/seabed disturbance; Permanent habitat loss from external cable protection; Temporary increase and deposition of suspended sediments; and Introduction/spread of Invasive Non-Native Species ("INNS"). The MMO agrees on the activities identified as sources of these pressures, the phases of the development during which they will occur, and the specific benthic ecology receptors that will potentially be affected. However, the MMO does query the scoping-out of one pressure-receptor combination (see point 3.1.2 below).
- 3.1.2 The MMO notes that "*Temporary increase and deposition of suspended sediments*" for intertidal habitats has been screened out. While the MMO agrees this is reasonable for Horizontal Directional Drilling ("HDD") duct installation (no open-cut works at the foreshore), it should be confirmed, with reference to plume modelling or analogous evidence, whether subtidal activities could generate plumes that reach intertidal habitats under certain tidal or wave conditions. If so, then this pressure-receptor combination should be scoped in for intertidal habitats as well as for the subtidal features that are being taken forward for assessment.
- 3.1.3 The Scoping Report does not detail the sampling effort per habitat or the rationale for differences in the level of replication between stations; however, the stated subtidal sample numbers and spacing appear reasonable. Given that the surveys have already been conducted and the data are likely sufficient, the MMO considers that no action is required in relation to this point, however we raise it for awareness.
- 3.1.4 Several design and control measures relevant to benthic receptors are proposed (Section 19.5 in the Scoping Report), including HDD at landfall, cable burial wherever feasible, the use of cable protection only where necessary, and minimising seabed disturbance by anchors. These measures are appropriate.
- 3.1.5 If sensitive Annex I habitats (e.g., biogenic or geogenic reef) are identified, the MMO notes that the Applicant will determine their extent and consider the need for additional surveys to further classify and avoid them (Section 19.7.10 of the Scoping Report). This approach is appropriate.
- 3.1.6 The Scoping Report does not identify specific cumulative pressures for benthic receptors, which is reasonable at this stage. The MMO notes, however, that the two key pressures that it would typically expect to require consideration within the Preliminary Environmental Information Report ("PEIR") and ES for a development of this type are: 1) 'Temporary increase and deposition of suspended sediments', where seabed-disturbing works from multiple projects overlap in time/space and 2) the 'Introduction / spread of INNS', where hard protection from multiple developments may together act as stepping stones that facilitate their spread. No changes are required in relation to the Scoping Report, but this should be noted for the ES.
- 3.1.7 The MMO notes that the definition of 'impact magnitude' is inconsistent between Chapter 5 (Table 5-3) and Chapter 19 (Table 19-11). Chapter 19 appropriately frames

magnitude in terms of the pressure to which a receptor is exposed (e.g., spatial extent, duration, frequency), but both chapters also define it by referring to changes to baseline features in a way that appears to pertain to the response of the receptor itself (e.g., see section 5.5.5 of the Scoping Report). This risks double-counting and coming to invalid conclusions when determining effect significance based on a combination of impact magnitude and receptor sensitivity. The proposed approach to assessing impact magnitude should therefore be clarified and assurances made that it is defined consistently and independent of receptor sensitivity throughout the Scoping Report.

3.2. Coastal Processes

- 3.2.1 Section 5.2 of the Scoping Report specifies a 'Receptor Based' approach to the EIA i.e., scoping in depends on there being a defined receptor for the impact. Receptor definition for coastal processes are listed in 18.6.1 and include geomorphology, currents and water levels, waves, bathymetry (and seabed features), water quality and sediment quality. There is no indication that these are restricted to designated areas or that effects will only be assessed for ecological receptors so this allows for a wide-ranging assessment.
- 3.2.2 The report proposes to scope out impacts from repair and maintenance of cables due to this affecting a smaller area (i.e., not the whole area affected during construction). However, the magnitude of the impact locally may be important, so the scoping should note any areas with particular sensitivity to disturbance i.e., transport pathways to major seabed features within Marine Conservation Zones ("MCZ"), if any. The MMO also notes that the cable route is not yet determined and may pass through an MCZ, where re-work (potentially repeated) may be of greater significance compared to other sections.
- 3.2.3 Table 18-9 specifically scopes out effects in the intertidal seabed – because the intention is for Horizontal Directional Drilling of the cable beneath this zone to avoid any direct impact. This appears to be reasonable, however the MMO notes that there may be an indirect pathway to impact, depending on the dynamics of the actual landfall location i.e., if the subtidal cable is affecting a process with reach into the intertidal. It is not possible to comment on this at this stage therefore, the MMO advises that the Applicant remains aware that this could be questioned at a later date.
- 3.2.4 The Scoping Report has also scoped out impacts to hydrodynamics due to construction, as these will be assessed for the operational development. As above, this is generally reasonable, however it should be noted that the impact of construction works in the shallower waters should be assessed to ensure that indirect impacts do not reach into the intertidal.
- 3.2.5 The Scoping Report also scoped out accidental chemical releases, contaminated sediment disturbance and temperature increases around the cable. This is reasonable from a coastal process assessment perspective and the justifications given are robust. With particular emphasis on the contaminated sediment, the scoping is based on the data for EGL3 and EGL4 and the fact that EGL5 lies between them. However, it is also noted that EGL3 data is not yet available, and this conclusion

will not hold up if the EGL3 data reveal contamination, or in any location where the parallel routing is not maintained, in which case the scoping evidence may need to be re-assessed.

- 3.2.6 The MMO notes that the assessment will consider *“any residual effects that are reported as non-negligible (or equivalent) within the technical chapters. Minor effects, while not significant, are considered in the assessment on the basis that multiple minor effects may interact to result in a significant effect”*. Exclusion of negligible effects appears reasonable in a physical process context but it might be worth noting that they may have a different significance if assessed as an ensemble e.g., multiple isolated physical disturbances assessed as negligible due to their scale, versus multiple sequential or adjacent disturbances whose combined scale is larger. The Applicant should remain aware of any potential for this to occur.
- 3.2.7 The geomorphology baseline description (paragraphs 18.26- 18.35) provides a good level of detail but none of the named locations or processes are shown on graphics so there is no geographical reference to interpret the information relative to the physical data. For the future assessments and the ES, it would be beneficial for the named locations and processes to be marked on at least one of the accompanying graphics in the relevant chapter.

3.3. Fish Ecology and Commercial Fisheries

- 3.3.1 The Scoping Report has defined a fish and shellfish study area which extends 15 km either side of the English Offshore Scheme Scoping Boundary. The report identifies that the transmission cable overlaps with important spawning areas for Atlantic herring (*Clupea harengus*), whiting (*Merlangius merlangus*), sandeel (*Ammodytes spp.*), plaice (*Pleuronectes platessa*) and other species. Periods of sensitivity for species with spawning and nursery grounds overlapping the project boundary are provided in Table 20-7. Herring and sandeel have been identified as species with a higher sensitivity to disturbance and the report has noted that twaite shad (*Alosa fallax*), allis shad (*A. alosa*), sea lamprey (*Petromyzon marinus*), river lamprey (*Lampetra fluviatilis*), Atlantic salmon (*Salmo salar*), European eel (*Anguilla anguilla*) and Smelt (*Osmerus eperlanus*) may also be present within the project boundary.
- 3.3.2 Temporary increase and deposition of suspended sediments arising from seabed preparation (e.g., boulder clearance, Pre-lay Grapple Run (“PLGR”), HDD duct excavation, cable burial and trenching, anchoring / jack-up foundations, and the deposit of external cable protection has been scoped out for all stages of development for all fish species. It is noted in Table 25-9 that the most significant contributor to the temporary increase and deposition of suspended sediment will come from the sediment plume generated by cable trenching, with the size of the area affected being influenced by the trenching technique employed.

It has not yet been confirmed which trenching technique will be employed, and sediment plume modelling has yet to be carried out for the project; there is therefore some uncertainty over the extent of the sediment plume and the expected concentrations of sediment in the water column that will be generated (in contrast to typical background levels). However, the ES has referenced the EGL 3 and 4

sediment plume modelling which shows that the spatial extent of heavy smothering is extremely localised, restricted to less than a couple of metres either side of the trench and that fine particles will settle within 3.15 km of the disposal location. Impacts from the temporary increase and deposition of suspended sediments arising from cable burial and trenching during the construction and decommissioning stages are scoped in for herring only. This is appropriate given the ES has identified that the cable routes pass through herring spawning grounds and has recognised that herring are sensitive to any seabed disturbance. The sensitivity of herring includes the risk to their eggs and larvae at the spawning grounds which can be smothered from the deposition of fine sediments. Given the sensitivity of herring eggs and larvae, the MMO supports this scoping decision, and is content for this impact to be scoped out for all other fish species.

- 3.3.3 On the whole, the MMO considers that suitable justification has been provided for the scoping out of impacts/ receptors in Table 20-14. Impacts arising from accidental spills of contaminants has been scoped out for all stages of the project in consideration of compliance with marine pollution legislation for all fish species. The MMO has no objection to this approach. Collision risk to basking sharks has also been scoped out of further assessment on the basis that there have only been two sightings of the species within the study area in the last 20 years. The MMO agrees with this decision.
- 3.3.4 The approach to the EIA and data gathering to characterise the environment for fisheries and fish ecology is generally appropriate. It is noted that species-specific assessments for herring and sandeel will be undertaken, with characterisations of their respective habitats undertaken following the methods outlined in Kyle-Henney (2024) for herring and Reach et al. (2024) for sandeel. The MMO considers that this is appropriate. It is also noted that additional grab sample locations will be included in the benthic surveys in areas of potential herring spawning habitat or sandeel habitat. Sediment samples for particle size analysis will be acquired every 2.5 km within these areas. This is welcomed and will assist in improving the spatial coverage of seabed sediment types in terms of their suitability as herring spawning habitat and sandeel habitat.
- 3.3.5 No mitigation for fish has been identified or proposed, which is to be expected at this stage. The need for specific mitigation measures for fish should be determined by appropriate evidence and the outcomes of the EIA.
- 3.3.6 In light of the issues raised concerning potential cumulative impacts to Banks herring spawning habitat in the ongoing consultations for EGLs 1-4, the MMO recommends that the Applicant ensures their list of projects scoped into the cumulative impact assessment includes all projects in the planning, construction and operational stages of development in Central North Sea region, particularly those which occur in the vicinity of, or have elements which interact with, the Flamborough Head herring spawning ground.

3.4. Shellfish

- 3.4.1 The MMO is in generally agreement with the justification for the scoping out of most impacts/ receptors in Table 20-14. However, we would hesitate with the scoping out of Electromagnetic changes as barrier to species movement during operation. Please see comment 3.4.2 below.
- 3.4.2 Whilst Electromagnetic Fields (“EMF”) calculations are noted as ‘not significant’, the expanse of the full North Sea project will be unique in its extent, so the MMO considers EMF should be ‘scoped in’.

Some shellfish species have a migratory or movement phase within their annual or life cycles such as the edible crab (*Cancer Pagurus*) so scoping in some form of shellfish monitoring during the operational phases to verify the assumptions that EMF output would be no barrier to movement for benthic shellfish species. This monitoring in its most simple form could be as an assessment of fishing activity and landings data trends from shellfish fisheries pre, during and post the operational lifetime. Section 29.3.5. notes that *“comprehensive information on EMFs ... will be provided in a separate document... submitted alongside the ES”*.

- 3.4.3 Changes in distribution of target species is ‘scoped out’ in Chapter 24 Commercial Fisheries Table 24-12: Scoping assessment of impacts on commercial fisheries, noting that *“Chapter 20 Fish and Shellfish will assess impacts on fish and shellfish regarding effects from temporary and permanent habitat loss, changes in suspended sediment concentrations, and temperature increase. If impacts on fish and shellfish receptors are significant, this impact will be re-scoped in for commercial fisheries”*. As Chapter 20 Fish and Shellfish does not specifically include the ‘changes to distribution’, the MMO considers that this remains ‘Scoped in’ as per 3.4.2 above to monitor if any changes occur pre and post operation.
- 3.4.4 In Section 20.7 Assessment Methodology Further Data to be gathered/processed paragraph 20.7.5 notes the Outline Fisheries Liaison and Coexistence Plan (“FLCP”) will be produced to *“outline how the Applicant will interact with legitimate sea users prior to and during any works on the English Offshore Scheme. This will be provided at Statutory Consultation with the PEIR and submitted with the application for development consent”*. The MMO is in full agreement of this at as early a phase as possible. Desk-based assessments should always be supported with consultation with the relevant fishers, stakeholders and supporting organisation such as the Inshore Fisheries and Conservation Authority (“IFCA”) and MMO to ensure current relevant and transparency.
- 3.4.5 Paragraph 24.7.3 notes that *“Consultation with local and regional fisheries stakeholders will be conducted to help inform the baseline and obtain data on fishing vessels operating in the area, types and sizes of vessels, fishing gear(s) used, fishing effort, target species, seasonality location of key grounds, etc.”*. The MMO strongly advocates a continued monitoring of fishing landings and consultation with fishers pre and post-operation to support assumptions of limited impact. The Magnitude scoring lists pre- and post-project character changes which can only be proven with monitoring pre- and post-project stages.

- 3.4.6 As noted in comments 3.4.4 and 3.4.5 above, it should be confirmed if the comments raised as part of interaction with fishers and fishery stakeholders, through fisheries liaison or the FLCP, will be recorded throughout the project as a resource of reference to evidence impact, if any.
- 3.4.7 Table 24-7 Shellfish catch seasonality shows a seasonal shellfish calendar from a fish producer data source (Direct Seafoods, 2023) related to catch and landings which will be led by market demand. It should be clearly stated that this is not necessarily related to stock biological or spawning seasonality. For example, scallop (*Pecten maximus*) in the North Sea would have a spawning season from April – September, however it is fished throughout the spawning season ('high season' indicated in the table) as there is a preference for roe-on scallops in the marketplace.
- 3.4.8 Section 20.8 Assessment Limitations and Assumptions 20.8.2 highlights the limitations of species maps for spawning and nursery grounds based largely on data published by Coull et al (1998), and Ellis et al. (2012). It should be clearly stated that these do not adequately cover shellfish species. Only *Nephrops* is included in these publications.
- 3.4.9 No specific mitigation for shellfish and fisheries is proposed at this scoping stage, other than consultation of fishers and consideration of data to identify appropriate mitigation. The need for specific mitigation measures for shellfish should be determined by appropriate evidence and detailed in the EIA and ES.
- 3.4.10 The main references given relating to the location of fish and shellfish spawning and nursery grounds (Coull et al., 1998 and Ellis et al., 2012) are limited for shellfish in that they only mention one shellfish species (*Nephrops Norvegicus*). For this reason, these references do not address spawning and nursery areas for all the other main commercial shellfish species in the assessed area (such as whelk (*Buccinum undatum*), edible crab (*Cancer Pagurus*), scallop (*Pecten maximus*) etc. For these shellfish species, the current observed fishery grounds (indicating adult presence) can be used as a proxy for the spawning and nursery grounds for these shellfish species as they are generally sessile with limited migrations when compared to fish species.
- 3.4.11 Mitigations could include the considerations of sediment curtains and choice of a methodology of least suspension (dependant on seabed substrate and shellfish prevalence indicated by fishing intensity).
- 3.4.12 With respect to National Planning policy relevant to cumulative effects, it notes that "*Applicants are encouraged to work collaboratively with those other developers and sea users on co-existence/co-location opportunities, shared mitigation, compensation and monitoring where appropriate. Where applicable, the creation of statements of common ground between developers is recommended*". In those areas where shellfish are prevalent, fishing intensity is elevated and other cumulative project density is high such as ICES rectangles 37F0, 36F0, then the dialogue to ensure common mitigation and monitoring is promoted and documented between the projects.

- 3.4.13 Table 20-8 shows the 'Top ten most populous species in eDNA water samples (sampled during EGL 4 environmental surveys)'. It should be clearly stated whether the sampling was assessing shellfish as well as piscine species.
- 3.4.14 Table 20—10 'Top five shellfish species caught in 2023 within the Study Area' by landed weight (tonnes) and value (£), values are missing weight and value figures. These should be added to the report.
- 3.4.15 Sections 20.4.30 notes that 'the top five shellfish species by catch value in 2023' were Crabs (C.P Mixed Sexes), Lobster, Nephrops (*Norway Lobster*), Scallops and Cockles. '*A brief description of the most sensitive species ... is presented below*'. Lobster (*Homarus gamarus*) and Scallops are missing from these descriptions in sections 20.4.32 to 36 and should therefore be added to the report.
- 3.4.16 In Section 20.4.39 shellfish i.e. crab and lobsters should be included in the spawning ground sentence.
- 3.4.17 In Section 20.6.1, the statement notes sensitive Shellfish with demersal life stages yet only lists 'cockles'. All shellfish will have demersal life stages and other commercial shellfish would be classed as sensitive i.e. burrowing female crabs. Therefore, this should be amended.
- 3.4.18 Figures 24-2 to 24-6 do not have the Commercial fisheries Study area (15 km either side of the Offshore Scheme Scoping boundary) as included in Figure 24-1. These maps should be updated to include this boundary to visualise interactions with the fishing activities. In addition, fishing will be restricted, and static gear is required to be cleared from the scheme boundary area during construction, and this should be clearly shown with fishing and potting activity maps.
- 3.4.19 The potential for cumulative effects (24.4.50) includes the following projects/developments "*Ossian, Morven, Hornsea 3, Dogger Bank A, B, C, D and South, Outer Dowsing and Sofia offshore windfarms. In addition, other infrastructure such as Viking Link, NU Link, Aminth and Continental Link interconnector projects and Viking National Grid | September 2025 | Eastern Green Link 5 777 and Endurance Carbon Capture and Storage (CCS) pipelines. Of note are the Ossian wind farm export cables and the EGL 3 and EGL 4 transmission reinforcement projects which are planned to make landfall at Anderby Creek, Lincolnshire*". The areas in ICES rectangles 37F0, 36F0 are also intensive for fishery activity and therefore will have increased potential for cumulative impact. A series of low impact activities could have a significant cumulative impact overall which should be noted.

3.5. Dredge and Disposal

- 3.5.1 With regards to dredge and disposal, the MMO considers that the relevant impacts within Table 18-9 of Chapter 18 'Coastal and Marine Physical Processes' have been scoped in. The potential impacts from seabed disturbance, increased suspended sediment concentrations and the release of contaminated sediments has been considered, which is appropriate.

3.5.2 The EGL4 survey and surrounding sediment data has been used to scope out impacts from the release of contaminants on the assumption that the material to be disturbed is likely to be similar in composition and contaminant status to the surrounding sediment. The EGL4 marine survey was undertaken between September 2023 and November 2024 and consisted of eleven sediment samples from across the lower, middle and upper shore zones which were analysed for particle size, heavy metals, hydrocarbons and macrofaunal analysis. Therefore, the MMO does not contest that the material could be similar, and we are content that the data is timely. However, the MMO notes that a marine characterisation survey has commenced within the English Offshore Scheme Scoping Boundary, meaning, to date, geophysical and benthic surveys have been completed (April to June 2025), with further geotechnical surveys scheduled for late 2025/ early 2026. These surveys provide a more detailed site characterisation and fill key data gaps such as positions of seabed features, particular size distributions and levels of sediment contamination. As such, the MMO would expect the results of all EGL5 surveys to be used before the determination of whether this impact should be scoped in or out is made, as opposed to the current approach of using the EGL4 and surrounding data to inform the decision. Moreover, as the report states that the “*Project specific sediment sampling will be undertaken to validate this [levels being low as observed in the EGL 4 and other nearby samples]*” and so the decision to scope the impact out appears premature. It should be clarified why impacts from contaminated sediment have been scoped out prior to the completion of all upcoming surveys in which the data can then be thoroughly reviewed.

3.6. Underwater Noise

3.6.1 Due to resource limitations, the MMO is unable to provide comments regarding underwater noise at this stage. However, we will provide comments regarding this topic in due course.

3.7. Marine Archaeology / Cultural Heritage

3.7.1 The MMO defers to Historic England on the suitability of the scope of the assessment with regards to archaeology and cultural heritage impacts.

3.8. Nature Conservation

3.8.1 The MMO defers to Natural England as the Statutory Nature Conservation Body (“SNCB”) on the suitability of the scope of the assessment with regards to Marine Protected Areas (“MPAs”).

3.9. Navigation/ Other Users of the Sea

3.9.1. The MMO defers to the Maritime and Coastguard Agency and Trinity House on the suitability of the scope of the assessment with regards to navigation of vessels and the safety of other users of the sea.

3.10. Water Quality

3.10.1. The MMO defers to the Environment Agency on the suitability of the scope of the assessment with regards to water quality.

4. Conclusion

The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments documented in the ES in support of the 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.

[Redacted]

Marine Case Officer

[Redacted]

29 September 2025

5. References

[REDACTED] (2024)
Identifying and Mapping Atlantic Herring Potential Spawning Habitat: An Updated Method Statement. A report for the marine aggregates industry.

[REDACTED] (2024)
Identifying and Mapping Sandeel Potential Supporting Habitat: An Updated Method Statement. A report for the marine aggregates industry.



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency

Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your Ref: EN0210010

30 September 2025

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

Via email: EasternGreenLink5@planninginspectorate.gov.uk

Dear Planning Inspectorate,

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

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the Eastern Green Link 5 (the Proposed Development).

Scoping opinion as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

Thank you for your letter dated 2nd September 2025 inviting the Maritime and Coastguard Agency (MCA) to comment on the scoping report for the Eastern Green Link (EGL) 5 project between Scotland (landfall to be confirmed) and Anderby Creek in Lincolnshire, England. We note that this scoping report is written with regards to the English Onshore and Offshore Schemes and that the Scottish section of the cable will be consented separately as SSEN Transmission is responsible for the Scottish components of EGL5.

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 scoping report for the offshore scheme for EGL5 has been considered by representatives of UK Technical Services Navigation at the MCA and we would like to comment as follows:

We note the English offshore scheme for EGL 5 comprises a 2GW HVDC system composed of up to 415 km of subsea HVDC cable linking the Scottish coastline and Lincolnshire in England; the English Offshore

Scheme Scoping Boundary encompasses two route options, Option 1 - ENG Route A and Option 2 – ENG Route B. The subsea cable system would consist of two HVDC cables and a fibre optic cable.

The development area carries a significant amount of through traffic to major ports with a number of important international shipping routes in close proximity, and a significant amount of other marine users e.g. offshore windfarms, dredging sites, ports, and crossing wind farm and interconnector cables. Attention needs to be paid to any changes created to vessel routing, particularly heavy weather routing to ensure shipping can continue to make safe passage without large-scale deviations, and any reduction in navigable depth referenced to chart datum.

We note in Section 3.7.5 in the Scoping Report Volume 1 Main Text, that the marine route was planned with the aim to avoid areas which would restrict vessel movement, anchorages, offshore wind farms, oil and gas infrastructure, aggregate extraction areas and crossings of cables and pipelines, which we welcome. The result has been a selection of a route to the East of the EGL3 cable route although two routes, A and B, will be consulted on. Installation of the HVDC cables at the landfall between Onshore and Offshore environments would be achieved utilising trenchless methods where possible to minimise disruption and avoid direct impacts to the intertidal zone.

We note that a scoping boundary for the English Offshore Scheme, which runs parallel to the EGL3 and EGL 4 projects from landfall, has been defined to represent the maximum extent of development in order to allow for subsea cable route development whilst the ongoing geophysical, geotechnical and seabed surveys take place. The results of geophysical and geotechnical surveys will inform a preliminary Cable Burial Risk Assessment (CBRA), which we welcome. All potential construction methodologies would be assessed to identify if any should be excluded due to the potential for significant impacts, and whether mitigation is required. The scoping report also mentions the potential use of guard vessels to warn mariners of any lengths of unprotected cable during cable lay.

We note the commitment in Chapter 23 Shipping and Navigation to complete a Navigation Risk Assessment (NRA), including a baseline study which will summarise the available background navigation data and focus on any key shipping routes and/or anchorage/disposal areas and fishing activity in the vicinity of the Project. With supporting marine traffic surveys, the NRA will establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP).

The MCA welcomes the commitment in Section 23.3.3 to undertake a Marine Hazard Identification workshop which we recommend should include local ports, harbours, wind farm developers, fishing federations amongst other stakeholders. We would like to request that the NRA includes navigational charts for context and accurate assessment of navigational features and for the charts to include designated and non-designated anchorages. As per 23.7.3 a detailed Marine Traffic Study will be undertaken, which will involve AIS data for a year. We also note that VMS data and local stakeholder consultations will be a part of the assessment.

A range of potential project impacts on shipping and navigation and other marine users have been identified which could occur during the construction, operation, and decommissioning phases of the project. We note the assessment will follow the International Maritime Organization (IMO) Formal Safety Assessment (FSA) methodology, which we welcome. This is the internationally recognised approach for assessing the impact to shipping and navigation users. The MCA would expect the EIA report to detail the possible impact on navigational issues for both commercial, fishing and recreational craft, specifically:

- Collision Risk
- Navigational Safety
- Visual intrusion and noise
- Risk Management and Emergency response

- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions
- The likely squeeze of small craft into the routes of larger commercial vessels
- Deviation from established vessel routes and areas

As listed in Table 23-7, we are content that the applicant has listed the above potential impacts to be included in the EIA.

Under Keel Clearance

We note the potential for a reduction of under keel clearance, which will be scoped into the assessment. Safe realistic under keel clearance (UKC) assessment should be undertaken for the maximum drafts of vessel both observed and anticipated in accordance with the industry standards and common practices. We expect a detailed UKC assessment within the NRA, particularly in areas below 20m water depth, where any cable protection/ crossings are expected. The assessment should be based on the maximum and average draught of the vessels operating in the vicinity and should also account for variable factors like theoretical squat, external effects like heel, CATZOC etc.

Cable Burial Assessment

Attention should be paid to cabling routes and burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. Section 4.4.25 of the Scoping Report states that the applicant will undertake a pre-construction CBRA and Burial Assessment Study and indicates that burial depth will typically be 0.6-2.5 m below chart datum. The final target burial depth will be determined by the CBRA which will take into consideration location specific factors such as ground conditions (i.e., ability to bury), intensity of shipping and fishing activity. The results of the CBRA and Burial Assessment Study will be used to identify which cable burial tools may be selected and inform the ES and NRA and which we welcome.

Navigable Depth and Protective Measures

While a 5% reduction in navigable depth referenced to chart datum is the formal trigger for further discussion, any depth reduction in areas where deep-draught vessels operate or areas of highly mobile seabed must be reviewed. Any reduction must not pose a danger or hazard to navigation. 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.

If cable protection measures are required e.g. rock bags or concrete mattresses, potential reduction in navigable depth will be particularly relevant where depths are decreasing towards shore, at cable crossings and in particular any depth reduction below the 20-metre contour. We note in the report that as the design progresses, further assessments will be undertaken in order to assess the subsea cables protection against shipping and fishing activities including consideration given to a design of rock protection that minimise the risk of fishing gear snagging.

We note that whilst avoiding the River Humber Approaches Traffic Separation Scheme (TSS) the project would potentially require a cable crossing of the Hornsea Project 4 wind farm export cables (amongst other wind farm cable crossings detailed in Table 25-14) within an area of relatively shallow water. As stated in Section 24.4.50 the Ossian wind farm export cables and the EGL 3 and EGL 4 transmission reinforcement projects which are planned to make landfall at Anderby Creek, Lincolnshire will need to be considered in the assessment for the cable route. We are content that the OWF owners will be consulted on the project with regard to cable crossings as noted in section 26.5 of the Other Marine Users chapter.

Electromagnetic Deviation

As stated in Table 23-5, we are content that a desktop study will be undertaken to establish the electromagnetic deviation affecting ship compasses and other navigating systems, of the high voltage cable route particularly for landfall sites. This will be presented with the PEIR and ES. The MCA would be willing to accept a three-degree deviation for 95% of the cable route and for the remaining 5% of the cable route there must be no more than a 5 degree electromagnetic compass deviation. On receipt of the study, the MCA reserves the right to request a deviation survey of the cable route post installation. The applicant should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts. We note this has been scoped in for the operational phase of the project, which we welcome.

Hydrographic Surveys

The MCA would welcome any survey data being submitted as third-party data to the UK Hydrographic Office (UKHO) for the update of nautical charts and publications to improve safety. Further information can be found in MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations are provided.

The MCA welcomes that all aspects related to shipping and navigation have been scoped into the assessment, and only the interference with marine navigation equipment is proposed to be scoped out for the construction and decommissioning stages.

The MCA is satisfied with the scoping report at this stage as the basis for the ES and the proposals for the NRA from the shipping and navigation perspective.

I hope you find this information useful at Scoping Stage.

Yours faithfully,


Marine Licensing Lead
UK Technical Services Navigation



The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: [REDACTED] – **Senior Environmental Advisor**
Planning Inspectorate

[By email: EasternGreenLink5@planninginspectorate.gov.uk]

Our ref: ENSIP-21

19th September 2025

Dear [REDACTED]

Re: Eastern Green Link 5

Thank you for your notification of the 2nd September 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

The Coal Authority are a statutory consultee under Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, where projects fall within areas of past, present or future coal mining.

The Planning team at the Coal Authority have reviewed the coal mining data we hold against the areas proposed for the Eastern Green Link 5 project.

I can confirm that based on the area identified for the project it does not lie in the Development High Risk Area. These are areas where our records indicate that coal mining features at surface or shallow depth are present and these may pose a risk to surface stability and public safety.

The records we hold does however indicate that a small part of the link does lie within the Development Low Risk Area. The remainder of the site falls outside of the coalfield. In the Low Risk area we draw developer's attention to the following Standing Advice note:

The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Mining Remediation Authority on 0345 762 6846 or if a hazard is encountered on site call the emergency line 0800 288 4242.

Further information is also available on the Mining Remediation Authority website at: <https://www.gov.uk/government/organisations/mining-remediation-authority>

On the basis that the site does not fall within the defined Development High Risk Area the Planning team at the Coal Authority have no specific comments to make on this project.

If you would like to discuss this matter further please do not hesitate to contact me.

Yours sincerely

 BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI

Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority or information that has been published for consultation purposes in relation to this specific project. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the applicant/developer for consultation purposes.



Defence Infrastructure Organisation

Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

29 September 2025

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

By email only

Your reference: EN0210010
Our reference: DIO 10067708

Dear Sir/Madam,

Eastern Green Link 5 (EGL5) Scoping Consultation

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.

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, technical sites, training resources such as the Military Low Flying System or maritime defence assets and interests.

The MOD previously provided comments in our letter dated 20th June 2025, in response to the Eastern Green Link 5, Stage 1 Public Consultation. The applicant, National Grid Energy Transmission plc (NGET), is now seeking a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, to inform the completion of an Environmental Statement for the proposed development.

The EGL 5 project proposals comprise an offshore cable corridor for the installation of high voltage direct current (HVDC) cables up to 415km in English waters extending from the northern limits of English waters in the North Sea to the proposed landfall on the Lincolnshire coast at Anderby Creek. Where the English Offshore Scheme makes landfall the HVDC cables will be conveyed via a transition joint bay to the shore and will be continued underground for approximately 9km to a new converter station and two new Lincolnshire Connection Substations (LCS) which are

proposed in the Alford area (LCS-A northwest of Alford and LCS-B northeast of Bilsby) and are part of the NGET Grimsby to Walpole Project.

Offshore Development

The applicant has recognised the relevance of MOD Practise and Exercise Areas (PEXA) and identified 14 MOD Danger Areas that occupy the study area (ref. Table 25-11) for the proposed development. Within the EGL5 Scoping Report, Volume 1, Main text document (Table 25-5: Non-Statutory Consultation Responses), MOD concerns with the proposals relating to designated MOD Danger Areas submitted within our letter dated 20th June 2025, have been noted by the applicant and will be considered within the Environmental Impact Assessment.

However, at section 25.4.11 – 25.4.15 “MOD Activities” the applicant has recognised that live firing may be conducted in Danger Areas, but does not appear to have recognised that this is only relevant to those Danger Areas that extend down to the surface as has been previously identified in the DIO Safeguarding pre-application response.

At section 25.4.12, the applicant has interpreted that surface danger areas are used by the MOD for land based firing practise, firing of artillery and other projectiles and that these danger areas typically form a small ‘cone’ with the base of the cone out at sea. This interpretation is incorrect in relation to the Danger Areas occupying the study area that extend down to the surface. These Danger Areas support air to surface firing activities. The altitude that military utilising those Danger Areas that extend down to the surface varies, but is not confined to being above 5000 feet as has been concluded by the applicant at section 25.4.14.

Subsequently, in Table 25-15, the applicant has determined that “interaction with aircraft using PEXA should be scoped out with respect to the offshore element of the development proposed. This is on the basis that vessels and marine construction equipment deployed to undertake the development will not provide a pathway for interaction with low flying military aircraft”. It is possible that vessels and marine construction equipment that may be deployed within the Danger Areas that extend to the surface may affect air to surface military training activities involving military aircraft and displace military training activities. As such this potential impact does need to be scoped in and taken into account.

The applicant has also not recognised the potential need to consider the effects of projectiles or other items that may be dropped into the marine environment within the Danger Areas that extend to the surface possibly affecting the structural integrity of sub-sea installations forming part of the proposed development. It is recommended that the applicant should take this into consideration in finalising their plans for this development proposal.

It is noted that the applicant has recognised that unexploded ordnance (UXO) may be present in the locality of the proposed offshore study area. Measures to identify and address that which may be present prior to the commencement of construction activities are identified (ref. Table 4-6: Pre construction activities).

The applicant has recognised that maritime defence interests that are not defined in the public domain may be of relevance to the preparation of this development proposal and will engage with the MOD to take these into account as may be necessary.

Onshore Development

The extent of the area currently identified for the possible installation of onshore infrastructure featured in the proposed development is situated outside of any MOD statutory safeguarding zones protecting operational defence sites. The onshore development proposals will be located

within Low Flying Area 11 (LFA 11) in which fixed military aircraft engaged in low flying training may fly as low as 250 feet (76.2m) above terrain features.

The EGL5 Scoping Report, Volume 1, Main text document identifies that the onshore cable routes featured in this development will all be subterranean. Therefore, this aspect of the proposed scheme will not have implications to military low flying training activities. It is noted that the proposed converter stations are expected to be approximately 30m in height. These will also not affect military low flying training activities. However, it is possible that cranes and temporal structures erected during their construction may introduce temporal obstruction hazards to military low flying training and it would be appropriate for this to be taken into account in the preparation of the proposed development.

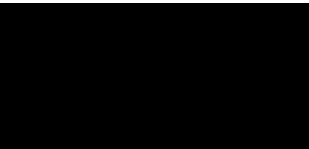
At this scoping application stage, where finalised details for the design and location of the proposed development are not available; MOD representations are limited.

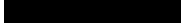
In summary the MOD has concerns and should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the documents published on the Planning Inspectorate website, in support of this proposal, as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. 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 faithfully,

A large black rectangular redaction box covering the signature of the Safeguarding Manager.


Safeguarding Manager
DIO safeguarding

From: [NATS Safeguarding](#)
To: [Eastern Green Link 5](#)
Subject: RE: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification [SG39397]
Date: 02 September 2025 15:46:05
Attachments: [~WRD0004.jpg](#)
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[image015.png](#)
[image016.png](#)

Our Ref: SG39397

Dear Sir/Madam

NATS anticipates no impact on its infrastructure and operations from the proposal. Accordingly it has no comments to make on the Scoping Opinion

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk



NATS Internal

From: Eastern Green Link 5

Sent: 02 September 2025 14:58

Subject: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/ Madam

Please see attached correspondence on the proposed Eastern Green Link 5 project.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a 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 its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **Tuesday 30 September 2025**.

The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards



Senior Environmental Advisor



Planning Inspectorate

T [REDACTED]



@PINSgov



Planning Inspectorate



planninginspectorate.gov.uk

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Our ref: NH/25/12750
Your ref: EN0210010

Eastern Green Link 5

██████████
Assistant Spatial Planner
Three Snowhill
Snow Hill Queensway
Birmingham
B4 6GA

Tel: ██████████

Friday 26 September 2025

Via email: EasternGreenLink5@planninginspectorate.gov.uk

Dear ██████████

Consultation on EIA Scoping Report for the development of Eastern Green Link 5 – a primarily offshore high voltage electricity link, with associated onshore infrastructure between Scotland and England.

Thank you for inviting National Highways to review and provide comments on the Environmental Impact Assessment (EIA) Scoping Report for the referenced proposal.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

As a part of this application, our principal interest is in the operation of the A46 around Lincoln, which forms part of the SRN, located approximately 50 kilometres from the English Onshore Scheme Scoping Boundary at Alford, Lincolnshire.

National Highways has outlined below both the general and specific matters that we would wish to see considered as part of the EIA.

General aspects to be considered in all cases include:

- We acknowledge that a Transport Technical Note (TTN) and a Construction Traffic Management Plan (CTMP) will be prepared in support of the forthcoming planning application, and we look forward to receiving these documents for review.
- An assessment of transport-related impacts of the proposal should be carried out and reported as described in the Department for Transport's 'Guidance on Transport Assessment (GTA)' and DfT Circular 01/2022. Although the GTA guidance has been archived, it still provides a good practice guide in preparing a TA. In addition, the Department for Levelling Up, Housing, Communities and Local Government also provides guidance on preparing TAs.
- The environmental impact arising from any disruption during construction, traffic volume, composition, or routing change and transport infrastructure modification should be fully assessed and reported.
- Adverse changes to noise and air quality should be considered, in relation to compliance with the Air Quality Standard Regulations, EU Exit regulations, and/or in local authority-designated Air Quality Management Areas (AQMAs).

Site-specific considerations

Following a review of the EIA Scoping Report, we have set out our site-specific comments below.

Chapter 4 - programme timescales

Construction programme timescales

- It is anticipated that the proposal will gain development consent in 2028, with enabling works starting in 2030. The main construction stage will take place between 2030 and 2035 and up to last five years. The earliest operational date is expected to be 2035.

Decommissioning

- The English Onshore Scheme has a minimum design life span and is licensed for 40 years, following this, the proposal will be subject to maintenance. We understand that there are no current plans to decommission this proposal.
- Decommissioning works are expected to be similar or less than those of the construction phase in magnitude and duration.

Chapter 12 - traffic and transport

Legislation and planning policy

- We welcome the inclusion of the National Planning Policy Framework (NPPF) and the Department for Transport (DfT) Circular 01/2022 in the Traffic and Transport section of EIA Scoping Report.
- The requirement to include a Travel Plan with details of proposed measures to encourage sustainable modes of transport is welcome.
- The IEMA Guidelines for the Environmental Assessment of Traffic and Movement will be used to examine the environmental impacts of the development in terms of traffic and movement.

Study area

- The proposal is located at a considerable distance from the SRN. While the SRN may not fall within the defined traffic and transport study area, we are interested in understanding the impacts of this proposal, in particular during the construction phase, on the SRN.
- Figure 12-1 outlines the corridors considered as part of the traffic and transport study area. As per the above point, we recommend that an analysis of the construction impacts on the SRN is presented as part of the CTMP, considering the routing of staff, Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AIL).

Future baseline

- The assessment of traffic will be undertaken at the construction phase, year of opening of the English Onshore Scheme and /or the first full year of operation. We also acknowledge that the phasing of the construction of the English Onshore Scheme will be considered. Please note, that the peak construction year should be clearly identified within the TTN and CTMP.
- We welcome the proposed approach to the future baseline, which will include TEMPro-derived traffic growth rates from new development in the area, committed developments, and changes to transport infrastructure.
- We welcome the consideration of potential for cumulative impacts, particularly in relation to other major schemes that may overlap with this proposal during the construction period.

Likely significant effects

- We welcome further information on the potential for significant effects of the traffic generated during the construction period of the English Onshore Scheme, and acknowledge that operational traffic is expected to be minimal.

Assessment methodology

- Subject to the extent of the impact of construction traffic on the SRN, mitigation may be required. National Highways will be able to advise on this once the results of scenario testing have been submitted to National Highways for review.

Chapter 13 - noise and vibration

Air Quality and Noise Assessments will be included as part of the Environmental Statement. We look forward to reviewing these assessments in due course.

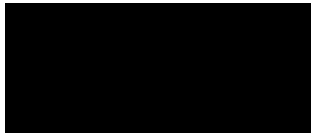
Standing advice

Please note that these comments imply no pre-determined view of the acceptability of the proposed development in terms of traffic, environmental, or highway considerations.

These comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the SRN in England, in line with DfT's Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway authority. The Local Planning Authority will determine the final scope of the Environmental Statement.

Please do not hesitate to contact me if you require any further information or clarification.

Yours sincerely,



Midlands Operations Directorate

Email: [redacted] [@nationalhighways.co.uk](mailto:[redacted]@nationalhighways.co.uk)

Date: 30 September 2025
Our ref: 525121
Consultation: Eastern Green Link 5 (EGL5) Scoping
Your ref: EN0210010



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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 National Grid, trading as National Grid Electricity Transmission plc (the 'Applicant') for an Order granting Development Consent for Eastern Green Link 5 (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: Eastern Green Link 5

Location: Scotland to Lincolnshire coast. Landfall at Anderby Creek

Thank you for your letter dated 2nd of September 2025 consulting Natural England on the Eastern Green Link 5 project Environmental Impact Assessment (EIA) Scoping Report. The following constitutes Natural England's formal statutory response. This advice is without prejudice to any further advice we may wish to make in light of further submissions on the presentation of additional information.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles (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) have 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 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 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 referencing 525121.

Yours sincerely

Sustainable Development
East Midlands 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 – EN0210010 Eastern Green Link 5 – 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 within it is extremely high level and based on a large area of search. The rationale for the inclusion of these large boundaries is due to substantial components of the projects remaining undetermined at the point of scoping, but also other aspects including incomplete data collection.

This makes it difficult to provide targeted advice on the scope of the assessments at this stage. Given the EIA scoping opinion from PINS is binding 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, 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 the Preliminary Environmental Information Report (PEIR) prior to the completion of the data collection and analysis, that consenting issues are identified late in the day and are not resolved in advance through pre-application discussions or data collection, and that Examinations are then unable to resolve these issues. This runs counter to the increased emphasis on ‘front-loading’ issues in the NSIP process, and the ambition of the British Energy Security Strategy as regards speeding up the consenting process.

In addition, Natural England highlight the risk that any additional data analysis has the potential to change the conclusions of the ES from those set out in the PEIR, which could cause potential delays to the project both during consenting and/or in the pre-construction phase. More generally, Natural England advises that 24 months of survey effort is the minimum expected evidence standard for bird and marine mammal data, to have any certainty to draw conclusions from and inform requirements for mitigation measures.

2. Focus of the Scoping Report

When scoping a project, developers, or their consultants, should satisfy themselves that they have addressed all the potential impacts and the concerns of all organisations and individuals with an interest in the project. Due to the capacious scoping envelope it is challenging to scope impacts out at this stage and therefore difficult for Natural England to comment meaningfully. Further consideration is likely needed in relation to the cable corridor and need for further scoping or ongoing discussions. However, due 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 the scoping report only considers the infrastructure required for the Project's grid connection, and not any interconnectivity that may be required as a result of the recommended coordinated approach for the East Coast Region outlined in the National Grid Electricity System Operator (ESO)'s Holistic Network Design (HND). However, if circumstances should change and a more coordinated/joined up approach for energy transmission for multiple NSIP projects is taken forward; we advise that thorough consideration will need to be given to consenting implications from infrastructure and interdependency and assessing in-combination/cumulative impacts. All of which may have implications for project timelines.

4. Impacts to Marine designated sites

The development of the Project is likely to result in cabling through or adjacent to the following marine designated sites located within 12nm of the English coastline:

- Holderness Offshore MCZ
- Southern North Sea SAC
- Greater Wash SPA

If impacts are found to cause lasting change or habitat loss such as from the use of cable protection, then without prejudice compensation or Measures of Equal Benefit (MEEB) is likely to be required. Similarly, if the project design changes and another MPA such as the Inner Dowsing Race Bank and North Ridge SAC can't be avoided then without prejudice compensation is likely to be required. 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 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.

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.

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.

Intertidal (Landfall)

Natural England notes the preferred landfall site at Anderby Creek and welcomes the Applicant's approach of using trenchless cable installation methods i.e. horizontally directional drilling (HDD), and the positioning of the exit pits entirely in the subtidal zone to avoid the sensitive intertidal zone and any features of conservation importance. Natural England advises a commitment is secured that only allows for use of a trenchless cable installation method HDD at landfall. This is so that the WCS/ MDS relates to this trenchless option, otherwise the application will require the worst-case scenario for open-cut methods to be included within their assessment.

Further to this, we would like to draw attention to the number of development projects that are currently seeking to make landfall within this section of the Lincolnshire coastline north of Wolla Bank SSSI between Anderby Creek and Theddlethorpe. There is a need to consider each of these projects collectively to ensure that each has sufficient space without collectively conflating any nature conservation concerns. We would therefore welcome a coordinated holistic network design approach at this location.

Natural England can provide the following advice regarding the technical aspects of landfall:

- ***Geotechnical Information***

Experience from other cable installations along the Lincolnshire Coast, has identified issues with the technical viability of Horizontal Directional Drilling (HDD) with failures and several sink holes and bentonite frac-outs occurring. Therefore, we advise at the time of consent geotechnical investigations in the form of boreholes, will be required to support the Application and demonstrate that HDD at landfall is feasible. As a minimum, Natural England advises that geotechnical data from the intertidal area of the project and the entry and exit pit locations are most relevant, particularly 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 EGL5 providing a similar document.

- ***Exit pit locations***

Natural England advises consideration of the length of HDD and punch out/exit pit locations given the presence of a sunken forest along this stretch of coast which would need to be avoided.

In addition, when considering exit locations, we advise there is likely to be a requirement for cable protection due to the dynamic nature of the coastline and erosion. With this in mind the need for cable protection will need to be fully justified with consideration given to MCA issues, due to reducing water depth by no more than 5%, changes in seabed elevation over the lifetime of the project and avoiding disruption of sediment transportation. We advise considering other projects in the area and the lessons learned from their development works.

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):

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

³ [National Policy Statements for energy infrastructure - GOV.UK \(www.gov.uk\)](#)

mitigation.

Protected landscape

The English Onshore Scheme scoping boundary includes the setting the Lincolnshire Wolds 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 the Management Plan: [Management Plan - Lincolnshire Wolds Countryside Service \(lincswolds.org.uk\)](https://www.lincswolds.org.uk/our-work/management-plan)⁴.

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.

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.

We strongly encourage the obtaining and sharing of survey results data from other live cabling projects such as EGL3&4, Grimsby to Walpole and Ossian Transmission Infrastructure.

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.

Cumulative impacts

Natural England is aware there are multiple separate proposed energy schemes seeking landfall along this section of the Lincolnshire coast which will need to be assessed in combination. We would strongly encourage an overall coordinated and holistic approach is adopted for the projects to minimise environmental impacts particularly during construction, and would welcome strategic discussions with the Applicant on this.

We welcome the engagement undertaken so far with the EGL5 project, and particularly the emerging join-up with other live projects including EGL3&4, Grimsby to Walpole overhead lines and Ossian Transmission Infrastructure. As the scoping boundary is refined, more detailed advice will be provided by Natural England at Topic Working Groups (TWG) meetings with the Applicant during the pre-application process.

⁴ <https://www.lincswolds.org.uk/our-work/management-plan>

Annex B – EN0210010 Eastern Green Link 5 – 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.
- 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 but not limited to include:

- Eastern Green Link 3 and 4
- Lincs Node
- Meridian Solar Project
- National Grid Grimsby to Walpole project
- National Grid North Humber to High Marnham project
- Ossian Transmission Infrastructure
- Outer Dowsing Offshore Windfarm
- Peak Carbon Capture Cluster
- RAPID Mablethorpe Desalination
- Theddlethorpe Flexible Generator
- Theddlethorpe Nuclear Storage
- Viking Carbon Capture and Storage pipeline

Natural England advises that all plans/projects which have ongoing impacts that impact upon protected sites and their qualifying species 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.

⁶ [Bird Migration Atlas](#)

4. Biodiversity and Geodiversity

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

The [National Planning Policy Framework \(NPPF\)](#) sets out guidance on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

4.1 Use of EIA Matrices

Natural England notes that the approach to the assessment is proposed to align with EIA approaches used on other projects. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances where significance has been presented as a range (i.e., 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 has identified ecological impacts that are assessed as significant in EIA terms, either cumulatively or in-combination which is surprising. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features are not incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach⁷.

4.2 Use of the Rochdale Envelope

Natural England recognises the need to use a Rochdale Envelope approach to allow flexibility in project design to ensure that changes in available technologies and project economics can be considered post consent. However, Natural England has concerns over the extent to which uncertainty in ground conditions is driving the extent of the project envelope, and that the Rochdale Envelope approach is resulting in the provision of insufficient baseline information to inform both project design and assessment of impacts. The lack of understanding of the ground conditions results in the use of Maximum Design Scenarios (MDSs) that are conservative enough to make up for that lack of understanding and allow for all eventualities. However, this translates into a vast number of variables, 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.

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.

⁷ [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

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 the Lincolnshire Wolds National Landscape and its setting (see section 10). This should include robust assessment of alternative route options along with proposed construction methods and their feasibility, such as use of HDD, and their efficacy in terms of mitigation. Cumulative impacts with other projects should also form part of the assessment (see section 2).

5. Designated Nature Conservation Sites

The ES should thoroughly assess the potential for the proposal to directly or indirectly affect nationally and internationally designated sites of nature conservation importance.

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:**

- Berwickshire and North Northumberland SAC
- Flamborough and Filey Coast SPA
- Gibraltar Point SPA/ Ramsar site
- Greater Wash SPA
- Humber Estuary SPA/ Ramsar Site/ SAC
- Inner Dowsing, Race Bank and North Ridge SAC
- North Norfolk Coast SAC
- River Tweed SAC
- Saltfleetby to Theddlethorpe Dunes and Gibraltar Point SAC
- Southern North Sea SAC
- The Wash and North Norfolk Coast SAC.
- The Wash SPA/ Ramsar site
- Tweed Estuary SAC

For information, the proposals also fall within the tentative East Coast Flyway World Heritage

Site⁸, submitted by the UK in April 2023 for consideration by UNESCO as ‘a globally important site for migratory waterbirds and for its nearly contiguous complex of ecologically connected and immensely variable coastal wetlands’.

Further information on the location of designated sites and their special interest features can be found at www.magic.gov.uk. Further information on European site special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available at <http://publications.naturalengland.org.uk/category/6490068894089216> and <https://designatedsites.naturalengland.org.uk>.

5.2 Habitats Regulations Assessment

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>

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

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).

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> i) Potential impacts from temporary and permanent habitat loss, noise and visual disturbance, and air and water quality/ hydrological changes (see below) arising from the proposals may affect notified bird species and assemblages particularly associated with the Greater Wash SPA and the nearby The Wash SPA/ Ramsar site, Gibraltar Point SPA/ Ramsar site and Humber Estuary SPA/ Ramsar site. These impact pathways should be fully addressed within the HRA. This should include functionally linked land outside the designated site boundaries which may be used and relied on by SPA/ Ramsar birds for foraging habitat and roosts. ii) We note there will be a single year of survey for bird surveys. 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. The site falls within a distance that it is considered possible to affect species from The Humber Estuary SPA (e.g., golden plover). This may also apply to areas towards the eastern end of the project where SSSI populations could be affected, unless there is suitable existing data that can be included in assessment. iii) Please note non-breeding golden plover may be disturbed by human activity within 200-500m and curlew within 650m, which this should be factored in within habitats that could support these species. It is acceptable that optical equipment is used to reach similar distances where access to land is not directly possible. iv) Duration of impact should also consider typical lifespans of species affected, e.g., golden plover typically live for four years, where five years of ‘temporary’ impact could represent a permanent impact for a proportion of those populations. v) We also refer you to Natural England’s advice regarding onshore and offshore ornithology in our Relevant Representations to the National Planning Inspectorate on the Outer Dowsing proposals, on the 13th June 2024, available here¹⁰ (Planning Inspectorate Reference EN010130).
Air quality	For sections of the cable route/ landfall site which will involve construction traffic movements within 200m of the designated sites,

¹⁰ [EN010130-000700-Binder1.pdf \(planninginspectorate.gov.uk\)](#)

	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)

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: Holderness Offshore 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.

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 (HPMA) – 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 HPMA 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.

- Sea Bank Clay Pits SSSI
- Saltfleetby - Theddlethorpe Dunes SSSI
- The Wash SSSI
- Chapel Point - Wolla Bank SSSI
- Candlesby Hill SSSI
- Humber Estuary SSSI
- Gibraltar Point 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 be impacted include Claxby Chalk Pit SSSI, Dalby Hill SSSI, Hoplands Wood SSSI, Willoughby Wood SSSI, Willoughby Meadow SSSI and Skendleby Psalter Banks SSSI.

The proposed development also lies in proximity to the Lincolnshire Coronation Coast National Nature Reserve (NNR).

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The ES should include a full assessment of the direct and indirect effects of the development on the notified features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The consideration of likely significant effects should include any functionally linked land

outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and amphibians. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

The assessment should include consideration of the key issues/ impact pathways raised in section 5.2 above for European and international designated sites.

5.5 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 group. The ES should set out proposals for mitigation of any impacts and if appropriate, remediation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

6. Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 (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.

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 not engaged to date with the Applicant regarding protected species. GCN District Level Licensing is not currently available in the Lincolnshire area. The NE Wildlife and Licensing Service (NEWLS) is able to engage with the Applicant on GCN and other protected species licensing matters through a Pre-Submission Screening Service, whereby they assess a draft licence application and provide a Letter of No Impediment (LoNI). Further information on this process is set out within [Advice Note 11, Annex C](#).

7. Habitats and Species of Principal Importance

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/IEEMA/CIRIA good practice principles (2016) and guidance (2019).
- Use the statutory metric to calculate BNG and adhere to the rules and principles set out within the metric guidance¹¹.

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 Lincolnshire Wolds National Landscape

¹¹ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

and its setting (formally known as the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB)).

The development site is also within the proposed Lincolnshire Heritage Coast Designation (see section 10.2).

Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The overarching [Energy National Policy Statement EN-1](#)¹² (section 5.10) provides significant protection for these nationally designated landscapes including their settings.

Assessment should be made of the direct and indirect effects on this designated landscape and in particular the effect upon its special qualities and purpose for designation – conserving and enhancing natural beauty. The management plan for the designated landscape may also have relevant information that should be considered in the EIA (see section 10.3).

As part of the proposals, the English Onshore Scheme Scoping Boundary and the Alford Bypass Construction Route near Alford is located adjacent to the Lincolnshire Wolds National Landscape. Even with underground cabling, significant adverse effects on the national landscape could occur as a result of construction works.

The ES should also provide robust assessment of alternative route options along with proposed construction methods and their feasibility, such as use of HDD, and their efficacy in terms of mitigation. Robust justification will be needed where the proposed cable corridor route cannot avoid the Lincolnshire Wolds National Landscape or its setting.

The ES should also include assessment of impact of severance on biodiversity and the functionality of habitats at a landscape scale in the national landscape setting. This should include how impacts to these features will be avoided.

Natural England would also encourage the Applicant to engage with the Lincolnshire Wolds National Landscape Partnership to discuss potential impacts of the proposals national landscape.

We also recommend the Applicant refers to Natural England and Lincolnshire Wolds Partnership working advice provided to the Outer Dowsing Offshore Windfarm Section 42 draft application consultation (20 July 2023), in relation to Development of Lincs Node. This is provided alongside this letter for ease of reference (labelled Annex H).

10.2 Heritage Coast

The proposals are also located within an area which Natural England has assessed as meeting the criterion for definition as a Heritage Coast. Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the special character of this area may be a relevant matter in the determination of the proposal. Natural England considers the Lincolnshire Heritage Coast to be a valued landscape in line with paragraph 191 of the NPPF.

¹² <https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f637052/overarching-nps-for-energy-en1.pdf>

An assessment of the landscape and visual impacts of the proposal on this area should be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any infrastructure development should consider its impact on the area, reflect and enhance its intrinsic character and natural beauty and be in line with relevant National Policy Statements and development plan policies.

A new Heritage Coast is formally defined once a Memorandum of Agreement is signed by Natural England and the local authorities which cover the area. Following signing of the agreement, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation, in line with the NPPF and NPS EN-1 sections 5.6.13, 5.10.10 and 5.10.11.

10.3 Landscape/Seascape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity. Links for Landscape / Seascape Character Assessment at a local level are also available on the same page:

<https://www.gov.uk/government/publications/seascape-assessments-for-north-east-north-west-south-east-south-west-marine-plan-areas-mmo1134>

<https://data.gov.uk/dataset/3fed3362-2279-4645-8aaf-c6b431c94485/mmo1037-marine-character-areas>

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape/ seascape assessment methodologies](#). We encourage the use of Landscape and Seascape Character Assessment (LCA/SCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA/SCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A Landscape and Visual Impact Assessment (LVIA) should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and 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 Lincolnshire Wolds AONB Management Plan 2018 – 2023 can be found here: [Management Plan - Lincolnshire Wolds Countryside Service \(lincswolds.org.uk\)](#)¹³.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area (see section 2 above). This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be

¹³ <https://www.lincswolds.org.uk/our-work/management-plan>

taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

11. Connecting people with nature

The ES should consider the potential impacts on the King Charles III England Coast Path National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the King Charles III England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

12. Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey 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>

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

- 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.

18. 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.

19. Marine Mammals Impact Assessments

If not already considered, we advise Applicants to include reference to the following

- IAMMWG. 2022. *Updated abundance estimates for cetacean Management Units in UK waters (Revised 2022)* <https://hub.jncc.gov.uk/assets/3a401204-aa46-43c8-85b8-5ae42cdd7ff3>
- *Scientific Advice on Matters Related to the Management of Seal Populations: 2021* <http://www.smru.st-andrews.ac.uk/files/2022/08/SCOS-2021.pdf>
- Carter et al. (2022) <https://www.frontiersin.org/articles/10.3389/fmars.2022.875869/full>

20. Red Throated Divers

Natural England highlights our increasing concerns in relation to disturbance and/or displacement of red-throated divers features from the more persistent presence of offshore wind farm and oil and gas related vessel activity which could make a meaningful contribution to in-combination effects to the Greater Wash SPA and indeed the adjacent Outer Thames Estuary SPA depending on the transit route. As such, we advise appropriate consideration of both seasonal timing of construction and O&M works, and vessel transit route is included within the application.

Natural England recommends that 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.
- 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 – EN0210010 Eastern Green Link 5 (EGL5) – Natural England’s advice on EIA Scoping – Project-Specific Detailed Advice to the Offshore Elements of the Scheme

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
1	3.9.1, 3.9.3 & 3.9.5	Section 3 – Consideration of alternatives - Options Appraisal	Natural England is pleased to see that alternative landfall locations along the Lincolnshire coast were considered and EGL5 has taken on board advice from Natural England and the MMO, as well as feedback from EGL3 and EGL4, with two potential landfall options identified. In addition, we are pleased to see the reasoning for the selection of Anderby Creek and exclusion of Theddlethorpe due to the presence of Saltfleetby to Theddlethorpe Dunes & Gibraltar Point SAC and Saltfleetby – Theddlethorpe Dunes SSSI.	No further recommendations
2	3.9.23 4.3.3.1 Table 4-2	Offshore Route Corridor Project Description - Anderby Creek Landfall	Para 3.9.23 mentions the HDD drill length required to navigate below protected features at Theddlethorpe would be 1700m and notes is beyond the maximum length of any known HVDC landfall cable in the UK and is consequently given as a reason for the exclusion of this landfall location. However, Table 4.2 gives an approximate HDD drill length of 1600m as needed to pass under Anderby Creek. It is noted in Para 4.3.31 that <i>“The breakout point from the HDD is subject to the appointed Principal Contractor’s final design and dependent on the ground conditions and depth of the cable needed to be achieved to ensure suitable protection, however HDD’s can typically be up to 800 to 1,200 m in length, and the maximum known HVDC cable landfall HDD</i>	Natural England advises the Project undertakes feasibility studies and ground investigations including undertaking baseline habitat surveys of coastal habitats to inform the methodology and environmental assessments. A key output of this will be providing a Landfall HDD (trenchless cable installation methods) Feasibility report. The project should take into consideration lessons learned from other projects that have made landfall along the Lincolnshire coast and elsewhere nationally

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			<i>in the UK is 1.6 km”.</i> Considering the anticipated distance for trenchless cable installation, Natural England seeks clarification this will be possible at Anderby Creek and also details of the associated risks with using trenchless cable installation methods over this distance.	
3	4.3.25 to 4.3.34 including Table 4-2.	Project Description - Anderby Creek Landfall	The project description provides a high-level overview of the proposed works, with some detail on route options, proposed landfall location (<i>i.e.</i> at Anderby Creek) and main construction methods. While this provides sufficient information at the Scoping Report stage enabling the Applicant to identify key likely significant effects on coastal habitats at landfall, Natural England notes that additional impacts may be identified when information from the forthcoming baseline surveys and site investigations are undertaken. In addition, Natural England understands that the project design will continue to be developed, with the PEIR presenting data from forthcoming ecological and geophysical surveys.	Natural England advises the project should continue to develop and finalise the project design and construction methods using the forthcoming baseline survey data and analysis, in particular the feasibility and commitment for trenchless cable installation.
4	4.4.18	Project Description – Anderby Creek Landfall	The Applicant lists, from south to north, the proposed landfall order of projects at Anderby Creek <i>i.e.</i> Triton Knoll, EGL4, EGL5, EGL3. Later in the document (para 18.4.57.) Ossian OWF and ODOW export cables are noted as also making landfall at Anderby Creek. Where does this fit in the positioning? Is there sufficient room considering the required separation	Natural England advises clarification is provided within the application documents to provide confidence there is sufficient space at landfall for this number of projects

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			distances and working widths, and in terms of overlapping construction periods?	
5	4.4.4 Table 4-6	English Offshore Scheme	It is noted that site characterisation surveys may involve pre-construction geotechnical surveys. Such surveys have the potential to cause injury and/or disturbance to cetaceans and, therefore, mitigation measures may be necessary. Depending on the duration of the surveys, an assessment of the need for a European Protected Species (EPS) licence may also be required. In addition, if the surveys (or any other activity that could have likely significant effects on the site) are carried out within or within the foraging range of any marine mammal SAC, a Habitats Regulation Assessment should be carried out to assess the impact of those surveys.	Natural England advises EGL5 to adhere to the JNCC marine mammal mitigation guidelines for geophysical surveys and submitting relevant data to the JNCC Marine Noise Registry: https://mnr.jncc.gov.uk/ A Habitats Regulation Assessment will be needed for any marine mammal SACs within the zone of influence of the development.
6	6.4.9 and Table 19-6	Biodiversity, and Coastal and Marine Physical Processes	Natural England advises the additional key sources of data the Applicant should consider are: • Anglian Regional Coastal Monitoring Programme data available - https://coastalmonitoring.org/ including bathymetry, coastal habitat mapping, lidar, aerial imagery, tides/ wave data • NCERM2 (updated since NCERM) and available through https://environment.data.gov.uk/shoreline-planning - includes data on Shoreline Management Plans, flood assets, coastal erosion	Natural England advises the inclusion of the additional data sources.

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			Local reports e.g. Saltfleet to Gibraltar Point Beach Management Strategy which would provide data on the nearshore Designated Site View for information on site condition https://designatedsites.naturalengland.org.uk/SiteSearch.aspx	
7	6.1.10 Current Baseline and Table 6-5	Biodiversity	The Applicant has identified the international designated sites within 10km of the proposed Order of Limits. For coastal sites, Natural England advises the Applicant should consider whether this is sufficient to understand the effects of landfall construction/operation on the structure, function and supporting processes of each designated site. For example, how works may influence coastal processes modifying tide/ wave and sediment supply (although covered in Chapter 18) especially to those sites to the south of the sediment cell. Sediment transport along the Lincolnshire coast is predominately in a southwards direction that is close to the shore (driven by tidal asymmetry). This means that any impacts on sedimentary process could influence the amount or type of sediment reaching internationally designated sites to the south of the cable installation/ landfall point (namely Saltfleetby-Theddlethorpe Dunes and Gibraltar Point SAC) and The Wash and North Norfolk Coast SAC. Further data should be collected to confirm that it is appropriate to scope these sites out.	Natural England advises the Applicant should continue to consider international designated sites (particularly Gibraltar Point Dunes and potentially The Wash and North Norfolk Coast SAC) and possible changes to coastal processes as the project design is finalised and the cable installation/ construction methods are confirmed. This should be informed by available baseline data. Refer to the SAC published Conservation Objectives or Supplementary Advice which identifies attributes and target for each feature.

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
8	6.6. Likely Significant Effects Table 6-8 6.7.5 EIA	Biodiversity	Natural England recognises that at the scoping stage there is limited information on specific project design and construction methods, the list of potential impacts on biodiversity during construction needs to be expanded (Table 6-8) considering the works being undertaken. For example, there is a risk of damage to terrestrial intertidal habitats from bentonite breakout during construction if using trenchless cable installation measures.	Natural England advises the Applicant should review the potential impact pathways and likelihood of potential significant effects, and refine these, including where required those receptors/effects scoped out. A final list of receptors, effects should be presented in the ES.
9	18.4.2 And 18.7.2	Coastal and Marine Physical Processes	The Applicant states that: <i>“The Study Area identified acts a precautionary maximum zone of influence and incorporates the area within which there is the potential for direct impacts associated with the deposition of suspended sediments. It has been validated through reference to fine sediment modelling calculations presented in the Eastern Green Link (EGL) 3 and EGL 4 PEIR which indicates suspended sediment concentrations of more than 10 mg/l are constrained to less than 10 km from the English Offshore Scheme Scoping Boundary (Ref 18.26)”</i>. In our advice to Eastern Green Link (EGL) 3 and EGL 4 PEIR, Natural England highlighted the need to report on the type of the spreadsheet-based model used for calculations for suspended sediment concentrations, its setting and validation and data input, as only modelling results were provided. Therefore, until more information is provided on the fine sediment	Natural England advises the Applicant provides information on the fine sediment modelling calculations and the description of the modelling techniques presented in the Eastern Green Link (EGL) 3 and EGL4 PEIR, as the spreadsheet based model used for calculations suspended sediment concentrations was not described in the Eastern Green Link (EGL) 3 and EGL 4 PEIR. Until more information is provided on the fine sediment modelling calculations, Natural England cannot consider these data as a reliable source to inform the boundary of the Study Area.

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			modelling calculations, Natural England cannot consider these data as a reliable source to inform the boundary of the Study Area.	
10	18.4.3	Coastal and Marine Physical Processes	According to Applicant the <i>“Study Area would likely be refined once particle size analysis following survey has been completed for the English Offshore Scheme to ensure similar suspended sediment concentrations and predicted distances are anticipated.”</i>	Natural England queries whether the EIA, for which our next opportunity to review will be at the PEIR stage consider the definitive data for the Study Area.
11	18.4.9 Table 18.10	Coastal and Marine Physical Processes	It is stated that, <i>“The EMODnet DTM has been used to inform the baseline understanding of bathymetry across the Study Area. The DTM is based on bathymetric data from various sources including UKHO survey data”</i>. The Applicant has not provided information on when the data used to create the EMODnet DTM were collected. Natural England advises it is important that the most recent bathymetric data are available to inform construction works. However, it is understood (Table 18.10) that the Applicant has undertaken geophysical surveys, including MBES) within the Study Area.	Natural England advises the most recent bathymetric data are available to inform construction work methods, such as bedforms clearance, excavation of HDD pits, etc, and related impacts. It is understood that the EMODnet DTM data has provided an initial baseline for the bathymetric features and ongoing geophysical investigations.
12	18.4.19 to 18.4.22 and 18.8.3	Coastal and Marine Physical Processes	Metocean data and use on wave modelling and EIA assessment.	Natural England advises the temporal range of metocean data (e.g. from SEASTATES) considered for the EIA assessment should be provided, especially if those data are then used for wave modelling or any wave modelling undertaken in previous project relies on those or different data.
13	18.4.35 and Table 18-9		The document notes <i>“The Lincolnshire shoreline management plan along the coastline within the</i>	Natural England advises the Applicant should consider the future coastline i.e. with regards to

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			<i>Study Area is to hold the line for the epoch 2025 to 2055. The strategy for 2055 to 2105 is pending agreement</i>". In Table 18-9 under Disturbance of intertidal seabed morphology, for the operation phase it notes that the "<i>The proposed Landfall is sited in areas where coastal management practices are to hold the line</i>". Natural England advises this is not strictly true as the strategy has not been published and the policy for this period agreed. If the scheme starts in 2035 and is operational for 40 years Natural England advises the Applicant needs to consider exposure due to coastal retreat over this period i.e. up until at least 2075.	climate change and sea-level rise. It is likely that over the 40 years of proposed operation that there will be changes to the coastline due to coastal retreat even under a 'Hold the Line' scenario but more importantly if the strategy changes to a No Active Intervention policy with the cessation of beach nourishment.
14	18.4.48 Table 18-7	Coastal and Marine Physical Processes	Please check the SSSI citation for reason of notification for Chapel Point to Wolla Bank SSSI as this is a geological site and while intertidal sediments are a feature of interest, marshes and sand dunes are not mentioned in the citation	Natural England advises this minor point is clarified.
15	18.4.57 and Section 30 Cumulative Effects	Coastal and Marine Physical Processes	The Ossian, ODOV offshore windfarm export cables and the EGL3 and EGL4 interconnector projects are planned to make landfall at Anderby Creek, Lincolnshire. The potential for cumulative effects will be considered as part of the future EIA documents in accordance with the approach and guidance outlined within Part 4, Chapter 30: Cumulative Effects.	Natural England notes that cumulative effects from landfall of cables at Anderby Creek and other industrial activities will be assessed in future EIA documents.
16	18.6.2 Table 18.9	Coastal and Marine Physical	Disturbance of intertidal seabed morphology. This impact has been scoped out for potential impacts on coastal and marine physical	For this impact pathway to be scoped out, Natural England advises the Applicant must be confident and fully committed within the

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
		Processes	processes during the three stages of the project on the assumption that HDD will be utilised. The uncertainty around the trenchless crossing feasibility at the landfalls options is further highlighted in Paragraph 3.9.5, which states that: <i>"it would be necessary to carry out ground investigation works before confirming whether an HDD trenchless solution is feasible at either landfall"</i>. Natural England's experience HDD is not always fully successful at this location, therefore, the worst-case scenario for impacts in intertidal coastal areas is the open-cut trench scenario.	application documents to a trenchless installation technique such as HDD at landfall. Natural England advises the Applicant to refer to our advice provided to the EGL3 and EGL4 project at Section 42 PEIR on this matter.
17	18.6.2 Table 18-9	Coastal and Marine Physical Processes	There is potential for the project to cause 'Modifications to tidal and wave regimes and associated impacts to morphological features' from nearshore cable protection and potentially alter sediment transport particularly within the intertidal zone. The Wash and North Norfolk Coast SAC, the Humber Estuary SAC and Saltfleetby to Theddlethorpe Dunes SAC are within the zone of influence for the scoping boundary. Both sites contain features which rely on sediment transport along the coast.	Natural England agrees this impact pathway could be scoped out for the construction phase, <u>providing</u> the project is committed to trenchless installation technique such as HDD at landfall and that no other infrastructure is used during construction such as cofferdams (noting the commitment to no use of a cofferdam in Para 4.2.24). Otherwise, modification to tidal and wave regimes within the intertidal zone from construction activities as well as O&M and decommissioning should be scoped in. It is Natural England's preference as a precaution this impact pathway is scoped in.
18	18.6.2 Table 18.9	Coastal and Marine Physical	<i>Temporary increase and deposition of suspended sediments (Changes in suspended solids and water clarity)</i> impact pathway.	Natural England advises the Applicant should provide information on the assessment methods and if data are the results of modelling of

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
		Processes	Natural England advises any assessment of temporary increase and deposition of suspended sediments should be informed by data whose source is clearly explained. Any modelling of suspended sediment concentrations should be fully reported to assess the appropriateness of methods and techniques, not just presenting the modelling results.	suspended sediment concentrations, modelling techniques should be presented in full.
19	18.7.5	Coastal and Marine Physical Processes	It is stated that wave modelling from the EGL3 and EGL4 application may be used to assess and inform this study.	Natural England advises any model outcomes should be reported with full details of modelling techniques and data sources.
20	19.4.21 Table 19.8 Figure 19.2	Benthic Ecology	Holderness Inshore MCZ has not been included in the Table 19.8 or Figure 19.2. It is assumed this site is outside the 15km buffer area for the scoping red line boundary.	It would be useful if the Holderness Inshore MCZ could be included in Figure 19.2, so it is transparent this site is outside the 15km buffer for the scoping boundary.
21	19.6.2 Table 19-9 and 18.6.2 Table 18.9	Benthic Ecology And Marine and Coastal Processes	The potential impact for Temporary increase and deposition of sediments (<i>Changes in suspended solids (water clarity) Smothering and siltation rate changes Hydrocarbon and Polycyclic Aromatic Hydrocarbons (PAH) contamination</i>) has been screened out within the <u>Intertidal</u> zone. While it is stated the proposed development will use a trenchless technique such as HDD at landfall, as the Applicant states there remains for bentonite frac-out between the drilling bore and the seabed or sediment surface.	Natural England therefore advises this impact pathway is scope in for construction and as outlined, measures to manage any such spills are included within a detailed frac-out management plan.
22	19.6.2 Table 19.9	Benthic Ecology	Accidental Spills impact pathway. At this stage Natural England is unable to take mitigation	Natural England advises Accidental Spills should

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
	and 18.6.2 Table 18.9	And Marine and Coastal Processes	measures into account.	be scoped in at this early stage.
23	20	Fish and Shellfish	Natural England's remit is to focus on fish and shellfish where they are designated features or in terms of prey availability to features of designated sites. Natural England also defers to the expertise of Cefas on matters of fish and shellfish ecology.	Please see our advice to the onshore aspects of the scheme for our advice to river and sea lamprey. Natural England advises Cefas is consulted to review and comment on the Fish and Shellfish ecology section.
24	21.6 Table 4-6	Offshore Ornithology	The Applicant describes the potential impacts arising from the construction, operation and maintenance, and decommissioning of the English Offshore Scheme on intertidal and offshore ornithology (21.1.1). However, it is unclear if all pre-commencement activities associated with construction and potential impacts are considered (Table 4-6).	Natural England advises clarification is required as to whether the potential impacts of all pre-construction activities (e.g. seabed surveys, seabed preparation) are included in the Scoping and highlight that all project impacts should be assessed, including those requiring a separate Marine Licence e.g. UXO surveys, identification and clearance).
25	21.4.3 21.7.2 Table 21-4	Offshore Ornithology	Natural England notes that a displacement buffer of both 4km (Table 21-4) and 10 km (21.4.3) is quoted for assessment of disturbance to red-throated diver, whilst a displacement distance of 2km for red-throated diver and 2.5 km for common scoter will be used for a vessel disturbance assessment (21.7.2).	Natural England advises that a maximum buffer of 10km is only typically applied to assess displacement effects to red-throated diver from offshore wind farms (with buffers of 4 km for seaduck). We have previously considered a 2km buffer for assessment of vessel displacement effects for both species but given some recent evidence of effects on common scoter beyond 2km, we are content with the approach proposed by the Applicant.

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
26	21.4.3	Offshore Ornithology	Natural England notes the Applicant's intention to use the 2022/2023 winter RTD ornithological survey data to inform their EIA.	We welcome the Applicant's intention to use the most up-to-date survey data, noting that NE survey data can be made available for January and February 2022, in addition to the two October 2022, and January and February 2023 survey data.
27	21.4.31	Offshore Ornithology	Natural England notes that regular patterns of species occurrence are categorised into resident, summer visitors (breeding) and winter visitors (non-breeding).	Whilst this categorisation may be appropriate for most species, it does not take account of migratory species such as ruff and whimbrel, which may only use sites on passage. Natural England advises this is considered within the assessment documents.
28	Table 21-12	Offshore Ornithology	Species seasonality for designated sites	Natural England recommends this table receives QA (e.g. little gull, ringed plover) before inclusion at the PEIR stage.
29	21.5.4	Offshore Ornithology	Design and control measures are discussed, including Environmental Management Plans (EMPs) and other environmental measures relevant to offshore and intertidal ornithology. Natural England notes these will be provided with the PEIR and ES.	Natural England welcomes the intention to commit to measures to avoid or reduce potential significant effects. However, we note that the suggested vessel-related measures will be adopted only 'where practicable'. We highlight that any proposed measures should give confidence that they will be effective throughout the period of occupation of the feature potentially impacted.
30	21.7.2	Offshore Ornithology	The Applicant states that Natural England recommends a seasonal restriction on licensable activities taking place within the Greater Wash SPA between September and April inclusive, during the wintering period for red-throated diver	Natural England acknowledges our recommendations in Advice on Seasonality but highlight that for the purposes of this development, a seasonal restriction of November to March inclusive would be the most appropriate

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
			and common scoter.	season to mitigate impacts on red-throated diver and common scoter in the Greater Wash SPA. Natural England also highlights the importance of the mitigation hierarchy when planning projects, particularly where LSE cannot be ruled out. We advise that the Applicant gives full consideration as early as possible to measures that would avoid and/or mitigate potential impacts. Where these are considered unavoidable, we advise that further measures to restore and/or compensate such impacts may be necessary.
31	21.7.3 (cont.)	Offshore Ornithology	Natural England notes that both a spatial and temporal assessment of vessel impacts from works is planned, including ideally on a monthly basis.	Natural England welcomes the Applicant's intention to conduct both a spatial and temporal assessment, including using the 'bird-days-lost' method, noting that for the Greater Wash SPA, under the operation 'power cable: laying, burial and protection' and 'operation and maintenance' for the visual disturbance pathway, the pressure benchmark states; <i>'The daily duration of transient visual cues exceeds 10% of the period of site occupancy by the feature'</i>, for both red-throated diver and common scoter. We highlight however that the benchmark should not be considered a threshold <i>per se</i>, as stated in the report on which the Advice on Operations is based (Pérez-Domínguez et al, 2016), i.e. a benchmark does not signify a threshold above which the defined sensitivity score applies and below which there is lower or no sensitivity

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
				We agree that a month-by-month assessment would be preferred.
32	21.7.15	Offshore Ornithology	Natural England notes that the Cumulative Effects chapter of the PEIR will present the long and short lists of 'other developments' which will be considered at the ES stage.	Natural England welcomes presentation of cumulative effects at PEIR and highlights that all developments should receive consideration, including from offshore wind (wind farms and associated vessel transits).
33	21.8.2	Offshore Ornithology	Natural England notes that it is the Applicant's intention to use a variety of data sources, including NE's most recent survey data of the Greater Wash SPA, as well as the original pre-designation survey data, and outputs from nearby offshore wind farms. For reference, the NE datasets available are; density surfaces from the NE winter surveys of the Greater Wash SPA from January and February 2022, and density surfaces from winter surveys of the Greater Wash SPA plus 10km seaward buffer, from October 2022 (2 surveys), and January and February 2023.	Natural England considers this is a sensible approach.
34	22.4.29 Figure 22-2	Marine Mammals	Paragraph 22.4.29 states that the harbour seal foraging area is within 40 – 50 km of their haul out site which has set the study area for these species. Figure 22-2 includes a buffer 50km from the coastline and shows that the Teesmouth and Cleveland Coast SSSI is located beyond 50km of the scoping boundary.	Natural England therefore does not expect the Teesmouth and Cleveland Coast SSSI to be scoped in for harbour seal.
35	22.4.51	Marine Mammals	We note that Grey Seal as a feature of Berwickshire and Northumberland Coast SAC has been scoped in	Natural England recommends the assessment uses the following information when assessing: D2019 00004409 Grey Seals condition

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
				monitoring 2016 Final Version.PDF
36	22.5	Marine Mammals	Natural England agrees that the listed embedded mitigation protocols are relevant to the marine mammal assessment. However, we advise that more measures may be required to manage disturbance in the SNS SAC in the event that cabling activities take place simultaneously with other OWF construction or noisy activities in the SAC and this should be thoroughly assessed in the cumulative impact assessment. These plans and contingencies will need to be outlined in detail as part of the ES. Furthermore, a Site Integrity Plan (SIP) will need to be produced which will specify exactly how these plans will be implemented as part of marine licence. We reserve the right to comment on the suitability of these documents in mitigating impacts when they are submitted as part of the consultation process.	The ES will need to demonstrate that the necessary plans and safeguards are built into the programme to account for project alone and multiple in-combination events. Natural England advises the application also includes an outline Site Integrity Plan (SIP) to be submitted with the application.
37	22.5	Marine Mammals	Natural England notes that it is proposed that a Marine Mammal Mitigation Plan (MMMP) will be developed should UXO clearance be required, with the use of low noise methods being used for any UXO clearance by default. Furthermore, any UXO clearance shall be assessed within a separate Marine Licence.	Natural England advises a MMMP would be required for any investigative geophysical/seismic surveys undertaken along the cable route. Such surveys would be required to identify any UXOs requiring clearance, and whether any high-order contingency clearance would be required. Delaying the submission of such required documents risks delaying future pre-application discussions, or data collection, and runs counter to the increased emphasis on “front-loading” issues in the NSIP process. It is recommended any pre- or post-clearance

Point	Section/Para/ Table/Figure Ref	Topic	Comments	Recommendations
				data be uploaded to the Marine Noise Registry: https://mnr.jncc.gov.uk/ Defra have recently published their Marine Noise package, which as well as their Marine Noise Policy paper, includes several updated guidance documents in relation to the clearance of UXO, for clarity these are; • An updated Unexploded Ordnance (UXO) Joint Position Statement, which can be found here - Marine environment: unexploded ordnance clearance Joint Position Statement - GOV.UK • UXO clearance supporting guidance providing more detail for Supporting minimising environmental impacts from unexploded ordnance clearance - GOV.UK JNCC have also published new mitigation guidelines for UXO clearance, which can be found here - JNCC guidelines for minimising the risk of injury to marine mammals from unexploded ordnance (UXO) clearance in the marine environment JNCC Resource Hub

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Lincolnshire Wolds Area of Outstanding Natural Beauty (LW AONB) - Natural England and The Lincolnshire Wolds AONB Partnership joint working response highlighting identified concerns for the Development of Lincs Node and associated plans/projects – July 2023

This note sets out the current, shared views of Natural England and the Lincolnshire Wolds AONB partnership to help inform **landscape** impact discussions on future plans or projects proposed along the Lincolnshire coast.

This position pertains to the potential implications on the designated landscape of the Lincolnshire Wolds AONB and Lincolnshire Heritage Coast from the proposed development of the Lincs Node grid connection point and 'Energy Hub' (Natural England terminology) on the Lincolnshire coast to meet national energy security demands and the governments Net Zero targets.

Lincolnshire Wolds Area of Outstanding Natural Beauty (LW AONB)

The Lincolnshire Wolds was statutorily designated an AONB in 1973. This recognised the area as one of England's finest landscapes, unique and with a distinctive 'sense of place'. The Landscape Character Assessment (CCP414, 1993) acknowledged the following outstanding qualities:

- **A unique physiography (geology and topography)** – The physical geography of the Lincolnshire Wolds is unusual and distinctive. The Wolds is the highest upland landscape in eastern England between Yorkshire and Kent and has a complex geology; nowhere else in Britain has a chalk landscape been so extensively modified by glaciations. These have given rise to some of its most striking features including numerous steep-sided and open-ended combes (valley systems). The Lincolnshire Wolds - A Special Landscape Lincolnshire Wolds AONB Management Plan 14 ([Link](#))
- **A scenic, working landscape** – The high scenic quality of the Wolds depends almost entirely upon the area's use for agriculture. Much of its charm is derived from the seasonally changing field and cropping patterns; the rural scenes of farming activity; and the traditional villages and farmsteads in brick and pantile. Overall, approximately 76% of the AONB is in arable cultivation, with 14.5% as pasture or rough grazing and 5.4% woodland cover (Defra Agricultural Census 2013 & Forestry Commission stats, 2015). It is widely recognised that much of the attractiveness of the Wolds today is a result of the activities of generations of landowners and farmers.
- **A major archaeological resource** – The Wolds has a rich legacy of prehistoric sites and a wealth of historic landscape features. Most of Lincolnshire's long barrows are

in the Wolds, with a high concentration of round barrows, together with many important ancient trackways including the ridge-top routes of the Bluestone Heath Road and the Caistor High Street. The Wolds also has one of the largest densities of deserted and shrunken medieval villages (DMVs and SMVs) in the country.

- **A valued cultural landscape** – The Wolds' landscape has been a source of cultural inspiration. The Tennyson family has a strong association with the area. Alfred, Lord Tennyson - the Poet Laureate - spent much of his formative years in the Wolds and it is featured in many of his works including 'The Brook'. The landscape has offered inspiration to many artists and writers over the years including the mid-19th century landscape painter Peter de Wint and more recently the author A. S. Byatt in the Booker Prize-winning novel 'Possession'.

Prospective Lincolnshire Heritage Coast

Natural England and the local planning authority have ambitions for a Lincolnshire Heritage Coast, However, planning for this is still at a very early stage so we cannot provide any certainty about the geographical extent of a finally defined Heritage Coast or about the specific special characteristics that it would seek to protect and how it would be served by local planning policies. Whilst a fully defined Heritage Coast is supported by planning policy in paragraph 178 of the National Planning Policy Framework, a speculative Heritage Coast confers no additional planning protection. Subject to progression we advise appropriate consideration may need to be given to a prospective Heritage Coast in progressing plans and assessing their landscape and seascape effects.

If more definitive information about the Heritage Coast emerges in time to further inform our response, it will be shared.

Lincs Node

As part of the Offshore Transmission Network Review (OTNR) a new national grid substation is proposed to be located on the edge of the LW AONB, known as 'Lincs Node'. In order to transmit electricity across the grid to Lincs Node, a new 400kv power line running the length of Lincolnshire that would connect to the existing grid from Grimsby in the North to Walpole in Norfolk is required. A distance of at least 70 miles which passes either directly through the LW AONB or the settings thereof. and impacts on functionally linked land to designated nature conservation sites.

Outer Dowsing Offshore Windfarm (ODOW) is the first of the marine energy generation projects currently considering a grid connection at Lincs Node. Each individual project will require its own substation before connecting to Lincs Node unless a cross-scheme strategic

approach is possible to enable shared facilities. Due to technical constraints associated with existing infrastructure and designated sites in the vicinity, there are limited viable landfall locations for marine sustainable development projects to connect to. Currently landfall is focused around Anderby Creek, which, in itself, has nature conservation implications.

In addition, because of existing infrastructure and environmental conditions, there are also other marine/coastal industries which currently have an interest in locating in this area of the Lincolnshire coast. These industries include but are not limited to, carbon capture and underground storage, hydrogen and nuclear. It is probable that not only will these industries utilise existing infrastructure, but that new infrastructure will also be required for any plans/projects brought forward for application, which will undoubtedly have an additional cumulative impact on sites designated for nature conservation as well as the settings of the AONB.

Whilst there are currently limited project specific details, based on our experience from other projects and due to the location of the developing Energy Hub (which includes the Lincs Node) on low lying land near to the coast, it is highly likely for there to be a requirement for any infrastructure to be 'housed' within new c.20m high buildings on elevated ground to address coastal conditions and mitigate flood risk. There is also likely to be increased traffic and transport within the more remote areas of Lincolnshire and its coast, which could also impact on the settings and special qualities of the LW AONB and Heritage coast.

Timeframes

The Lincs Node and any associated plans to connect it to the existing grid are at a very early stage in the planning process and the formal consultation process/es with interested parties are yet to commence. However, experience from similar schemes is that the totality of the pre-application, consenting and construction phases is between 6 and 10 years. It should also be noted that these projects were less complex than Lincs Node and proposed extension of the 400kv may be. There were also minimal challenges and/or requirements for mitigation and compensation to overcome for those projects.

We note that for all commercial enterprises a high degree of certainty is required. We assume that there will be a requirement for assurances that the Lincs Node project will not only be consented, but sufficiently constructed prior to the energy projects becoming operational. Whilst we recognise that the Lincs Node is designed to help facilitate meeting the Government's 2030 Green energy and current offshore windfarm delivery targets; we query if this is achievable within the current planning timeframes. The project will also need to allow for due processes to be followed including the necessary stakeholder engagement

on this high risk and complex project. Both Natural England (as the statutory consultee) and the LW AONB partnership (as a non statutory consultee with detailed local knowledge) would seek to be involved in the pre application stage of Lincs Node and the proposed connection between Grimsby and Walpole.

We note that with uncertainty around grid connection at the Lincs Node, ODOW is also exploring within their consultation under Section 42 of the Planning Act 2008 an alternative grid connection with a cable route extending south from Wolla Bank (on the Lincs Coast) to the existing Weston Marsh substation. While avoiding the requirement to connect to Lincs Node, the alternative cable route has similar LW AONB setting implications and environmental implications.

Impacts to the LW AONB

As interested parties, we wish to outline our collective concern in relation to the reliance for energy transmission via a new connection between Grimsby and Walpole and the Lincs Node, and the resulting impact these developments could have on the LW AONB and Heritage coast.

Crossing through the LW AONB and impacting the settings thereof represents a significant challenge in the context of avoiding or reducing significant adverse impacts to the special qualities of the LW AONB: notably to the landscape character (scenic beauty and rural charm, expansive sweeping views, peace and tranquillity), Earth Heritage (chalk upland, geological and glacial) features and archaeology (deserted medieval villages, burial mounds and monuments) special qualities of the Lincolnshire Wolds AONB.

The 2018 to 2023 management plan for Lincolnshire Wolds AONB (The Lincolnshire Wolds Countryside Service, 2018) states specifically within its description of pressures and threats to the special quality of ‘*Expansive Sweeping Views*’ that there is “*particular potential threat from hilltop or skyline developments including overhead powerlines*”.

We note that for other projects impacting on designated landscapes the National Grid have avoided areas of high amenity value, such as AONBs, in their adoption of the ‘Holford Rules’ for undergrounding of new high voltage overhead transmission lines. But this has delivery timeframe implications and still requires considerable stakeholder engagement. And whilst we would expect similar mitigation measures to be implemented for any proposed connections to the existing grid, this doesn’t mitigate for the potential changes to the settings and special qualities of the LW AONB and the defining characteristics of a new Heritage Coast from the construction of Lincs Node, the energy hub and associated infrastructure

within a part of Lincolnshire which primarily consists of rural communities and low-lying arable farming and grazing practices.

Whilst we advise that every effort should be made to minimise designated landscape impacts, there remains a risk this will not be sufficient to avoid adverse impacts on special qualities of the LW AONB.

Strategic Planning
Norfolk County Council
County Hall
Martineu Lane
Norwich
NR1 2DH

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

Your ref: EN0210010
www.norfolk.gov.uk
Email: NSIPs@norfolk.gov.uk

Date: 30 September 2025

By email: EasternGreenLink5@planninginspectorate.gov.uk

Dear ██████████

Eastern Green Link 5 Scoping Consultation

1 Introduction

- 1.1 Norfolk County Council ("NCC") is a consultation body for the purposes of the scoping consultation for Eastern Green Link 5 ("EGL5") by virtue of being an upper-tier local authority sharing a boundary with an upper-tier local authority in whose area the land to which the application relates is located, as set out in section 43(2A) of the Planning Act 2008 ("the 2008 Act").
- 1.2 On most environmental issues relating to EGL5, NCC would defer to Lincolnshire County Council ("LCC"), being the upper-tier local authority in whose area the project is located. Nevertheless, NCC would like to raise a limited number of points which have potential to affect a broader geography.

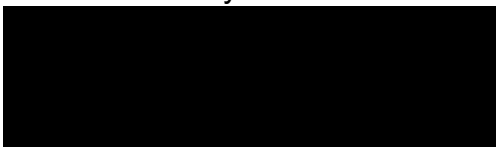
2 Cumulative Impacts

- 2.1 While EGL5 does not have a physical footprint within Norfolk, it is functionally and geographically related to the Eastern Green Links 3 & 4 project and the Grimsby to Walpole transmission project, both of which do directly affect the county. NCC requests that the Environmental Statement ("ES") for EGL5 includes an assessment of cumulative impacts in combination with these related projects. This should consider potential indirect or spillover effects that may arise within Norfolk, particularly where shared corridors, construction programmes, or operational interactions could give rise to combined environmental effects.

3 Employment and Skills

- 3.1 Any ES for the project should cover the impacts of the project on the regional labour market cumulatively with other major infrastructure projects including, but not limited to, other National Grid transmission projects which are part of the Great Grid Upgrade programme.
- 3.2 Norfolk is not in the same statistical region as Lincolnshire, but it is a neighbouring county affected by similar pressures on the labour market, particularly in relation to energy infrastructure projects. NCC would therefore request that employment and skills impacts of this project on Norfolk are considered in addition to the region in which the project is located.
- 3.3 Without prejudice to the findings of the ES, NCC would recommend the inclusion of an Employment and Skills Plan (“ESP”), compliance with which should be secured by the DCO, as part of any application. A formal ESP, with defined outputs, is essential and proportionate given the scale of investment, duration of construction, and level of regional impact expected to be associated with this delivering this nationally significant infrastructure project.

Yours sincerely



 MRTPI
NSIP Team Leader

Copy to: Lincolnshire County Council

From: [REDACTED]
To: [Eastern Green Link 5](#)
Subject: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification
Date: 30 September 2025 16:57:23

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Dear Sir/Madam,

Thank you for consulting Nottinghamshire CC on the above project, we have no comments to make at this stage of the process.

Regards

[REDACTED]
Principal Planner (Policy)



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Letter Number: PP1-ODOW-DEV-CS-LET-0053
Date: 26-09-2025

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

By email only:
EasternGreenLink5@planninginspectorate.gov.uk

Dear Sir/Madam,

Subject: Eastern Green Link 5 (EGL5) – Response to Environmental Impact Assessment Scoping Report

Outer Dowsing Offshore Wind (ODOW) is a proposed 1.5GW offshore windfarm, 33 miles from the Lincolnshire coast with the capacity to power over 1.6 million households, playing a critical role in achieving the UK Government's Clean Power 2030 target. ODOW is being developed by GT R4 Limited, trading as Outer Dowsing Offshore Wind, a joint venture of TotalEnergies, Corio Generation (and affiliates) and Gulf Energy. The Project completed Examination on 10th April 2025 and expects a Development Consent Order (DCO) decision on, or before, 10th October 2025.

Offshore Matters

It is noted that the proposed offshore route of EGL5 passes through the ODOW Order Limits. ODOW is in active dialogue with EGL5 in relation to co-existence between the two projects and will continue to pro-actively engage with the EGL5 team.

It is noted that the English Offshore Scheme Scoping Boundary and Other Marine Users Study Area (as set out in Volume 3, Figure 25-1) overlaps with the ODOW offshore export cable corridor. Chapter 25 of Volume 1: Main Text, Environmental Impact Assessment Scoping Report (EGL5-NGET-CONS-XX-RP-YL-006) sets out the approach to the assessment of the potential impacts from the construction, operation, maintenance and decommissioning of EGL5 on other marine users. However, this chapter does not appear to accurately represent known projects in the planning stage such as ODOW. It is requested that all offshore elements of ODOW are assessed appropriately within the forthcoming EGL5 Environmental Statement in relation to the

potential environmental impacts (and consideration of appropriate mitigation measures) of EGL5 on ODOW, and to ensure ODOW is accurately accounted for in the cumulative effects assessment.

Onshore Matters

ODOW have reviewed the EGL 5 Figure 1-2 English Onshore Scheme Scoping Boundary presented in Volume 3: Figures Environmental Impact Assessment Scoping Report (Document Reference: EGL5-NGET-CONS-XX-RP-YL-006). There are no direct overlaps of the EGL 5 study area presented in Figure 1-2 with the ODOW Order Limits, as the EGL 5 project makes landfall north of Anderby Creek, whereas ODOW makes landfall to the south of Anderby Creek.

Although there will be no direct onshore interactions of order limits, the potential for impacts from factors such as construction traffic routes (if the construction of the projects were to take place concurrently) should be carefully considered as part of the CEA undertaken. The ODOW Examination library documents are available on the Planning Inspectorate Website

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130>.

Through effective bilateral engagement and dialogue as members of the South and East Lincolnshire Linear Energy Projects Forum (SELLEPF), ODOW are keen to explore opportunities for collaboration and coordination with other developers in the area including EGL5, with a goal to help minimise impacts where possible, and to maximise the opportunities and benefits for local communities.

Cumulative Effects

As stated in Section 30, Cumulative Effects of the Scoping Report, EGL 5 will undertake a full Cumulative Effects Assessment (CEA) which will examine the result from the combined impacts of the Project with other developments on the same single receptor or resource as required under Paragraph 5 of Schedule 4 of the EIA Regulations and the interaction of environmental aspect effects occurring as a result of the Project in accordance with Regulation 5(2). ODOW wishes to ensure that the assessment of the EGL 5 project fully appreciates and accounts for the existence of the proposed onshore and offshore aspects of the ODOW project and the assessment of environmental impacts that has been undertaken to date for the ODOW project.

If you require any further information, please do not hesitate to contact me.

Yours faithfully



Consent Delivery Lead

From: [REDACTED]
To: [Eastern Green Link 5](#)
Cc: [REDACTED]
Subject: RE: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification
Date: 30 September 2025 15:01:58
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[EGL5 Letter to stat cons Scoping & Reg 11 Notification.pdf](#)

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Good afternoon [REDACTED]

I can confirm that Trinity House is content with the Scoping Report and has no further comments to make.

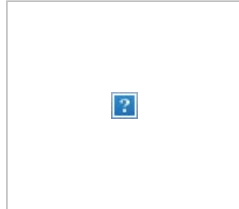
Kind regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED]@trinityhouse.co.uk | [REDACTED]

www.trinityhouse.co.uk



From: Eastern Green Link 5 <EasternGreenLink5@planninginspectorate.gov.uk>

Sent: 02 September 2025 15:15

To: Navigation <navigation.directorate@trinityhouse.co.uk>

Cc: [REDACTED]@trinityhouse.co.uk>

Subject: EN0210010 Eastern Green Link 5 - EIA Scoping Consultation and Regulation 11 Notification

Dear Sir/ Madam

Please see attached correspondence on the proposed Eastern Green Link 5 project.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a 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 its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **Tuesday 30 September 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED]
Senior Environmental Advisor

Planning Inspectorate

T [REDACTED]

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DPC:76616c646f72





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: EN0210010
Our Ref: 93528CIRIS

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

26th September 2025

Dear ██████████

Nationally Significant Infrastructure Project EN0210010 Eastern Green Link 5 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 recognise the promoters' proposal to include a health section. 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 Environmental Statement (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.

For potential EMF health impacts, UKHSA requests clarification as to whether the proposed project includes HVAC underground cables. If HVAC cables are part of the proposed development, then a statement should be provided explaining why EMFs can be scoped out for HVAC, as opposed to HVDC lines.

Please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>

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>

More information is available in the following advice document produced by Public Health England, a UKHSA predecessor body:

<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>

Recommendation

We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.



Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Telephone 01427 676676
Web www.west-lindsey.gov.uk

Planning.customer.care@west-lindsey.gov.uk

Date: 05/09/2025

Dear Sir/Madam

Application Number: WL/2025/00890

Proposal: PINS consultation on behalf of the Secretary of State for its opinion (a scoping Opinion) as to the information to be provided in an Environmental Statement - EN210010

Location: Eastern Green Link 5 project

Thank you for consulting West Lindsey District Council on the information to be provided in an Environmental Statement for the Eastern Green Link 5 project.

I can confirm that West Lindsey District Council do not have any comments to make on the information to be provided in the Environmental Statement.

Yours faithfully

[Redacted signature]

Senior Development Management Officer
On behalf of West Lindsey District Council

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email customer.services@west-lindsey.gov.uk or by asking any of the Customer Services staff.

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