

The Great Grid Upgrade

Sea Link

Preliminary Environmental Information Report

Volume: 1

Part 1 Introduction

Chapter 6 Scoping Opinion and EIA Consultation

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nationalgrid

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1.6 Scoping Opinion and EIA Consultation

1.6.1 EIA Scoping

- 1.6.1.1 The process of scoping helps to ensure that the topics covered, the baseline information used, and the methods of the assessment, are appropriate, and have taken into account the views of consultees and decision makers where appropriate.
- 1.6.1.2 There are two main stages in the scoping process. Firstly, the applicant supplies information to inform a view as to the scope of issues that should be covered in the main Environmental Statement (ES); this usually takes the form of a Scoping Report and is based on initial consultation, data searches and baseline surveys, as appropriate. The second stage in the scoping process is for the Secretary of State (SoS) to issue a Scoping Opinion, outlining what they expect to be covered in the ES, having consulted a range of statutory bodies, and taken into account the information provided by the applicant in their Scoping Report.

1.6.2 Scoping Report

- 1.6.2.1 The first stage of the scoping exercise culminates in the preparation of a 'Scoping Report' by the applicant. The Scoping Report covers the topics to be assessed, the study areas under consideration and the methods for assessing potential effects, including the methods used for defining the baseline situation.
- 1.6.2.2 The Scoping Report (Ref 1.0.1) for the Proposed Project submitted on 24 October 2022 supported a request by National Grid Electricity Transmission plc (National Grid), under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as 'the EIA Regulations') and with due regard to the Planning Inspectorate Advice Note Seven (Ref 1.0.2), for a written Scoping Opinion from the SoS, administered by the Planning Inspectorate on behalf of the SoS, to inform the EIA for the Proposed Project.

1.6.3 Scoping Opinion

- 1.6.3.1 A Scoping Opinion (Ref 1.0.3) was received from the Planning Inspectorate on behalf of the SoS on 1 December 2022. The Scoping Opinion takes account of responses from prescribed consultation bodies¹, relevant statutory undertakers², Local Authorities³, and non-prescribed consultation bodies as appropriate.

¹ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

² 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

³ As defined in Section 43(3) of the PA2008

- 1.6.3.2 In each of the technical chapters in this Preliminary Environmental Information Report (PEIR) in Parts 2 – 5 a table is provided. It includes extracts from the Scoping Opinion that relate specifically to each technical chapter and information is provided to explain how and where the issue is addressed in the PEIR or will be addressed in the Environmental Statement.
- 1.6.3.3 Table 1.6.1 below provides responses and overarching comments in the Scoping Opinion.

Table 1.6.1: Comments raised in the Scoping Opinion

ID	Inspectorate’s comments	Response
2.1.1	<p>Co-ordination of projects – cumulative effects</p> <p>The Inspectorate encourages the Applicant to make effort to coordinate the delivery of the Proposed Development with other relevant developments in the area. This may include sharing infrastructure requirements e.g. converter stations and/or cabling, where possible in an effort to reduce the cumulative impacts and significant effects.</p>	<p>National Grid and National Grid Ventures (NGV) have explored the opportunities for coordination and co-location of their proposed projects in Suffolk, one part of which is co-location of infrastructure.</p> <p>Volume 1, Part 1, Chapter 4, Description of the Proposed Project, outlines how co-location has been taken into account within the Proposed Project and Volume 1, Part 1, Chapter 5, PEIR Approach and Methodology explains how co-location is assessed in the technical chapters in Parts 2-5.</p> <p>National Grid and NGV will continue to explore opportunities for coordination and co-location in the development of their respective projects.</p>
2.1.2	<p>Friston substation</p> <p>The Scoping Report contains a limited description of the likely parameters for the works at Friston substation. The ES should clearly set out the worst-case parameters for the assessment, in particular in relation to landscape and visual impacts.</p>	<p>A description of the parameters for Friston substation is set out in Volume 1, Part 1, Chapter 4, Description of the Proposed Project. How the parameters have been assessed in relation to each technical chapter are set out at section 5 (Basis of Assessment) of each of the technical chapters in Parts 1-</p>

ID	Inspectorate's comments	Response
2.1.3	<p>Offshore High Voltage Direct Current (HVDC) cable</p> <p>Noting the statement that the offshore cable system is still under development at this stage, the ES should clearly set out the parameters for the offshore HVDC cabling system that have been applied for in the assessment.</p>	<p>5. Volume 1, Part 2, Chapter 2, Landscape and Visual sets out the basis of assessment in relation to landscape and visual impacts</p>
2.1.4	<p>Construction programme - converter stations</p> <p>The Scoping Report states construction of the converter stations would take ‘...between 27 months.’ It is unclear if this is intended to be a range or an approximation. The construction programme for the Proposed Development is also not consistent between chapters of the Scoping Report. The ES should clearly state the anticipated construction programme used for the assessment and ensure aspect chapters are consistent in this regard.</p>	<p>An indicative construction programme is presented in Volume 1, Part 1, Chapter 4, Description of the Proposed Project. This has been used in the assessments presented in the technical chapters of Parts 2-5 whilst also applying a sensitivity test as to the implementation of consent as explained in Volume 1, Part 1, Chapter 5, PEIR Approach and Methodology</p>
2.1.5	<p>Overhead High Voltage Alternating Current (HVAC) Connection – pylon foundations</p> <p>It is unclear whether the final choice of pylon foundation would be made prior to the Development Consent Order (DCO) application or whether flexibility is to be sought. The ES should clearly state the assumptions made with regards to foundation type.</p>	<p>An explanation of different foundation types that could be used is presented in Volume 1, Part 1, Chapter 4, Description of the Proposed Project. The type used will depend on the ground conditions where the pylon is located. As the exact locations of the pylons would be subject to a Limit of Deviation (LoD) it is proposed to include flexibility within the application so the most suitable type can be selected for each location. The technical chapters in Parts 1-5 have applied a worst-case assessment in relation to foundation types.</p>

ID	Inspectorate's comments	Response
2.1.6	<p>Onshore cable installation – crossings</p> <p>As the landfall and onshore route is still being defined, it is not yet clear where any temporary or permanent crossings of watercourses, major roads and/or railways would be required. The ES should identify the locations and types of all such crossings. The Applicant should also seek to agree the depths of any trenchless crossings (such as Horizontal Directional Drilling (HDD)) to be undertaken below obstacles such as watercourses and flood defences with the relevant consultation bodies, including the Environment Agency (EA) and Internal Drainage Boards (IDBs), as appropriate. The ES should also provide detail of protocols/measures to be put in place to prevent break outs or frack-outs of bentonite from occurring or to minimise impacts should such events occur.</p>	<p>Volume 2, Part 1, Appendix 1.4.D, Crossings Schedule provides details of each of the proposed crossings for watercourses, roads, railways, cycleways, and Public Rights of Way (PRoW). This includes the location of the crossing, what the crossing comprises of (e.g. cable or access road) and any commitments made in relation to crossing technique such as trenchless or the use of a bridge.</p> <p>Stakeholder engagement with the MMO and NE is ongoing, as appropriate, in relation to the depths of crossings.</p> <p>Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice sets out measures for control of break outs and frack outs.</p>
2.1.7	<p>Vessel movements</p> <p>The ES should detail the type, number and frequency of vessel movements required to construct and operate the Proposed Development. If these are unknown, then the ES should explain the assumptions that have been made about vessel movements to inform the worst case assessment.</p>	<p>Information on the types of likely vessel required to install the marine cable are provided in Volume 1, Part 1, Chapter 4, Description of the Proposed Project.</p> <p>These have been taken into account in the technical chapters in Part 4.</p>
2.1.8	<p>Operation and maintenance</p> <p>The ES should provide a full description of the nature and scope of operation and maintenance activities, including types of activity, frequency, and how works will be carried out for both offshore and onshore elements of the Proposed Development. This should include consideration of potential overlapping of activities with the coordinated projects (where applicable) and other consented projects such as the East Anglia Offshore Windfarms One North/Two and Sizewell C Nuclear Power Station, where possible.</p>	<p>Volume 1, Part 1, Chapter 4, Description of the Proposed Project provides a description of operation and maintenance for the Proposed Project.</p>

ID	Inspectorate's comments	Response
2.1.9	<p>Decommissioning of marine cable</p> <p>The Scoping Report states that marine cables may either be removed or left in-situ, in the event that the Proposed Development is decommissioned. The Inspectorate notes that a decommissioning plan will be prepared post-consent and updated across the lifetime of the development. However, in order to ensure that all likely significant effects associated with the Proposed Development are included in the ES, the ES should include an assessment of decommissioning effects based on a reasonable worst-case scenario.</p>	<p>Parts 2-5 provide an assessment of decommissioning where this has been scoped in within each technical chapter.</p>
2.1.10	<p>Impacts to utilities</p> <p>The Scoping Report states that trenchless methods will be used where utilities are required to be crossed by the Proposed Development. For clarity, the embedded measures/design should first consider avoidance of such infrastructure (where possible), then consider trenchless techniques. This should include potential impacts to wastewater infrastructure, which has not been identified as a utility consideration in the Scoping Report</p>	<p>Utilities have been sought to be avoided where possible. Where avoidance has not been possible the Proposed Project will continue to engage with those asset owners to agree appropriate crossing methodologies.</p>
2.2.1	<p>Intra-project assessment methodology</p> <p>The Inspectorate queries whether the yes/no arrows in this flowchart image are correct. For example, where a receptor 'is impacted by more than one type of effect' at stage 1 pre-screening stage, whether it should be carried forward to the stage 2 screening stage. The ES should clarify the approach.</p>	<p>The flowchart image now found in Volume 2, Part 1, Appendix 1.5.A, Cumulative Effects Assessment Methodologies has been amended to correct this error.</p>
2.2.2	<p>Definition of significance</p> <p>Whilst it is noted that Section 1.5 sets out the overarching approach to be taken when determining the significance of effects, the phraseology used in Table 1.5.1 is not applied consistently throughout the Scoping Report. The ES should apply such phraseology consistently, where aspect assessments depart from this approach it should be</p>	<p>This has been reviewed and reflected across all of the technical chapters in Parts 2-5. Where there is a specific reason to deviate from this terminology due to specific topic guidance, justification is provided within that relevant technical chapter.</p>

ID	Inspectorate's comments	Response
	clearly stated and provide reasons for the approach.	
2.2.3	<p>Figures</p> <p>There are a number of Figures where the legends/keys make it difficult to distinguish varying features. For example, Figure 2.2.3 contains two hatchings of very similar colour, thus making it difficult to distinguish between the regional Landscape Character Types 0 and 16. Figure 2.11.1 is missing the legend/key and the Conservation Areas of Aldeburgh, Thorpeness, Leiston, and Saxmundham are not apparent on Figure 2.4.1, despite being included in the legend/key. The ES should include clearly labelled figures with a clear legend/key to enable interpretation of the information.</p>	This has been taken into account in the production of the Figures contained in Volume 3.

1.6.4 Stakeholder Meetings

- 1.6.4.1 In addition to the formal scoping process National Grid has undertaken ongoing stakeholder engagement throughout the evolution of the Proposed Project. This has included:
- Regular liaison with the relevant Local Authorities and the Marine Management Organisation (MMO), including strategic and topic specific meetings. The relevant local authorities have also been consulted on the draft Statement of Community Consultation (SOCC);
 - Meeting with statutory stakeholders such as the Environment Agency, Historic England and Natural England, and non-statutory stakeholders such as the RSPB and Port and Harbour Authorities, to update them on the Proposed Project, discuss technical issues and respond to questions.
- 1.6.4.2 Where feedback of relevance to the EIA has been provided through these engagements, this has been considered and reflected where appropriate.
- 1.6.4.3 As part of the meetings and workshops with statutory stakeholders, topic meetings and thematic groups have been held to discuss EIA methodologies, survey requirements, and the baseline environment. These are described in more detail below.
- 1.6.4.4 The stakeholder meetings represented a means of consultation prior to statutory consultation. Where relevant the specifics of these meetings are referred to within each of the technical chapters. Table 1.6.2 Lists the meetings which have been held for each topic, the attendees and the matters discussed.

Table 1.6.2: Stakeholder meetings relevant to the PEIR

Relevant PEIR Chapter	Meeting Date	Attendees	Matters Discussed
Terrestrial			
Landscape and Visual	10/05/23	Dover District Council Thanet District Council	An update on the Proposed Project and discussion on the proposed study area and justification for the selection of the proposed viewpoint locations. High level discussion on the proposed landscape mitigation strategy
	24/05/23	Suffolk County Council East Suffolk Council Natural England	An update on the Proposed Project and discussion on the proposed study area and justification for the selection of the proposed viewpoint locations. Discussed the approach to Landscape and Visual Impact Assessment (LVIA) High level discussion on the proposed landscape mitigation strategy
	29/06/23	AONB Partnership Natural England	Proposed Project update and discussion as to the proposed assessment approach on the Area of Outstanding Beauty (AONB)
	20/01/23	Kent County Council Historic England	Site meeting to discuss Proposed Project Discussed site setting impacts
Historic Environment	04/05/23	Historic England	General update on the Proposed Project: <ul style="list-style-type: none"> • Surveys, • SSSI Assents for ground investigation work • Potential co-location with NGV

Relevant PEIR Chapter	Meeting Date	Attendees	Matters Discussed
			<ul style="list-style-type: none"> • Scoping Opinion responses review • Marine Archaeology
	15/05/23	Kent Council Kent County Archaeologist Historic England	Approach to the proposed geophysical survey.
	15/06/23	Suffolk County Council Historic England	Meeting to discuss the proposed approach to the assessment of both physical impacts and setting effects and agree any heritage specific viewpoints.
	19/09/23	Suffolk County Council Archaeology Officer	Meeting to discuss Proposed Project, ongoing surveys and further archaeological works.
	06/10/23	Historic England Suffolk Council East Suffolk Council	Meeting to discuss built heritage.
Traffic and Transport	12/04/23	Kent County Council (KCC)	Presentation with councils to discuss the key parameters for the PEIR assessment: <ul style="list-style-type: none"> • Agreed the traffic study area, peak hours for assessments, • Agreed method for distributing construction traffic for local highway network (including assignment of Heavy Goods Vehicle (HGV) trips and Abnormal Indivisible Load (AIL)) • Presentation to KCC of feedback from the Planning Inspectorate of Scoping Opinion • Agreed appropriate deliverables, such as: <ul style="list-style-type: none"> – Incorporating the Transport Assessment into the PEIR.
	09/6/23	Suffolk County Council	

Relevant PEIR Chapter	Meeting Date	Attendees	Matters Discussed
			<ul style="list-style-type: none"> – To provide an Outline Construction Traffic Management Plan (CTMP) and draft a PRoW Management Plan (Prepared during ES Stage) <p>Discussion of the proposed other developments to be included in the inter-project cumulative effects assessment.</p> <p>Discussion on the suitability of proposed access points</p>
Noise and Vibration	27/04/23	Thanet District Council Dover District Council	Meeting to discuss noise assessment methodology and noise survey locations
	28/04/23	East Suffolk District Council Suffolk County Council	Meeting to discuss noise assessment methodology and noise survey locations
Socio-Economics and Tourism	19/06/23	Kent County Council	Presentation of socio-economics, recreation and tourism methodology and baseline.
	10/08/23	Kent County Council	Presentation on high level overview, scoping opinion, methodology, data sources for the baseline and receptors
	09/08/23	Suffolk County Council East Suffolk District Council Suffolk County Council	
Health and Wellbeing	16/10/23	Kent County Council Thanet District Council Suffolk County Council	Discussion regarding Proposed Project overview, methodology and baseline.

Relevant PEIR Chapter	Meeting Date	Attendees	Matters Discussed
		East Suffolk District Council Suffolk County Council	
Marine			
Fish and Shellfish	31/05/23	MMO Natural England CEFAS	Meeting to discuss Fish and Shellfish Scoping Opinion comments raised and provide and update on the Proposed Project. Key areas of discussion were focussed on the Proposed Projects approach to the Herring and Sandeel assessment.
Benthic Ecology	12/05/23	MMO Natural England Cefas	Meeting to discuss Benthic Ecology Scoping Opinion comments raised and provide and update on the Proposed Project. Key discussion focused on the scoping in/out of Electro Magnetic Fields (EMF) and underwater noise on benthic invertebrates.
Marine Mammals	9/05/23	MMO Natural England Cefas	Meeting to discuss Marine Mammals Scoping Opinion and comments raised and provide and update on the Proposed Project. Key discussion focused on the screening of designated sites and the inclusion of Unexploded Ordnance (UXO) in assessments.
Shipping and Navigation	24/04/23	MCA Trinity House	Meeting to discuss Shipping and Navigation Scoping Opinion comments, provide and update on the Proposed Project and key navigational features in the vicinity of the Proposed Project which will be relevant to the Navigational Risk Assessment (NRA).
	28/04/23	Port Authorities	Meeting to discuss Shipping and Navigation Scoping Opinion comments, provide and update

Relevant PEIR Chapter	Meeting Date	Attendees	Matters Discussed
			on the Proposed Project and key navigational features in the vicinity of the Project which will be relevant to the NRA.
Physical Environment	24/04/23	CEFAS MMO Natural England	Meeting to discuss Physical Environment Scoping Opinion comments raise and provide and update on the Proposed Project and provide and update on the Proposed Project. Discussion focused on clarifying the scoping in/out of impact pathways and data sources used.

1.6.5 References

Ref 1.0.1 National Grid Electricity Transmission plc Sea Link Scoping Report October 2022[online] Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020026/EN020026-000042-EN020026%20-%20Scoping%20Report%20-%20Volume%201%20-%20Part%201%20Introduction.pdf>.

Ref 1.0.2 Planning Inspectorates Advice Note, June 2020 (version 7) [online] Available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-and-environmental-statements/>.

Ref 1.0.3 Planning Inspectorate Scoping Opinion Proposed Sea Link December 2022 [online] Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020026/EN020026-000027-EN020026-Scoping-Opinion.pdf>.

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