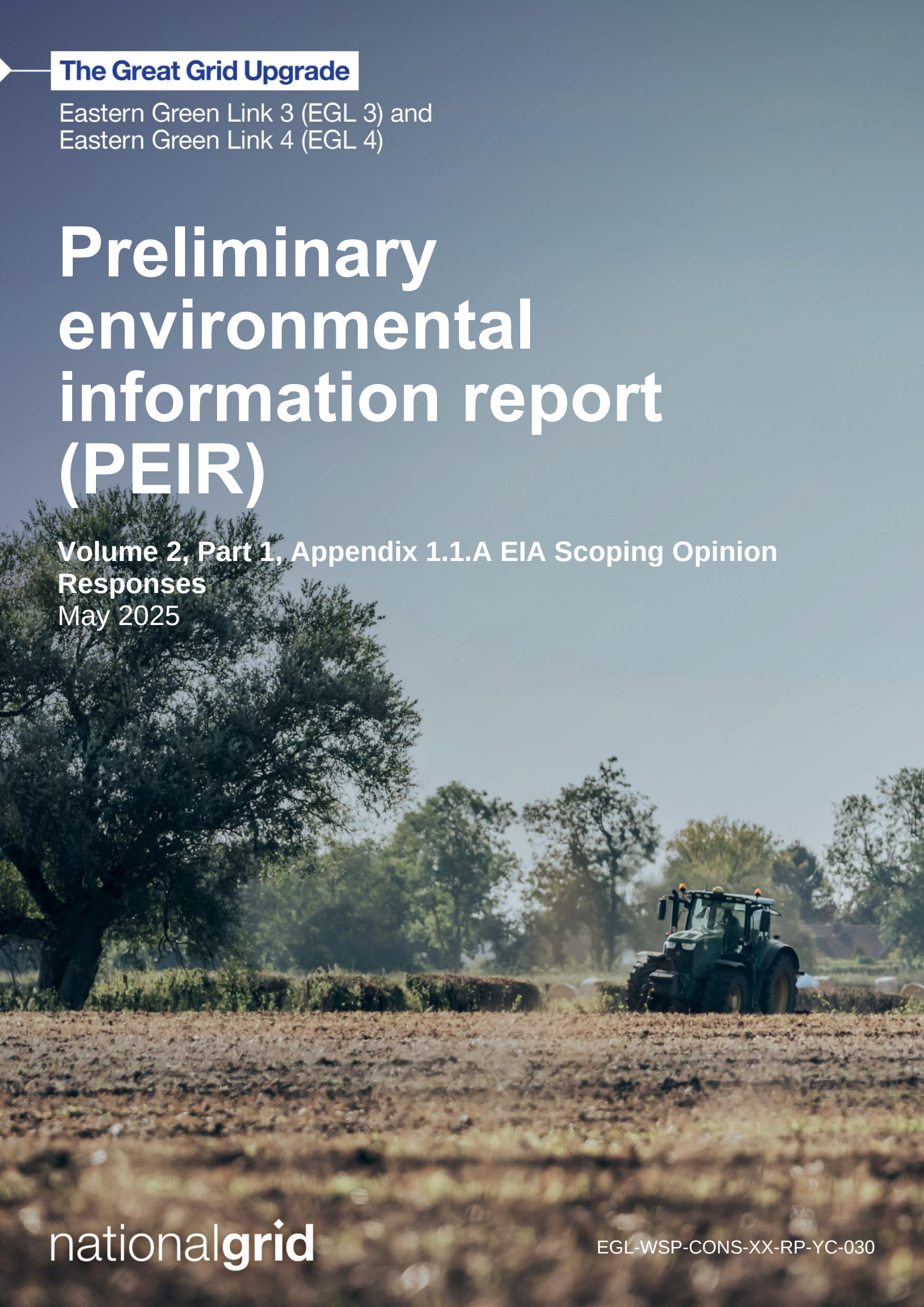
The Great Grid Upgrade

Eastern Green Link 3 (EGL 3) and
Eastern Green Link 4 (EGL 4)

Preliminary environmental information report (PEIR)

Volume 2, Part 1, Appendix 1.1.A EIA Scoping Opinion Responses

May 2025



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EGL-WSP-CONS-XX-RP-YC-030

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1.1.A.1 Scoping opinion responses

1.1.A.1.1 An EIA Scoping Opinion was adopted by the Secretary of State, administered by the Planning Inspectorate, on 05 September 2024, in response to the EIA Scoping Report. The information provided in the Preliminary Environmental Information Report (PEIR) is preliminary and not all of the Scoping Opinion comments have been addressed at this stage, however all comments will be addressed in the Environmental Statement (ES). **Table 1.1.A-1** provides a summary of the response in relation to EIA co-ordination and requirements, the description of the Projects, EIA methodology and scope of assessment. The aspect chapters (in **Volume 1, Part 2, Part 3** and **Part 4**) provide further responses to the Scoping Opinion.

Table 1.1.A-1 - Applicant's Preliminary response to the Planning Inspectorate's EIA Scoping Opinion comments

ID*	Planning Inspectorate comments	How addressed in this PEIR
1.0.4	The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.	Noted, no actioned required.
1.0.5	Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.	Noted, no actioned required.
1.0.6	The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, 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	Noted. The Applicant will consult with the advice notes, in particular AN7 during preparation of the ES.
1.0.7	Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from: https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes .	Noted. The Applicant will consult with the advice notes, in particular AN7 during preparation of the ES.

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1.0.8	This Opinion should not be construed as implying that the Inspectorate agrees with the information, or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.	Noted, no actioned required.
2.1.1	Terminology: The Proposed Development is described as a “2 gigawatt” link, however the Scoping Report does not make it clear how this is related to the voltage terminology which is utilised throughout the Scoping Report. The ES should provide a clear description of the technical terminology used.	The term ‘gigawatt’ and ‘voltage’ have been added to the glossary of the PEIR and will also be included in the glossary of the ES. The ‘wattage’ is the amount of electricity being used or produced and the ‘voltage’ is the force that pushes electrical charges through a conductor.
2.1.2	Location of converter stations: The Scoping Report states that the converter stations would be c. 5km away from the next required infrastructure (converter station or Walpole substation). The ES should provide an explanation as to why this infrastructure is separate from the Walpole substation (also see 2.1.6) below in relation to AC cables requiring an increased working width).	The location of the Walpole converter stations would be sited within 5 km of the Walpole B Substation. Where practical, the siting of the converter stations would be located as close to the Walpole B Substation as possible, subject to potential environmental impacts and engineering complexity. The reasonable alternative locations for the siting of the Walpole B Substation and converter stations to date are outlined in **Volume 1, Part 1, Chapter 3 Reasonable Alternatives Considered** of the PEIR. This information, and information as a result of

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		further siting works following the PEIR, will be provided in the ES.
2.1.3	Clarification: 'Supplementary works to the existing 400 kV may be required to enable a connection with the new Walpole substation', the ES should be clear as to whether these works are to be a component of the Proposed Development or how these would be secured. The ES should also consider the need to include these in the EIA as cumulative/in- combination development if necessary.	The works to the existing 400 kV overhead line form part of the English Onshore Scheme as described within **Volume 1, Part 1, Chapter 4: Description of the Projects** and as such, this will be assessed as part of the English Onshore Scheme in the ES.
2.1.4	Onshore building parameters: The Scoping Report describes the indicative footprint and maximum building heights for the proposed Walpole Substation and converter sites. The ES should clearly set out the worst-case parameters for the assessment, in particular in relation to landscape and visual effects.	The Applicant will seek to ensure that the components of the Projects are fixed, however, where this is not possible, the PEIR has, and the ES will, adopt what is termed a 'Rochdale Envelope' or parameter-based design envelope approach, having regard to the Planning Inspectorate's 'Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope', allowing for a realistic worst-case assessment to be undertaken.
2.1.5	Cable separation distances: The Scoping Report states that for the onshore scheme, each of EGL3 and 4 would require two cables for the DC section, and for the AC section; six cables. The ES should detail the separation distances between the two cables in order to determine the excavation width and detail the required distance between the trenches of EGL3 and EGL4, and any associated stand offs.	Each cable needs to be well-spaced from others for heat dissipation, to prevent overheating and subsequent reduction in its capacity for carrying current (cable rating). For the English Onshore Scheme, twelve HVAC cables are required in total i.e. two sets of three (totalling six AC cables) for the EGL 3 Project and two sets of three (totalling six AC cables) for the EGL 4 Project.

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		Comparatively, only four HVDC cables would be installed for the English Onshore Scheme, (two for the EGL 3 Project and two for the EGL 4 Project), therefore the working width is considerably reduced for the HVDC cable system. The ES will include this detail.
2.1.6	AC cable working width: The Inspectorate notes that the working width of Alternating Current (AC) cable installation is 130-140m, whereas the Direct Current (DC) cable working width is 70m. The ES should provide a justification for the working width is.	For the English Onshore Scheme, twelve HVAC cables are required in total i.e. two sets of three (totalling six AC cables) for the EGL 3 Project and two sets of three (totalling six AC cables) for the EGL 4 Project. Comparatively, only four HVDC cables would be installed for the English Onshore Scheme, (two for the EGL 3 Project and two for the EGL 4 Project), therefore the working width is considerably reduced for the HVDC cable system. The ES will include this detail.
2.1.7	Salt pollution from Air Insulated Switchgear (AIS) / Gas Insulated Switchgear (GIS): The Scoping Report refers to salt pollution in relation to the decision over whether Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS) is used. The Scoping Report does not refer to this elsewhere. Where salt pollution is considered a potential impact to sensitive receptors, this should be assessed within the relevant ES chapters.	The reference to salt pollution refers to the effect of potential salt pollution from the local environment upon the proposed electrical infrastructure as part of the English Onshore Scheme and therefore, will not be assessed in the ES.
2.1.8	Temporary construction compounds:	Noted. Descriptions of the temporary construction compounds and laydown areas,

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	The ES should describe the proposed number, location and parameters of temporary construction compounds and laydown areas required during construction and decommissioning of the Proposed Development. The ES should assess any likely significant effects arising from these works.	including their number, location and parameters, will be provided to support the assessment of effects relating to construction of the Projects within the ES.
2.1.9	Temporary access routes and construction vehicle movements: The Scoping Report states that temporary access roads and alterations to existing accesses from the public highway will be required. Temporary watercourse crossings (including culverts and bridges) may also be needed to facilitate the route. The ES should describe the location and parameters of temporary access routes, including any changes proposed to the existing highway, and confirm the predicted number/ type of traffic movements required. Where details are unknown, a worst-case scenario should be presented. Where crossing of watercourses and culverts are required, these should be discussed and agreed with the Environmental Agency.	The ES will provide a description of the potential access routes for the construction phase of the Projects. Where these cannot be accurately defined due to project maturity, the ES will present a worst-case scenario assessment. Crossings of watercourses and culverts will be discussed with the Environment Agency in the lead up to the ES and the outcomes of those discussions will be presented in the ES.
2.1.10	Use of acronyms: Consideration should be given to the applicability of acronyms as the number in use could hamper the readability of the documentation.	Noted. The use of acronyms has been taken into consideration for the PEIR, and where possible, these have been reduced, as it will also be for the ES.
2.2.1	Life span of the project: The Scoping Report is inconsistent in relation to its reference to decommissioning for example Paragraph 5.4.11 states that the design life of the Proposed Development is 40 years but will be extended where possible with an unspecified end date. Paragraph	The Projects are expected to operate for a minimum of 40 years; however, it is anticipated that after this date rather than be decommissioned, parts would be replaced to extend the operational life. The ES will be clear as to the lifespan of the Projects and

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	33.7.2 states that the life span of 60 year minimum. The ES should be clear as to the lifespan of the Proposed Development and components to inform the assessment in relation to maintenance and replacement.	what the requirements are in relation to maintenance and replacement.
2.2.2	Decommissioning: The Scoping Report is inconsistent in its reference to decommissioning assessment, for example paragraph 5.1.1 states that decommissioning will be assessed in the ES which paragraph 5.4.12 states that no decommissioning is to be scoped out. The ES needs to be clear as to the lifespan of the project and apply a consistent approach to the assessment of decommissioning.	It is anticipated that rather than the Projects be decommissioned, parts would be replaced to extend the operational life. As such, the operational assessments in the PEIR have been undertaken under the assumption that the Projects will continue to operate in perpetuity. For the English Onshore Scheme in particular, the environmental impact of decommissioning cannot be fully assessed until the environmental conditions at the time of decommissioning are established. Acknowledging the complexities of completing a detailed assessment for decommissioning works up to 40 years in the future for the English Onshore Scheme, and given that there are no current plans to decommission the Projects, an assessment of effects associated with decommissioning is not presented for the English Onshore Scheme in the PEIR, and will not be undertaken for the ES. Instead **Table 4-21** in **Volume 1, Part 1, Chapter 4 Description of the Projects** provides a high level summary assessment of the likely significant effects associated with decommissioning for each environmental aspect based on existing information. For the English Offshore Scheme, given the level of information available regarding the

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		approach to decommissioning, reasonable assumptions with regards to likely environmental impacts at the time of decommissioning can be made. As such, **Volume 1, Part 3, English Offshore Scheme** of the PEIR has considered impacts associated with decommissioning within the technical aspect chapters. This will also be included in the English Offshore Scheme ES chapters.
2.2.3	Study Area: Scoping Report Figure 3-4 shows the landfalls as being located outside the cable route study area. The ES should ensure the study areas are clearly explained and that the assessment includes the whole project should it be undertaken in sections (offshore, onshore and intertidal).	Noted, Figure 3-4 of the Scoping Report shows the cable study area for the English Onshore Scheme. The ES will ensure that all study areas are clearly explained for each aspect chapter as part of the Projects.
2.2.4	In-combination effects: Whilst the Scoping Report clearly lists in each aspect chapter, those aspects which interact, there is little discussion in relation to how the EIA will assess the in-combination effect of multiple effects on a receptor. The EIA should include such an assessment where appropriate.	The methodology for assessing potential in-combination effects is provided in **Volume 1, Part 4, Chapter 28: Cumulative Effects**. A detailed assessment of potential combined effects will be provided as part of the ES.
2.2.5	Phases of development: It is noted that the Scoping Report refers to operation in some chapters and operation and maintenance in others, the ES should be consistent to ensure that it is clear that the assessment is	The ES will ensure a clear distinction between operation and maintenance activities as part of the assessments presented in the aspect chapters.

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	robust. Activities expected to be undertaken within each phase should be clearly set out and assessed.	
2.2.6	Overview of data: The Inspectorate notes that each chapter presents the same figure as an “overview” of the Proposed Development when discussing baseline data. This figure shows the red line boundary of the Proposed Development. Whilst it is recognised that this provides the reader with this information without the need to reference the project description, the title of the figure is misleading. A figure specifical to that aspect showing features relevant to the baseline data would aid understanding further.	Noted. The ES will ensure that figures are specific to the aspects showing relevant baseline data.
2.2.7	Assessment of Alternatives - Option for the Lincolnshire Converter Station (LCS): Paragraph 3.4.5 of the Scoping Report refers to the LCS as being proposed by the Grimsby to Walpole project, however the Scoping Report project description refers to the LCS as being part of EGL 3 and 4 also. The ES should provide clarity on which elements are included within the Proposed Development only and which are in both applications, and which are related developments but outside the DCO [Development Consent Order] process. The ES should clearly set out how they have been assessed accordingly. The timings of construction of all components should be used to inform the assessment.	The Grimsby to Walpole Project proposes a Lincolnshire Connection Substation (LCS) and the EGL 3 and EGL 4 Project proposed a separate LCS converter station. However, since the submission of the Scoping Report, the EGL 3 and EGL 4 LCS converter station and associated infrastructure have been excluded from the English Onshore Scheme for statutory consultation. On this basis, the preliminary information within this PEIR does not provide further information on the LCS converter station and associated infrastructure, however, **Volume 1, Part 1, Chapter 3: Reasonable Alternatives Considered** outlines how the removal of these have influenced the design evolution of the English Onshore Scheme. For the reasons outlined above, assessment of the LCS converter station and associated infrastructure will not be included in the ES as

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		it no longer forms part of the English Onshore Scheme. The ES will set out which elements are a commonality to EGL 3, EGL 4 and the Grimsby to Walpole Project. As set out in **Volume 1, Part 1, Chapter 4: Description of the Projects**, the Walpole B Substation would serve as a common connection point for the Grimsby to Walpole Project, the EGL 3 Project and the EGL 4 Project. The need for the Walpole B Substation exists as a part of either EGL 3 and EGL 4 or the Grimsby to Walpole Project and therefore will form part of their respective DCOs.
2.2.8	Use of differing worst- case scenarios between 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 particular parameter may interact with the receptors being considered. The ES should provide details in each chapter of the worst-case parameters relevant to that chapter and provide a justification for why that represents the worst case for that chapter.	Noted. Each aspect chapter within the ES will include a section which outlines what the basis for assessment is for that particular aspect. This section will detail what the realistic worst-case parameters are in relation to the physical elements of the Projects. Where there is a need to make worst-case design assumptions for the assessment, for example, where there is uncertainty or optionality in the design, these will be set out in this section of the ES. Each aspect chapter within this PEIR includes a section titled 'Key parameters for assessment' which serves this same purpose.
2.2.9	Receptors identified: The ES should ensure that all receptors identified in aspect chapters are then clearly assessed unless these are subsequently scoped out with justification provided.	Noted. The ES will ensure that all receptors identified in aspect chapters are then clearly assessed unless these are subsequently scoped out with justification provided.

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2.2.10	Use of professional judgement: 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.	Noted. Where professional judgement has been utilised as part of an assessment, or to assign significance, clear justification will be provided for this within the ES.
2.2.11	Cumulative / in- combination effects between the "projects": The Scoping Report details, in section 1.4, that the whole development comprises 4 projects (English offshore and onshore, Scottish onshore and offshore). Where the ES assesses cumulative and in combination effects, the ES should consider the potential for these projects to be developed sequentially or concurrently and the potential for this to result in differing cumulative or in-combination effects dependent on the construction order. The ES should also clearly define whether it has considered EGL3 and EGL4 as being constructed separately or concurrently, and therefore whether they are considered as one or 2 projects.	As identified in **Volume 1, Part 1, Chapter 1: Introduction**, the Projects assessed as part of this PEIR include the English Onshore Scheme and the English Offshore Scheme. Where the construction crosses from one jurisdiction to the next e.g. English to Scottish waters, there will be a continuation of effects along the linear project. These effects will be limited in spatial extent in proximity to the jurisdictional boundary and are not considered to be significant. The potential for cumulative and combined effects will continue to be considered and where required, will be reported in the ES. As noted in **Volume 1, Part 1, Chapter 1: Introduction**, the EGL 3 Project and the EGL 4 Project are two separate projects, however they will be part of the same DCO application. For the purposes of the EIA and to allow for reasonable worst case construction scenario to be assessed, the EGL 3 Project and EGL 4 Project will be assessed together, and a

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		detailed assessment will be presented at the ES stage. In addition, it is recognised in **Volume 1, Part 1, Chapter 4: Description of the Projects**, the EGL 3 Project and EGL 4 Project have different construction contracts and therefore, there would be the potential for different construction timelines. However, there is no scenario where all elements for one project would be completed, followed by a period of inactivity and then commencement of construction for the other project. Construction programmes will continue to be reviewed and will be reported as appropriate in the ES.
2.2.12	Standardisation of onshore and offshore methodology: The Inspectorate notes that there are some differences between methodologies for the offshore and onshore environment (for example the number of criteria used to define definitions of receptor sensitivity, whether moderate results in a significant effect etc). The ES should, where possible, provide a standardised methodology across all chapters to aid the reader.	The generic project-wide approach to the assessment methodology is set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, and it is likely that this same approach will be adopted for the ES. However, it is necessary to set out how this methodology has been applied, and adapted as appropriate, to address the specific needs of a particular environmental aspect. As such each aspect chapter within the PEIR and ES will explain how the aspect-specific assessment methodology has been adapted to deal with the specific requirements of the aspect assessment being carried out.
2.2.13	Report structure:	Noted. A consistent chapter structure has been adopted for the PEIR where appropriate. Chapter structure will be reviewed in the lead

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	It aids the reader if the ES uses a consistent chapter structure and contents pages for each subdivision of the document to aid navigation.	up to the ES; however, consistency between chapters will be maintained where appropriate.
4.0.1	Paragraph 20.1.1, Ordering of the Proposed Development components: The offshore project description in the Scoping Report is inconsistent with the wording used in the onshore description. The offshore description refers to the offshore cables starting in England and making landfall in Scotland, whereas the onshore describes the direction as from Scotland to England. The ES should be consistent in the description of the scheme, as it may lead to confusion over the direction of travel of the electricity or the order of construction.	The Applicant will ensure a consistent way of referring to the scheme for both the onshore and offshore components in the PEIR and ES.
4.0.2	Section 20.4, General Description: The Scoping Report offshore section does not provide a similar level of detail as given for the onshore scheme (for example cable voltage). The ES should provide a full set of technical parameters for the offshore cable installation.	This is noted. The Applicant will ensure a sufficient level of detail is provided in the project description in both the PEIR and ES for the English Offshore Scheme, that is consistent and comparable to the English Onshore Scheme, where appropriate. However, it should be noted that due to the nature of the English Onshore Scheme, the description of its components and construction methodology will inherently be more extensive.
4.0.3	Paragraph 20.4.1, Cable construction: The Scoping Report states that the English offshore scheme will comprise two power and one fibre optic cable, however it is unclear as to whether this is for both EGL3 and 4 or whether each of the projects will comprise of this construction. The ES should	This is noted. The Applicant will ensure a sufficient level of detail is provided in the project description for the English Offshore Scheme, including all technical parameters, and that distinction is made between EGL 3 and EGL 4. This is provided in **Volume 1, Part 1, Chapter 4: Description of the Projects**

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	provide a full set of technical parameters for the offshore cable installation.	
4.0.4	Paragraph 20.4.2, Cable separation: The Scoping Report states that there a scenario where a 30m separation may be required. The ES should provide a justification for this and also clarify whether this is to be a single trench of 30m width, or require two trenches at 30m separation, as the Inspectorate considers that there are likely to be differing effects between those two scenarios.	This is noted. The Applicant will ensure that clear justification is provided in respect of the separation distances required between cables in the ES. Each cable needs to be well-spaced from others for heat dissipation, to prevent overheating and subsequent reduction in its capacity for carrying current (cable rating). For the English Onshore Scheme, twelve HVAC cables are required in total i.e. two sets of three (totalling six AC cables) for the EGL 3 Project and two sets of three (totalling six AC cables) for the EGL 4 Project. Comparatively, only four HVDC cables would be installed for the English Offshore Scheme, (two for the EGL 3 Project and two for the EGL 4 Project), therefore the working width is considerably reduced for the HVDC cable system. The ES will include this detail.
4.0.5	Table 20-2, Pre-construction surveys and inclusion in the ES: The Inspectorate notes the approach taken in Scoping Report Table 20-2 which states that the impacts from the undertaking of surveys such as UXO [Unexploded Ordnance] will be included within the ES, however the subsequent works after these surveys such as UXO clearance will not be. Whilst the Inspectorate does not raise any matters on this approach, the ES must clearly state what has and has not been assessed, and where not assessed,	This is noted. The Applicant will ensure that the ES provides a clear description of works included and excluded from the assessment and will outline the process for seeking further consent for those activities outside of this assessment.

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	how it is secured that the assessment of this will be undertaken in future.	
4.0.6	Table 20-2, Seabed preparation: Scoping Report Table 20-2 states that sand removal may be required, and that this would be disposed of. The ES should provide details as to whether the excavated sand could be used in place of imported sand as cable protection as referred to in Table 20-1 and 20-2.	This is noted. The Applicant will explore the feasibility of this and should it prove feasible will further discuss with the Statutory Nature Conservation Bodies.
4.0.7	Table 20-3, Backfill of trenchless installations: Scoping Report Table 20-3 states that the “punch out points” may be left to naturally backfill. The ES should provide a justification of this, approach in terms of any potential effects.	This is noted. The Applicant will provide a robust assessment of this potential impact on receptors, including the assessment of sediment processes, this is presented in **Volume 1, Part 3, Chapter 18 Marine Physical Processes.**
4.0.8	Paragraph 20.7.1, Vessel movements: The ES should describe the expected number, type and frequency of vessel movements required to construct, operate and decommission the Proposed Development. If these are unknown, then the ES should explain the assumptions that have been made about vessel movements to inform assessment using a worst-case scenario.	This is noted. The Applicant will set out the worst case scenarios for each chapter. The Applicant is currently procuring the marine Contractor who will provide further details which will inform the assessments in the ES.
4.1.1	Decommissioning Whilst the Scoping Report seeks to scope out decommissioning for some aspects, the ES should ensure that it has taken into account future climate trends and erosion trends in relation to leaving cables and other components in situ.	This is noted and will be provided in the ES.

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4.1.2	Mitigation The ES should be clear as to where timing of works have been considered as mitigation and secure such in the DCO and/or control documents.	This is noted. The Applicant has prepared **Volume 2, Part 1, Appendix 1.5.C Outline Construction Environmental Management Plan** which sits alongside the PEIR and include all control and management commitments including timing of the works relevant to the English Offshore Scheme. In addition, **Volume 2, Part 1, Appendix 1.5.A Outline Register of Design Measures** sets out all commitments relevant to the design and operations of the English Offshore Scheme. These documents will be updated for the ES and will be secured by way of a condition through DML / via DCO submission.
4.1.3	Farnes Deep Marine Conservation Zone (MCZ) and Farnes Deep Highly Protected Marine Area (HPMA) Whilst it is noted that the boundaries of these designations overlap the features and conservation advice is different and as such, the EIA must make sure that the site and features of each site are considered within the assessments where relevant.	This is noted and the assessments in the ES will be updated to reflect the features and conservation objectives of each designation. The MCZ Assessment Screening presented in **Volume 2, Part 3 Appendix 3.17.A** includes assessment of both these designations and their features.
4.1.4	Receptors identified The ES should ensure that all receptors identified in aspect chapters are then clearly assessed unless these are subsequently scoped out with justification provided.	This is noted and will be provided in the ES.

*Note, this is the Planning Inspectorate's ID reference included within the Scoping Opinion.

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