



White Cross Offshore Windfarm Environmental Statement

Chapter 7: Consultation



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Glossary of Acronyms

Acronym	Definition
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
DCC	Devon County Council
DCLG	Department for Communities and Local Government
Defra	Department for Environment, Food and Rural Affairs
DWT	Devon Wildlife Trust
EA	Environment Agency
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
HRA	Habitats Regulation Assessment
IPCC	Intergovernmental Panel on Climate Change
JNCC	Joint Nature Conservancy Council
LPA	Local Planning Authority
MCAA	Marine and Coastal Access Act
MHWS	Mean High Water Spring
MMO	Marine Management Organisation
MW	Megawatts
NDDCP	North Devon District Council Planning
NE	Natural England
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OFTO	Offshore Transmission Owner
OWL	Offshore Wind Ltd
RSPB	Royal Society for the Protection of Birds
SLVIA	Seascape, Landscape and Visual Impact Assessment
UK	United Kingdom
WTG	Wind Turbine Generator

Glossary of Terminology

Defined Term	Description
Applicant	Offshore Wind Limited
Environmental Impact Assessment (EIA)	Assessment of the potential impact of the proposed Project on the physical, biological and human environment during construction, operation, maintenance, and decommissioning.
Landfall	Where the offshore export cables come ashore (up to MHWS)
Mean high water springs	The average tidal height throughout the year of two successive high waters during those periods of 24 hours when the range of the tide is at its greatest.
Mean low water springs	The average tidal height throughout a year of two successive low waters during those periods of 24 hours when the range of the tide is at its greatest.
Mitigation	<p>Mitigation measures have been proposed where the assessment identifies that an aspect of the development is likely to give rise to significant environmental impacts and discussed with the relevant authorities and stakeholders in order to avoid, prevent or reduce impacts to acceptable levels.</p> <p>For the purposes of the EIA, two types of mitigation are defined:</p> <ul style="list-style-type: none"> ▪ Embedded mitigation: consisting of mitigation measures that are identified and adopted as part of the evolution of the project design, and form part of the project design that is assessed in the EIA ▪ Additional mitigation: consisting of mitigation measures that are identified during the EIA process specifically to reduce or eliminate any predicted significant impacts. Additional mitigation is therefore subsequently adopted by OWL as the EIA process progresses.
Offshore Export Cables	The cables which bring electricity from the Offshore Substation Platform or the inter-array cables junction box to the Landfall (up to MHWS)
Offshore Infrastructure	All of the offshore infrastructure including wind turbine generators, substructures, mooring lines, seabed anchors, Offshore Substation Platform and all cable types (export and inter-array). This encompasses the infrastructure that is the focus of this application and Environmental Statement and the parts of the project consented under Section 36 of the Electricity Act and the Marine and Coastal Access Act 2009
the Offshore Project	The Offshore Project for the offshore Section 36 and Marine Licence application includes all components offshore of MHWS. This includes the infrastructure within the windfarm site (e.g. wind turbine generators, substructures, mooring lines, seabed anchors, inter-array cables and Offshore Substation Platform (as applicable)) and all infrastructure

Defined Term	Description
	associated with the export cable route and landfall (up to MHWS) including the cables and associated cable protection (If required).
Offshore Substation Platform	A fixed structure located within the Windfarm Site, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore
Offshore Wind Limited	Offshore Wind Ltd (OWL) is a joint venture between Cobra Instalaciones Servicios, S.A., and Flotation Energy Ltd
the Project	the Project is a proposed floating offshore windfarm called White Cross located in the Celtic Sea with a capacity of up to 100MW. It encompasses the project as a whole i.e. all onshore and offshore infrastructure and activities associated with the Project
White Cross Offshore Windfarm	100MW capacity offshore windfarm including associated onshore and offshore infrastructure
Wind Turbine Generators (WTG)	The wind turbine generators convert wind energy into electrical power. Key components include the rotor blades, nacelle (housing for electrical generator and other electrical and control equipment) and tower. The final selection of project wind turbine model will be made post-consent application
Windfarm Site	The area within which the wind turbines, Offshore Substation Platform and inter-array cables will be present
Works completion date	Date at which construction works are deemed to be complete and the windfarm is handed to the operations team. In reality, this may take place over a period of time.

7. Consultation

1. This chapter of the Environmental Statement (ES) presents the approach taken to consultation relating to the Environmental Impact Assessment (EIA) for the White Cross Offshore Windfarm Project (the Offshore Project). Specifically, this chapter outlines the technical and public consultation which has taken place to inform the EIA for the Offshore Project seaward of Mean High-Water Springs.
2. Technical consultation is defined as consultation with statutory and non-statutory bodies used to inform and focus the approach taken forward to the EIA. Public consultation is used to inform stakeholders, local communities, and those with an interest in the Offshore Project of project details, surveys, assessments, and potential effects. Feedback from public consultation benefits the Offshore Project development process. The general requirements for consultation in relation to the EIA are described below.

7.1.1 Approach to Consultation

3. Ongoing consultation with stakeholders and regulators for the Offshore Project Section 36 and Marine and Coastal Access Act 2009 (MCAA 2009) (and any other related or alternative) submission is an important aspect of the Offshore Project development process. Consultation provides an opportunity for all parties to discuss, agree and collaborate on key environmental areas of the Offshore Project. This also ensures early identification of environmental risks and/or opportunities associated with the Offshore Project.

7.1.2 Policy and Guidance

4. In order for the Offshore Project to proceed consent under the Section 36 of the Electricity Act 1989 and relevant Marine Licences under the MCAA 2009 are required. However, OWL have voluntarily decided to undertake a more comprehensive consultation approach, similar to that required under the Planning Act. For further details on the requirement of the Planning Act, see below in **Section 7.1.2.1**. Despite the Offshore Project not being a Nationally Significant Infrastructure Project (NSIP) and due to the lack of specific consultation requirements under Section 36 of the Electricity Act 1989 consultation has been undertaken following the relevant National Policy Statements (NPS) the NPS to ensure adequate consultation, see **Section 7.1.2.2**.

7.1.2.1 Planning Act 2008

5. The Planning Act sets out statutory requirements for applicants to engage in pre-application consultation with local communities, local authorities, and those who would be directly affected by the Offshore Project.
6. Sections 42 to 44 of the Planning Act set out details of who should be consulted, including local authorities, the Marine Management Organisation (MMO) (where appropriate), other statutory bodies, and persons having an interest in the land to be developed.
7. Section 47 of the Planning Act sets out the applicant's statutory duty to consult local communities. The applicant has a duty under Section 47 to prepare a Statement of Community Consultation (SoCC), and to undertake consultation in line with that statement. In addition, consultation should be undertaken with other people or groups who are not statutory consultees, but who may still be significantly affected by the Offshore Project.
8. Applicants are required under Section 37 of the Planning Act to produce a Consultation Report alongside the application, which details how the consultation requirements have been complied with.

7.1.2.2 National Policy Statements

9. Consultation has been undertaken with reference to the relevant NPS which form the primary national guidance documents for NSIPs. NPSs are statutory documents which set out the government's policy on specific types of Nationally Significant Infrastructure Projects (NSIPs) and are published in accordance with the Planning Act 2008.
10. Although the Offshore Project is not an NSIP, it is recognised that due to its size of 100MW and its location in English waters, certain NPS are considered relevant to the Offshore Project and decision-making and are referred to in this ES. These documents encourage applicants to carry out pre-application consultation with a range of stakeholders. The relevant NPS are:
 - EN-1 – Overarching NPS for Energy
 - EN-3 – Renewable Energy Infrastructure
 - EN-5 – Electricity Networks, which covers the electrical infrastructure in conjunction with EN-1
 - EIA and Habitats Regulations.

11. Habitats Regulations Assessment (HRA) is undertaken in relation to potential effects on European sites (the 'national site network' within the United Kingdom (UK) territory). Consultation is necessary with the relevant statutory bodies and any relevant non-statutory nature conservation bodies, in order to gather evidence to support the HRA. In practice this consultation is undertaken as an integral part of the EIA process, including a HRA report submitted alongside the ES.
12. The preferred way of consulting on HRA matters is to agree an Evidence Plan. Guidance on Evidence Plans was produced by Defra in 2012. The guidance provides an overview of the process and roles of the parties. It is common practice for the Evidence Plan Process (EPP) to include all issues where there are potential significant environmental impacts. Depending on potential impacts raised, additional consultation over and above that proposed as part of wider stakeholder consultation arrangements can be included. This approach is being followed for the Offshore Project, with the EPP having been initiated in January 2022. See **Section 7.1.5** for further details.

7.1.2.3 Local and National Policy and Guidance

13. The consultation approach also takes into account relevant local and national policy and guidance including:
 - Department for Communities and Local Government (DCLG). Planning Act 2008: Guidance on the pre-application process (2015)
 - The Planning Inspectorate Advice Note Two: The role of local authorities in the development consent process (2015, Version 1)
 - The Planning Inspectorate Advice Note Three: EIA consultation and notification (2017, Version 7)
 - The Planning Inspectorate Advice Note Eight: Overview of the nationally significant infrastructure planning process for members of the public and others (2016)
 - The Planning Inspectorate Advice Note Eleven: Working with public bodies in the infrastructure planning process (2017, Version 4)
 - The Planning Inspectorate Advice Note Fourteen: Compiling the Consultation Report (2021, Version 3).
14. In addition, the approach to consultation has been guided by discussions with the relevant local authorities, statutory consultees, the Scoping Opinion and by a review of best practice on recent applications of a similar nature and scale.

7.1.3 Pre-Scoping and Scoping Stage Consultation

15. To agree and discuss the Site Selection, EIA and HRA requirements during the scoping stage, focussed individual consultation took place with experts from relevant organisations (**Table 7.1**) with a clear statutory role or non-statutory interest in the topics considered. Scoping stage consultation was targeted at stakeholders considered the highest priority.
16. Pre-scoping and Scoping stage consultation aimed to achieve the following:
- Agree the scope of the EIA, the impacts to be considered
 - Agree scope of and methods for data collection where necessary (if not already agreed)
 - Agree realistic worst-case parameters (Rochdale Envelope) for assessment
 - Discuss and agree the assessment and analysis methods for the EIA (or HRA) including agreement on appropriate thresholds and agreeing terms for interpretation of impact and levels of significance.
17. Agreements and disagreements have been documented through meeting minutes and addressed later through the EIA and development process.

Table 7.1 Pre-scoping consultation meetings undertaken

Organisation Consulted	Activity	Dates
The Crown Estate	Document Review	14/07/2021
	HRA Approach	09/11/2021
	Development Plans	26/11/2021
National Grid ESP	Introductory meeting	20/08/2021
Marine Energy Wales	Introductory meeting	06/09/2021
Catapult	Introductory meeting	09/09/2021
Celtic Sea Power	MOU and data sharing agreement	27/11/2021
Saunton Golf Club	Project update and cable route options	11/01/2022
Cornwall Wildlife Trust	Introductory meeting	24/11/2021
Devon Wildlife Trust	Introductory meeting	24/11/2021
RSPB	Introductory meeting	13/12/2021
Cornish Fish Producers Organisation	Introductory meeting	10/12/2021
North Devon Fisherman's Association	Introductory meeting	10/12/2021
Cornish Fish Producers Organisation	Route selection workshop	28/01/2022
North Devon Fisherman's Association	Route selection workshop	28/01/2022
Savills – Christie Devon Estates	Introductory meeting	23/11/2021
	Route selection workshop	02/02/2022
	Project update	16/03/2022
		18/05/2022

Organisation Consulted	Activity	Dates
North Devon District Council	Introductory meeting	26/11/2021
Cornwall County Council	Introductory meeting	02/12/2021
Devon County Council	Introductory meeting	02/12/2021
Historic England	Introductory meeting	02/12/2021
Torridge District Council Planning	Introductory meeting	14/12/2021
Simply Blue Energy	Working together	19/08/2021
A&P Falmouth	Introductory meeting	21/09/2021
H&W Appledore	Introductory meeting	22/09/2021
ABP Port Talbot	Introductory meeting	28/09/2021
Pembroke Dock	Introductory meeting	08/10/2021
Bristol Port	Introductory meeting	06/04/2022
Marine Management Organisation	Introductory meeting	14/12/2021
Natural England	Introductory meeting	15/12/2021
Natural Resources Wales	Introductory meeting	30/11/2021

7.1.4 Public engagement

18. Public and landowner consultation has been undertaken using a variety of methods and includes opinions gained through the Scoping Report, public consultation, and project publicity. This information is captured in the Stakeholder Consultation database. The public consultation process has fed into the requirements of and comply with the parallel technical consultation. For public exhibitions we prepared materials and had technical leads and core team staff in attendance.
19. Feedback forms were made available during a public event to gain further insight into the public opinion. Responses from the feedback form can be found in **Table 7.2**.
20. Most responses of the feedback gained from the public event indicated there was an agreement for the need of the Offshore Project. Those that disagreed with the need for the Offshore Project had concerns over the landfall (up to MHWS) location due to the potential for impacts on seabirds and other marine life. For further information on how this concern has been addressed, refer to **Chapters 10: Benthic and Intertidal Ecology to 13: Offshore Ornithology**. The feedback also indicated concerns from surfing groups, therefore further consultation on the effects on waves and tidal currents has been carried out and the potential effects were assessed within **Chapter 8: Marine Geology, Oceanography, and Physical Processes**.

Table 7.2 Public event feedback

Time of response	How did you hear about the event?	Do you agree that there is a need for the White Cross project?	Do you have any comments on our cable route proposals?	Local community benefit projects will be delivered as part of the development. Which topic areas are a priority for your local community?	Please tell us what capacity you visited the event in?
17/10/2022 15:42	Other	Agree - As long-time supporter of green energy interested in potential for expansion of offshore wind, so welcome exploratory moves, but love/study Taw estuary so concerned that care is taken.	I've yet to hear details. Uncertain about net gain, our real shortage is education and dearth of local PEOPLE qualified/equipped/ supported to care for the fantastic environment we've already got. Net gain feels spurious to me.	"Education and skills development opportunities All the above, capital project - support for Saunton cycle route, about to get AONB boost, recurrent - an Estuary Officer, long favoured by Coastwise North Devon - my group."	Marine user and founder of Coastwise North Devon
21/10/2022 18:14	Word of mouth	Agree - Increase in renewable energy is "a good thing"	I have concerns about the northern cable route. Saunton sands is regarded as one of the best longboard surfing breaks in the UK and hosts elite level competition each year. Surfing is a huge part of the local economy and community and Saunton attracts thousands of visits each year for its waves from locals and visitors. Whilst it is a long beach	Sustainable travel	Marine user

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			<p>with waves seemingly the whole length, the premier “break” is located next to the rocks on the north end. This is the most popular area and where the contest is held. The waves at Saunton break over sand banks rather than rock so their shape and quality are affected by the sand movements. The northern cable route potentially will affect the sand movement and bank formation and could unwittingly wreck the wave quality of the beach which would cause knock on effects to the community economy and also (I know it sounds dramatic, but it is a valid point) community mental health. There are many examples worldwide where seemingly unrelated or minor engineering projects have wrecked or even destroyed a popular surfing wave. Whilst I welcome investment in renewable energy, I and the numerous regular at Saunton would be unwilling to exchange renewable energy for our favourite wave.</p>		

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22/10/2022 14:45	Social media	Strongly Agree - We must as a nation embrace green power generation. You only need to look at the current state of the world and UK energy generation to realise this.	I am a surfer, the cable route close to the rocks at Saunton will cut straight through a break called The Cave and may have unintended consequences on the quality of the waves in our North Devon Surf Reserve. If the cable was run 400-500 metres to the South of the edge of Saunton this would avoid the potential damage to the wave.	Sustainable travel - bike route from Braunton to Saunton to extend the Tarka Trail	Member of the public
22/10/2022 18:03	Social media	Strongly Disagree - No Response	No Response	Environmental improvements - BNG	Member of the public
23/10/2022 18:31	Community Website	Strongly Agree - Yes. We need to de-carbonise our electricity sources and wind power is a huge part of that.	Please ignore the surfers moaning. I also surf and I recognise that the enjoyment a handful of people get from it is miniscule in comparison to the utility that is provided by more renewable electricity generation. Likewise, it is also hard to believe the cable would alter the sandbars anyway so the surfers complaining are just typical NIMBY's.	Other - N/A	Marine User
23/10/2022 20:22	Social media	Agree - Pro any green technology but the exact location need to be carefully	The natural process that are shaping the most consistent wave should be protected and not altered. The cable route should be modified and located	Other - no change to the wave profile	Marine User

Time of response	How did you hear about the event?	Do you agree that there is a need for the White Cross project?	Do you have any comments on our cable route proposals?	Local community benefit projects will be delivered as part of the development. Which topic areas are a priority for your local community?	Please tell us what capacity you visited the event in?
		considered and take into consideration all users of the coast	further away. In addition, studies of impact on the wave should also be considered detailing worst case scenarios. Many people are drawn to this wave for their mental and physical well-being, and this should be considered as one of the key priorities for any project.		
24/10/2022 09:57	Word of mouth	Strongly agree - The main Identifier here to protect is Planet earth and its natural beauty as best as possible.	Braunton Burrows is a UNESCO site of significant importance. At a time of ever-changing environments, sites like this need protecting and any disturbance of this could have catastrophic consequences to the farm lands around and the local villages surrounding. You can already see the effects around Crow point where a noticeable bank has eroded and the breaching of Horsey Island. Disturbing the burrows will certainly weaken the sand exaggerating the erosion. The burrows are already noticeably smaller than they were 10 years ago. People have talked about tunnelling the cable to save disturbing the land and habitats, But	"Education and skills development opportunities - North Devon is highly reliant on the tourism industry at present, with this project and the application for a Maritime Innovation centre, as well as the shipyard reopening, It would be great to see further investment into long term jobs and development	Marine user

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			the cost of this is large machinery which will bring high costs and CO2 emissions with it.	within the maritime and marine sector. "	
24/10/2022 12:06	Social media	Agree - Experimental is the operative word. If the power generated is poor or the cabling causes environmental damage the installation should be removed. Any negative aspects should be publicised as well as the positive ones.	Straight through the Burrows returns the area to WW2 status and will need to be carefully monitored to see that dune succession occurs in a relatively natural way	Environmental improvements - BNG	Local Landowner
24/10/2022 12:11	Word of mouth	Agree - We need offshore wind but not sure if this scheme is deliverable, seems it will be very slow to get of ground	Why through the Burrows? surely best to minimise destroying natural landscape and go up the estuary	Sustainable travel	Local Landowner
24/10/2022 13:56	Word of mouth	Strongly agree - We need the energy - let's take advantage of what we have.	Yes, please conduct a full and proper analysis of the disruption to the wave at Saunton beach. Many businesses depend upon tourism from surfers -	Local community facilities	Marine user

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			<p>year-round! As of this point there doesn't seem to be any information about the direct impact to this important leisure area. Surfing is big business around here and it would be a bit of boo-boo if the wave at Saunton was disturbed or destroyed through lack of understanding. Tourists don't flock to East Anglia due to the nature of the seabed. Here they do. Simply saying there will be no disruption is not good enough. If you want to understand it for yourself then please come down on a sunny day when there are waves, and you will see hundreds of people parked at Saunton specifically for surfing.</p>		
02/11/2022 08:50	Social media	Strongly Disagree - As a local resident of Braunton at the moment all though I fully support renewable energy and the need to reduce the use of fossil fuels I must	We will need a lot more information on how your company plans to place the cabling in and around Saunton Sands. Non-local companies disrupt the area with construction which can already be seen in all the new second homes being constructed on the coastline. The main concern would be possible damage to the beach and	Sustainable travel - Road quality improvement, Cycle paths, Community services like a public swimming pool / tennis courts / play parks near the beach. Road traffic	Local Landowner

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		<p>express great concern over the plan for the cabling to make landfall (up to MHWS) around Saunton Sands. At a glance the floating turbine in deep water seems like a fantastic idea as long as it does not affect seabirds or surrounding marine life.</p>	<p>Braunton Burrows which is a diverse ecosystem and a stunning area of natural beauty. It hosts a lot of bird life, insects, plant life and is an important habitat for adders. The secondary concern would be the disruption to Saunton on the beach in the surrounding regions where people participate in water sports like surfing, swimming, kitesurfing, paddle boarding and kayaking. How long these activities could be disrupted for? Will your construction vehicles/vessels be directly located on Saunton sands beach for a long period of time? Thirdly A lot of local business rely heavily on foot traffic from the surf and water sport culture and regular holiday makers. If there was a reason for them not to choose Saunton as a destination due to access being restricted causing them not to spend their money in the area it could directly affect local coffee shops, surf shops and Surf schools</p>	<p>improvement in Braunton in high season (summer months)"</p>	

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04/11/2022 09:15	Social media	Strongly agree - It is incumbent on the world as individuals to work towards the IPCC target of keeping global warming to 1.5°C above pre-industrial levels by 2030. North Sea oil and gas and fracking is not the answer. Our energy mix and energy security need to be sourced from renewables. On a global scale this presents many obstacles, but we can help on a local level by embracing projects like this which seemingly provide a solution	who already struggle with the seasonal nature of the area. Is the site going to be permanent/semi-permanent or temporary for the duration of the Offshore Project's test and demonstration? If the Offshore Project is a success, will the number of wind turbines increase and to how many? Will the power generated be utilised by North Devon direct or is it fed back into the UK's energy mix? If North Devon does not benefit directly, why is the site positioned at this location? Why not further up or down the coast? Why does the cable route corridor come over land from the preferred location(s)? Why not follow the mouth and flow of the River Taw?	Education and Skills development opportunities	Other

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		with relatively little impact.			
06/11/2022 09:17	Word of mouth	Strongly agree - I'm excited about the prospect of developing floating platforms that have the possibility to open up the number of off shore locations for windfarms globally.	As a kite surf and surfing family at Saunton we use the beach a lot and would be concerned about works that would restrict access or change the quality of the waves. It feels like landing the cable half way down the beach makes more sense from that point of view as the beach is less heavily used there and the works won't affect sea users. The area by the cliffs is crucial to surfers paddling out and even if access to that part of the beach isn't restricted for too long, changing the seabed around there could permanently affect the quality of the surf.	Local community facilities	Local Landowner - home owner in Croyde
08/12/2022 05:53	Social media	Not Sure - Wind energy needs to be harvested but not at the expense of the best longboard surfing wave in the country.	I'm sure taking this cable up the taw estuary would be a better option for the environment and community	Other - The surf industry brings in a huge amount of tourism if you ruin the best longboard wave in the country jobs and livelihoods will be affected	Member of the public

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10/12/2022 10:02	other	<p>Not Sure - Our organisational philosophy is about 'Sharing our Seas successfully'. We are hugely supportive of desperately needed renewables and excited about the prospect of offshore floating wind. Our priority is to work with our local community N Devon Hub to give seals a voice in this consultation and to ensure all appropriate and reasonable mitigation is put in place to ensure seals (and people) can thrive within and beyond the footprint of the wind farm. The only reason we are</p>	<p>What evidence have you discovered about the use of this region of sea by seals as they are not mentioned (as far as we can see) in your exhibition. Lundy is key habitat for grey seals being a Special Area of Conservation for the species. Important land-based seal haul out sites also exist on the N Devon mainland. Aerial surveys are not a suitable method for surveying seals at sea, nor particularly for seals on land. We are keen to help and have been working with Cornwall Flow</p>	<p>"Environmental improvements - BNG We cannot afford to lose any more biodiversity which supports the local North Devon coastal economy. Net gain is essential for our ability to survive and thrive. "</p>	

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		<p>unsure is the relatively small number of homes energy will be generated for.</p>			

7.1.5 The Evidence Plan Process

21. The Evidence Plan Process (EPP) is a non-statutory, voluntary process, and there are no legal obligations associated with it. The EPP is a mechanism to help agree the information needed in the EIA and HRA. It has been used to great effect on multiple Nationally Significant Infrastructure Projects (NSIPs) in England, therefore this approach has been undertaken by the Offshore Project. The EPP improves the consultation process by:
 - Giving greater certainty to all parties on the amount and range of evidence to be presented within the application
 - Providing structure and efficiency to discussion and sequential identification of key environmental and consenting issues
 - Enabling time and resource requirements to be planned and optimised for all parties
 - Helping address and agree issues earlier on in the pre-application stage where possible so robust, streamlined decisions can be taken, and additional data can be collected as required
 - Providing a platform to debate advice on each topic between multiple agencies.

22. The EPP should also:
 - Ensure advice of the Expert Topic Groups is compliant with planning requirements and regulations, including:
 - Overarching National Policy Statement (NPS) for Energy (EN-1)
 - NPS for Renewable Energy Infrastructure (EN-3)
 - NPS for Electricity Networks Infrastructure (EN-5)
 - Marine Policy Statement
 - South West Inshore and South West Offshore Marine Plans
 - South West Shoreline Management Plan
 - Local plans for the relevant local planning authorities.
 - Focus the evidence requirements so they are proportionate to the Offshore Project's potential impacts.

23. The EPP did not replace or duplicate existing requirements. The EPP was formulated to fit with the Section 36 consent application process and provides the audit trail for documents produced by the Offshore Project, which were formally consulted upon.

24. Meetings were constructive in enabling the Offshore Project and Stakeholders to reach agreement where possible in an efficient manner. It is however recognised that on some occasions, stakeholders were not able to confirm the position of their

organisation during a meeting. In this event, the disagreement was included within minutes and marked as an action to be resolved to confirm the stakeholders' position.

7.1.5.1 Technical consultation

25. Technical consultation has been undertaken with statutory and non-statutory consultees and stakeholders upon technical matters of the Section 36 consent application. Following the receipt of the Scoping Opinion, Expert Topic Groups (ETGs) were established to provide additional expert input into the EIA and HRA processes. This facilitated a consensus to be reached on the scope and approach to the impacts included within the EIA, and the comprehensiveness and suitability of data used. Individual chapters within the ES have a section on consultation, the section details how specific queries relevant to that particular topic were addressed.
26. To agree and discuss the EIA and HRA requirements following the scoping stage, ETGs were established for each topic area with experts from relevant organisations with a clear statutory role or non-statutory interest in the topics to be considered. ETGs are an effective tool in the Development Consent Order process, therefore the process has been used and adapted to support the Section 36 and Marine Licence application in order to take this best practice approach. Regular meetings took place following the scoping stage. The ETGs had the following responsibilities:
 - Agree the final scope of the EIA, the impacts to be considered
 - Agree methods for data collection where necessary (if not already agreed)
 - Following collection of data, discuss and agree the appropriateness and sufficiency of data for the assessments to be undertaken
 - Agree realistic worst-case parameters (Rochdale Envelope) for assessment
 - Discuss and agree the assessment and analysis methods for the EIA (or HRA) including agreement on appropriate thresholds and agreeing terms for interpretation of impact and levels of significance
 - If significant issues are present following assessment, discuss and agree the mitigation or management requirements to avoid or reduce adverse effects
 - It is recognised that this process can be iterative as the process develops, each topic group should follow the above process and agree as much as is reasonably practicable in the pre-application phase. Anything that cannot be agreed during pre-application will be documented.
27. The programme of ETG meetings were broadly structured around the key project milestones and the number and frequency of meetings for each topic were agreed by each ETG. **Table 7.3** shows the offshore ETG and organisations represented.

Table 7.3 Offshore Expert Topic Groups and Organisations Represented

ETG	Members
Marine Mammal Ecology (for further information see Chapter 12: Marine Mammal and Marine Turtle Ecology, Section 12.5)	Marine Management Organisation (MMO) NE North Devon District Council Planning (NDDCP) Devon Wildlife Trust (DWT)
Offshore Ornithology (for further information see Chapter 13: Offshore Ornithology, Section 13.3.15)	NE RSPB MMO Devon County Council (DCC) DWT NDDCP
Benthic Ecology (for further information see Chapter 10: Benthic and Intertidal Ecology, Section 10.3.7)	NE MMO NDDCP DWT JNCC
Marine Geology, Oceanography and Coastal Processes (for further information see Chapter 8: Marine Geology, Oceanography, and Physical Processes, Section 8.3.9)	NDCP NE MMO Environment Agency (EA)
Archaeology and Cultural Heritage (for further information see Chapter 16: Marine Archaeology and Cultural Heritage, Section 16.3.11)	Historic England DCC National Trust
SLVIA (for further information see Chapter 19: Offshore Seascape, Landscape, and Visual Amenity, Section 19.3.8)	NE NDDCP DCC Torridge County Council Cornwall AONB Devon AONB Historic England

7.1.5.2 Consultation under the EPP

28. A summary of the consultation held under the EPP is provided in **Table 7.4** below.

Table 7.4 Overview of offshore meetings (to date)

Group	Meeting Dates	Purpose
Public and Councillors meeting	08/12/2021 09/12/2021	Project introductory meeting
Public consultation 1	08/07/2022	Present project and gain feedback
Traffic and Transport ETG	06/04/2022	Present project and assessment methods
Marine Ecology ETG	05/05/2022	Present project and assessment methods

Group	Meeting Dates	Purpose
Ornithology ETG	09/05/2022	Present project and assessment methods
Heritage ETG	17/05/2022	Present project and assessment methods
Marine Geology ETG	26/05/2022	Present project and assessment methods
Noise ETG	16/06/2022	Present project and assessment methods
Braunton Parish Council	23/06/2022	Braunton Parish Council project update
Collective DCC and NDDC meeting	14/07/2022	Discussion of project across a range of topics
Coastwise North Devon meeting	20/10/2022	Present project and gain feedback
Public Consultation 2	21/10/2022	Present Project progress and gain feedback
SLVIA ETG	11/10/2022	Project update, methods and impacts to be scoped in
Marine mammal ETG	14/11/2022	Project update, methods and impacts to be scoped in
Heritage ETG 2	11/01/2023	Project update, assessment findings
Coastal Geomorphology ETG	19/01/2023	Project update, assessment findings, potential effect conclusions.