WHITE CROSS

White Cross Offshore Wind Farm ES Addendum

Document Code:	WHX001-FLO-CON-ENV-RPT-0003	
Contractor Document Number:	PC2978-RHD-ZZ-XX-RP-Z-0759	
Version Number:	00	
Date:	*Issue Date 20/03/2024*	
Prepared by:	CB	*Electronic Signature*
Checked by:	MJ	*Electronic Signature*
Owned by:	OG	*Electronic Signature*
Approved by Client :	OG	*Electronic Signature*

Version Number	Reason for Issue / Major Changes	Date of Change
00	For issue	01/07/2024

Table of Contents

Table of Tables

Table of Figures

Glossary of Acronyms

Acronym	Definition
ADBA	Archaeological Desk Based Assessment
ALARP	As Low as Reasonably Possible
ALC	Agricultural Land Classification
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ASR	Annual Status Report
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity Net Gain
BSIP	Bus Service Improvement Plan
CBRA	Cable Burial Risk Assessment
CEMP	Construction Environmental Management Plan
Cefas	Centre for Environment, Fisheries and Aquaculture Science
CNI	Critical National Infrastructure
CNVMP	Construction Noise and Vibration Mitigation Plan
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Site
DBA	Desk Based Assessment
DCC	Devon County Council
DECC	Department for Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department of Energy Security and Net Zero
DWT	Devon Wildlife Trust
EA	Environment Agency
ECP	England Coast Path
ECT	Environment and Consents Team
EIA	Environmental Impact Assessment
EPS	European Protect Species
EPSL	European Protected Species Mitigation Licence
ES	Environmental Statement
ESO	Electricity System Operator
EU	European Union
FEED	Front End Engineering and Design
FLOW	Floating Offshore Wind
GCN	Great Crested Newt
GI	Ground Investigations
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HPPC	Heanton Punchardon Parish Council

Acronym	Definition
HSE	Health and Safety Executive
IAQM	Institute of Air Quality Management
IFCA	Inshore Fisheries and Conservation Authority
INNS	Invasive Non-Native Species
IPC	Instow Parish Council
LCA	Landscape Character Area
LCT	Landscape Character Type
LEMP	Landscape and Ecological Management Plan
LNR	Local Nature Reserve
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
ML	Marine Licence
MCAA	Marine and Coastal Access Act 2009
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MS	Method Statement
NDC	North Devon Council
NDTLP	North Devon and Torridge District Plan
NE	Natural England
NNR	National Nature Reserve
NPPG	The National Planning Practice Guidance
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Projects
NSR	Noise Sensitive Receptor
OCEMP	Outline Construction Environmental Management Plan
OCLP	Outline Cable Landfall Plan
OCTMP	Outline Construction Traffic Management Plan
OFTO	Offshore Transmission Owner
OSP	Offshore Substation Platform
OUNMP	Outline Underwater Noise Monitoring Plan
OWSI	An Outline Written Scheme of Investigation
PAD	Protocol for Archaeological Discoveries
PDE	Project Design Envelope
PEMMP	Outline Project Environmental Management & Monitoring Plan
PIDS	Perimeter Detection System
RIAA	Report to Inform an Appropriate Assessment
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SSSI	Site of Special Scientific Interest
SWCP	South West Coast Path
TCPA	Town and Country Planning Act 1990

Acronym	Definition
TDC	Torridge District Council
TJB	Transition Joint Bay
UXO	Unexploded Ordnance
WCOWL	White Cross Offshore Wind Limited
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

1. Introduction

1.1 Project Background

1. White Cross Offshore Windfarm is a proposed floating offshore windfarm located in the Celtic Sea with a capacity of up to 100MW. The 'Onshore Project' covers all infrastructure of the project landward of Mean Low Water Springs (MLWS). The Onshore Project is a separate Town and Country Planning Act 1990 (TCPA) application to the Offshore Project components, which have been submitted as a separate Section 36 (under the Electricity Act 1989) and Marine Licence (ML) application to the Marine Management Organisation (MMO) following the MMO confirming that they would not consent the Onshore Infrastructure of the Windfarm Project. The Onshore Project includes the infrastructure associated with the Landfall at Saunton Sands (to MLWS) where the onshore elements connect to the Offshore Project infrastructure, Onshore Export Cable (including joint bays and link boxes), Taw Estuary Crossing, a new White Cross Onshore Substation, and an Interconnecting Cable to the Grid Connection Point at the existing East Yelland Substation.

2. The set of consents/permission required in order for the Project as a whole to proceed are outlined below:

   - Planning permission under the Town and Country Planning Act 1990 (TCPA) 1990) is required for the following Onshore Project infrastructure (landward of MLWS):
   - Offshore export cables (from MLWS to above Mean High Water Springs (MHWS) at the Landfall and Transition Joint Bay (TJB))
   - Onshore export cables (2 x 66 kilovolts (kV) or 1 x 132kV from Landfall to White Cross Onshore Substation and 132kV from the White Cross Onshore Substation to Grid Connection Point) – excluding section below MLWS at the Taw Estuary crossing
   - White Cross Onshore Substation
   - Temporary main construction compound and temporary construction compounds
   - Transition Joint Bay, jointing bays, link boxes, access roads and haul roads
   - Grid Connection Point.

3. Consent under the Section 36 of the Electricity Act 1989 and a Marine Licence under the Marine and Coastal Access Act 2009 (MCAA 2009) from the MMO are required for the following generation assets (within the Windfarm Site):

   - Wind Turbine Generators (WTG)
   - Semi-submersible floating platforms
   - Subsea catenary mooring lines

- Anchoring solutions (drag embedment anchors, suction anchor or pin piles)
- Inter-array cables and associated protection
- Other associated offshore infrastructure, such as navigational markers.
- A second Marine Licence is required to enable the option for an Offshore Transmission Owner (OFTO) to be appointed under The Electricity (Competitive Tenders for Offshore Transmission Licences) Regulations 2015 for the following transmission assets (to MHWS):
- Offshore Substation Platform
- Offshore export cable
- Other associated offshore infrastructure, such as navigational markers.

4. Further detail on the consenting regime and relevant legislation is presented in **Chapter 3: Policy and Legislative Context** of the **Onshore** and **Offshore Environmental Statements** (ES).

1.2 Need for the Project

5. The Celtic Sea, a new area for offshore wind development, is seen by the UK Government as an opportunity for the development of floating offshore wind due to its deep waters and strong prevailing wind. As a new area for development smaller '*Test and demonstration'* projects such as White Cross are required to prove this technology in the Celtic Sea, support the development of a local supply chain and build investor confidence for larger future developments.

6. To deliver the *'test and demonstration'* function of this project it is essential that White Cross is constructed ahead of 2030 to pass on relevant development, construction and operational learnings to the wider industry.

7. From The Crown Estate Leasing Round 5 Information Memorandum. '*Our test and demonstration (T&D) leasing opportunities are expected to further advance floating offshore wind technology development. These T&D projects can de-risk the delivery of Round 5 by proving new technologies and approaches to construction, giving the regional and UK supply chains vital early learning opportunities to build their capacity and capability to serve the market at commercial scale.'*

1.3 Purpose of this Document

8. This document provides the Applicant's responses to comments from regulators and statutory consultees. This includes sign-posting to existing information within the Onshore and Offshore ES which WCOWL feel provides a sufficient response.

9. To supplement the responses, further information and assessment has been provided on a topic-by-topic basis. This document is submitted to both the MMO

and North Devon Council (NDC) to address comments on the Offshore Project and Onshore Project respectively.

1.4 Structure of this Document

10. This structure of this document is as follows:

- **Section 2**: summary of the consultation process and the comments received on the Offshore and Onshore applications,
- **Section 3**: response to comments received on planning, policy and legislation
- **Section 4**: response to comments received on the site selection and assessment of alternatives
- **Section 5**: response to comments received on the project description, post-submission design changes, clarification of the operations and maintenance, and decommissioning phases of the Project
- **Section 6**: response to comments received on the Onshore ES
- **Section 7**: response to comments received on the Offshore ES
- **Section 8**: references
- **Section 9**: appendices (see **Table 1.1** below).

Table 1.1 Summary of appendix documents submitted alongside the Environmental Statement Addendum Report

Document	Title	Document Summary
Appendix A	Response to Natural England	Detailed response to comments from Natural England, including sign-posting to where further information or clarifications are provided within the **ES Addendum**. This includes additional figures and a Hydrogeological Technical Note as Annexes.
Appendix B	Response to MMO & Centre for Environment, Fisheries and Aquaculture Science (Cefas)	Detailed response to comments from MMO & Cefas, including sign-posting to where further information or clarifications are provided within the **ES Addendum**. This document includes four Annexes.
Appendix C	Response to Environment Agency	Detailed response to comments from the Environment Agency, including sign-posting to where further information or clarifications are provided within the **ES Addendum**. This document includes a flood risk clarification note.
Appendix D	Flood Risk Assessment	Updated report addressing comments received during statutory consultation.
Appendix E	Outline Drainage Strategy	Updated drainage strategy addressing comments received during statutory consultation.
Appendix F	Coastal Geomorphology Technical Note	Technical note to provide clarifications in response to comments received during statutory consultation.

Document	Title	Document Summary
Appendix G	Hydrogeological Risk Assessment	New report addressing comments received during statutory consultation.
Appendix H	Supplementary Bat Activity Survey Report (Saunton Road)	Updated report incorporating results of survey completed post-submission, to include surveys completed in April and May 2024.
Appendix I	Approach to Bat Mitigation	New report addressing comments received during statutory consultation.
Appendix J	Wintering Bird Survey Report (Braunton Marsh and River Taw)	New report incorporating results of survey completed post-submission.
Appendix K	Approach to Lapwing Mitigation	New report addressing comments received during statutory consultation.
Appendix L	Petalwort Desk-Based Assessment and Survey Report	New report incorporating results of survey completed post-submission.
Appendix M	Archaeological Trial Trenching Report	New report incorporating results of survey completed post-submission.
Appendix N	Outline Landscape and Ecological Management Plan	New report addressing comments received during statutory consultation.
Appendix O	Lighting Impact Assessment	Updated report addressing comments received during statutory consultation. Includes assessment of impacts during construction.
Appendix P	Mitigation Register	Updated document capturing all the project mitigation commitments set out within the Onshore and Offshore ES' and the **ES Addendum**.
Appendix Q	Ornithology Assessment	New report addressing comments received during statutory consultation. This document contains three Annexes.
Appendix R	Agricultural Land Classification Soil Survey	New report incorporating results of survey completed post-submission.
Appendix S	Hydrofracture Report	Updated report incorporating results of onshore ground investigation.
Appendix T	Onshore Ground Investigation Interpretative Report	Interpretative report to include summary of desk study and ground investigations, ground model for each crossing/sub-length of route, and a preliminary engineering assessment for each crossing.
Appendix T Annex 1	Onshore Ground Investigation Factual Report	Factual report detailing results of onshore ground investigations undertaken post-submission.
Appendix U	Updated Cable Burial Risk Assessment	Updated report using project-specific and existing geotechnical data to understand seabed characteristics.
Appendix V	Updated Marine Mammal Mitigation Protocol	Updated report addressing comments received during statutory consultation.

Document	Title	Document Summary
Appendix W	Geoarchaeological Monitoring of Ground Investigation (GI) Works	New report detailing results of intrusive ground investigation works.
Appendix X	Planning Policy Clarifications Note	Note to provide planning policy clarifications in response to comments received during statutory consultation.
Appendix Y	Outline Cable Landfall Plan	New plan providing further information following comments received during statutory consultation.
Appendix Z	Onshore Cable Route Assessment Summary	New document summarising onshore cable route assessment process for all potential routes considered.
Appendix AA	Greater Crested Newt Survey Report	Report incorporating supplementary results of survey completed post-submission.
Appendix AB	Response to RSPB (Offshore)	Detailed response to comments from the RSPB on the Offshore Application, including sign-posting to where further information or clarifications are provided within the **ES Addendum**.

11. In addition, the following document have been submitted to the MMO and NDC are standalone documents. These documents will remain 'live' and will be further defined and updated post-consent, pre-construction and throughout the lifetime of the Project following a change management process (see **Figure 5.2**). They form part of the package of **Further Environmental Information** but are not part of this **ES Addendum**.

Table 1.2 Summary of standalone documents submitted alongside the Environmental Statement Addendum Report

Document Reference	Title	Document Summary
WHX001-FLO-CON-ENV-PLN-0011	Outline Decommissioning Programme	Document provides outline preliminary information to give an indication of the approach to decommissioning of both the onshore and offshore components.
WHX001-FLO-CON-ENV-PLN-0010	Outline Construction Environmental Management Plan (CEMP)	The CEMP presents the typical framework for both the onshore and offshore elements of the Project. It sets out the controls and processes that will be developed and adopted throughout the pre-construction and construction phases to mitigate environmental impacts and manage environmental risks throughout the construction phase of the Onshore Project.
	Waste Audit Statement	Appendix to the OCEMP which demonstrates that appropriate waste management measures will be developed and implemented during all phases of the Onshore Project.

Document Reference	Title	Document Summary
WHX001-FLO-CON-ENV-PLN-0007	Outline Cable Specification and Installation Plan	Document provides available information on cable specification and installation process as well as clarity on how and when further information will be available.
WHX001-FLO-CON-ENV-PLN-0012)	Outline Bentonite Management Plan	A technical note providing a high-level overview of 'Bentonite' in the terrestrial environment and to summarise bentonite drilling fluid, potential risks and subsequent mitigation measures.
WHX001-FLO-CON-ENV-RSA-0001	Draft Chemical Risk Assessment	A draft risk assessment to establish and maintain a system for the control, use, storage, transport and reporting requirements of chemicals during the construction and operational (including maintenance) phases of the project.
WHX001-FLO-CON-ENV-PLN-0003	Outline Project Environmental Management & Monitoring Plan (PEMMP)	This document outlines the monitoring objectives anticipated to be required under the Marine Licence, to support the grant of consent for the Project and provide clarity to the MMO and all other relevant statutory consultees, on the rationale, limitations and deliverability of the monitoring requirements.
WHX001-FLO-CON-ENV-PLN-0006	Outline Underwater Noise Monitoring Plan	Provides a proposed approach to monitoring of underwater noise during the operation and maintenance phase of the Project. Details will be refined as definitive condition wording is provided.
WHX001-FLO-CON-ENV-PLN-0009	Outline Invasive Non-Native Species Management Plan	The Outline Invasive Non-Native Species (INNS) Management Plan presents outline details of the practices to manage the risk of introducing or spreading of INNS during the construction, operation and maintenance in terrestrial, marine and freshwater environments.
WHX001-FLO-CON-ENV-PLN-0008	Outline Offshore Operation and Maintenance Plan	An outline plan of reasonably foreseeable offshore operational and maintenance activities and the broad approach to be taken for each activity.
WHX001-FLO-CON-ENV-PLN-0004	Outline Marine and Intertidal Pollution Contingency Plan	The plan sets out outline measures which could be utilised in response to a marine or intertidal pollution incident during all phases of the Project. The plan is relevant for all works up to mean high water springs (MHWS) and provides all available necessary information at the pre-consent stage.
WHX001-FLO-CON-ENV-PLN-0002	Entanglement Monitoring and Remediation Plan	Outline at the pre-consent stage of the proposed approach to monitoring and remediation of entangled marine mammals, marine turtles and marine debris during the construction and operation of the project.
WHI001-FLO-CON-STK-RPT-0001	Statement of Community Consultation	Summary of stakeholder engagement following formal consultation in 2023.

2. Consultation

12. Consultation has been a key part of the development of the Project and has continued during the post-submission phase. An overview of the project consultation process is presented within **Chapter 7: Consultation** of both the **Onshore** and **Offshore Environmental Statements**.

13. A period of statutory consultation was held for each of the applications, running for 42 days. The statutory consultation on the onshore application ran from 19th September to 30th October 2023. The statutory consultation for the offshore application ran from 27th September to the 7th November 2023.

14. A summary of the statutory consultees who responded, the topics their comments relate too, and where in the **ES Addendum** their comments are addressed is outlined below in **Table 2.2**.

15. It should be noted that some statutory consultees provided a separate response to each application, some a single response that covered both applications, and some only responded to either the offshore or onshore application. Further information on how WCOWL have addressed the comments from statutory consultees, and where responses to them can be found, is provided in **Section 2.2** to **2.5** below.

2.1 Regulation 25 Letter

16. Following the receipt of comments from statutory consultees NDC issued a formal letter requesting the submission of further environmental information under Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

17. This **ES Addendum** is being provided in response to that request for further environmental information. **Table 2.1** below sets out the further environmental information requested by NDC and where in this **ES Addendum** it is provided.

Table 2.1 Summary of NDC Regulation Request for further environmental information

Regulation 25 Request (letter dated 4th March 2024)	Where addressed in Environmental Statement Addendum (ESA)
Further survey data relating to bats, wintering birds, great crested newts, petalwort and badgers (with reference to Natural England's consultation response of 3rd November and Devon Wildlife Trust's letter dated 3rd October and 21st February 2024).	Further survey work has been undertaken in relation to the species identified. The survey results can be found in the following **ES Addendum** appendices: • **Appendix A: Response to Natural England** • **Appendix H: Supplementary Bat Activity Survey Report (Saunton Road)**

Regulation 25 Request (letter dated 4th March 2024)	Where addressed in Environmental Statement Addendum (ESA)
	• **Appendix I: Approach to Bat Mitigation** • **Appendix J: Wintering Bird Survey Report (Braunton Marsh and River Taw)** • **Appendix K: Approach to Lapwing Mitigation** • **Appendix L: Petalwort Desk-Based Assessment and Survey Report.**
Update to Report to Inform the Appropriate Assessment following completion of requested surveys.	The Applicant considers that there is sufficient information provided in **Appendix 6.A: Report to Inform Appropriate Assessment (RIAA)** of the **Onshore ES** to conclude that there will no Adverse Effect on Integrity (AEoI) as a result of the Project. However, following the comments provided by Natural England, further surveys, assessment and evidence have been provided and are detailed in **Appendix A**, these confirm the assessment conclusions in the **RIAA**. Given that no conclusions of AEoI are subject to change as a result of the further evidence provided, it is considered that it is not necessary to update the **RIAA**. Further justification is provided in **Appendix A: Response to Natural England Annex 10: Report to Inform Appropriate Assessment Note** of the **ES Addendum**.
Further information relating to the likely significant impacts as a result of cable route construction activities. In particular relating to: • lighting • fencing • security • containment • noise / vibration • hydrology • drainage impacts • flood risk • ground investigations (geological) • Unexploded Ordnance (UXO) onsite identification/ detection and detonation methodology coupled with the potential resulted impacts from these matters on ecology, designated	Further assessment of construction activities has been prepared and is included in the following **ES Addendum** appendices: • **Appendix D: Updated Flood Risk Assessment** • **Appendix E: Outline Drainage Strategy** • **Appendix N: Outline Landscape and Ecological Management Plan** • **Appendix O: Lighting Impact Assessment** • **Appendix S: Hydrofracture Report** • **Appendix T: Onshore Ground Investigation Interpretive Report** • **Appendix T Annex 1: Onshore Ground Investigation Factual Report** Further information is also provided in the following documents provided as **Further Environmental Information** submission:

Regulation 25 Request (letter dated 4th March 2024)	Where addressed in Environmental Statement Addendum (ESA)
sites, land, water bodies and drainage channels, the public and residential/ holiday accommodation.	• **Outline Construction Environmental Management Plan** (WHX001-FLO-CON-ENV-PLN-0010) • **Outline Bentonite Management Plan** (WHX001-FLO-CON-ENV-PLN-0012)
The potential impacts of maintenance activities requires a more precise detailed explanation/ assessment.	Clarification on the operation and maintenance of the Project are provided in **Section 5.3** of the **ES Addendum**.
Explanation of the chosen methodology for landfall and reassessment of implications on duration of works, method of working, public safety and restrictions, car parking issues, and traffic implications together with any other associated direct or indirect impacts.	Details on the chosen methodology for the landfall are provided in **Section 5.2.2** of the **ESA**. This section is supported by the following **ES Addendum** appendices: ▪ **Appendix T: Onshore Ground Investigation** ▪ **Appendix F: Coastal Geomorphology Technical Note** ▪ **Appendix Y: Cable Landfall Plan**
Updated Waste Audit Statement in compliance with the Devon County Council (DCC) Waste Management and Infrastructure SPD and Policy W4.	An updated **Waste Audit Statement** has been prepared and submitted at **Appendix 1** to an updated **Outline Construction Environmental Management Plan** (WHX001-FLO-CON-ENV-PLN-0010) which is being submitted as a standalone document.
Further site specific detail required for the ALC and soil surveys and assessment to allow for an informed appraisal of compliance with development plan policy.	A soil survey has been completed and is provided as Appendix R: Agricultural Land Classification (ALC) Soil Survey of the **ES Addendum**.
Further detail and associated impact assessment required for horizontal directional drilling (HDD) activities and likely effects of potential "frac out" (Hydrofracture) relative to the precise geological characteristics of the areas subject to HDD operations.	Further detail and assessment of the impacts associated with the HDD activities is provided in the following documents: • **Appendix S: Hydrofracture Report of the ES Addendum** • **Appendix T: Onshore Ground Investigation of the ES Addendum** • **Outline Bentonite Management Plan** (WHX001-FLO-CON-ENV-PLN-0012)
Submission of a Ground Investigation Report.	A **Ground Investigation Report** has been prepared and submitted under the following **ES Addendum** appendices: • **Appendix T: Onshore Ground Investigation Interpretive Report** • **Appendix T Annex 1: Onshore Ground Investigation Factual Report**

Regulation 25 Request (letter dated 4th March 2024)	Where addressed in Environmental Statement Addendum (ESA)
An assessment of impacts on hydrology and hydrogeology should be undertaken, particularly in relation to designated sites and flora/ fauna.	An assessment has been prepared and is submitted as **Appendix G: Hydrogeological Risk Assessment** of the **ES Addendum**. Further assessment is provided in **Appendix L: Petalwort Desk-Based Assessment and Survey Report** of the **ES Addendum**.
An assessment of the impacts and containment methodology (specific for Transition Joint Bays) should be assessed in detail.	Details on the chosen methodology for the landfall are provided in **Section 5.2.2** of the **ES Addendum**. This section is supported by the following **ES Addendum** appendices: ▪ **Appendix F: Coastal Geomorphology Technical Note** ▪ **Appendix Y: Cable Landfall Plan**
Proposed submission of an interim LEMP is welcomed.	An Outline Landscape and Ecological Management Plan has been prepared and submitted at **ES Addendum Appendix N**.
Update to Flood Risk Assessment and drainage assessment in accordance with responses from the Environment Agency and Lead Local Flood Authority.	A response to the Environment Agency has been prepared at submitted at **ES Addendum Appendix C**. The response is further supported by the following **ES Addendum** appendices: • **Appendix D: Updated Flood Risk Assessment** • **Appendix E: Outline Drainage Strategy**
Decommissioning impacts could benefit from further consideration in matters such as retaining the landscaping and attenuation measures associated with the substation if the substation is no longer required at the end of the project life.	Clarification on the operation and maintenance of the Project are provided in **Section 5.4** of the **ES Addendum**. An **Outline Decommissioning Programme** (WHX001-FLO-CON-ENV-PLN-0011) has been prepared and submitted as a standalone submission document.
Further information regarding likely impacts and outcomes of decommissioning.	Clarification on the operation and maintenance of the Project are provided in **Section 5.4** of the **ES Addendum**. An **Outline Decommissioning Programme** (WHX001-FLO-CON-ENV-PLN-0011) has been prepared and submitted as a standalone submission document.

18. No formal Regulation 25 letter was issued by the MMO. However, a commentary of what further information is required is provided by the MMO in their summary of comments on the Offshore Application (see **Section 2.3** below).

2.2 Responses to Onshore Application

19. Responses to the Onshore Application from statutory and non-statutory consultees were downloaded directly from the NDC planning portal. A response

to comments received from the majority of statutory consultees on the Onshore Application is provided in **Section 6** below. Responses to comments received from Natural England and the Environment Agency are addressed separately (see **Sections 2.4** and **2.5** below).

20. Many public representations, 700+, were made on the Onshore Application, these were also downloaded and reviewed. While a response to each of these comments is not being provided this review has identified several key themes and issues which are regularly raised:

- traffic and congestion
- use of the Saunton Sands car park
- the cable route
- ecological impact
- air quality concerns
- the impact on tourism in the area.

21. All of these key themes and issues echo the comments received from statutory consultees, it is therefore considered that the response to statutory consultees in this **ES Addendum** serve to provide responses.

2.3 Responses to Offshore Application

22. The responses to the Offshore Application, were collated by the MMO and provided to WCOWL in two response documents. The first was the whole Project response from Natural England (NE) (see **Section 2.4** below), the second included responses from all other statutory consultees on the Offshore Application.

23. A combined response to comments from statutory consultees (except for NE and the EA) on the Offshore Application are provided within a single document submitted as **Appendix B: The Applicant's Response to MMO Comments from Statutory Consultees** of this **ES Addendum**. This is supported by additional information submitted as annexes:

- Annex 1: Meeting Minutes
- Annex 2: Figures Showing Fish and Shellfish Impact Range
- Annex 3: Taw Crossing
- Annex 4: Noise Modelling Report Correction.

2.4 Response from Natural England

24. A single response providing comments on both the Onshore and Offshore Applications was submitted by NE. The comments were provided in a single document with comments tabulate by ES chapter, topic or receptor. A system to assign a risk to each comment that was developed by NE for responses to

applications for Nationally Significant Infrastructure Projects (NSIP) submitted under the Planning Act 2008, which the Project is not, has been used by NE in their response to the Project.

25. For ease of reference all the responses to comments from NE are provided in a single document submitted as **Appendix A: The Applicant's Response to Comments From Natural England** of this **ES Addendum**. This is supported by additional information submitted as annexes:

- Annex 1: Bathymetry and seabed features
- Annex 2: Hydrogeology Note
- Annex 3: Notable Plant Species (including Petalwort) Locations
- Annex 4: High Tide Roost Locations
- Annex 5: Chapter 20 Figures Omitted in Error from Offshore ES
- Annex 6: Onshore Designated Sites and Main Environmental Constraints
- Annex 7: National Vegetation Classification at Saunton Sands
- Annex 8: Southwest England Ornithological and Marine Mammal Aerial Survey Results
- Annex 9: Designated Sites
- Annex 10: Report to Inform Appropriate Assessment Note.

2.5 Response from the Environment Agency

26. Separate responses to the Onshore and Offshore Applications were provided by the Environment Agency (EA). However large parts of the two responses were the same, with many of the same comments raised in relation to the works at in the intertidal, at landfall, and for the Taw Estuary Crossing.

27. Responses to comments from EA are provided in a single document submitted as **Appendix C: The Applicant's Response to Comments from the Environment Agency** of this **ES Addendum**. This is supported by additional information submitted as:

- Annex 1: Flood Risk Clarification Note.

2.6 Response from the Royal Society for the Protection of Birds

28. The Royal Society for the Protection of Birds (RSPB) provided comments on the Onshore Application via a submission to NDC. No comments on the Offshore Application were received by the MMO, but the response to the Onshore ES included comments on the Offshore ES as an appendix.

29. The response to the comments on the Onshore Application are provided in Section 6. A separate response to the comments from the RSPB on the Offshore Application are provided in **Appendix AB: Response to RSPB (Offshore)** of this **ES Addendum**.

2.7 Statement of Community Consultation

30. Since the initial application submission and the formal consultation, in 2023, further work has been undertaken on the proposals in line with the consultation feedback and Regulation 25 request. Engagement has also been ongoing with both statutory and non-statutory consultees throughout this time.

31. Due to the project design developments and in response to requests from the public, the Project decided to hold a further round of consultation events. This offered the opportunity to present the design changes to the public, collect feedback and respond to queries and concerns about the plans.

32. The consultation events were advertised through numerous channels including digital, print and radio advertising, leaflet drops, the White Cross website and direct emails to key business, community and media stakeholders.

33. The public and stakeholder consultation was held across two days in May 2024.

    a. Tuesday 21st May in Braunton Parish Hall and Braunton Academy

    b. Wednesday 22nd May in North Devon Cricket Club, Instow.

34. Information boards were presented, to provide detail on the main changes to the project design and areas where further work had been conducted. This information was provided in clear concise plain English. WCOWL representatives were available to discuss these aspects of the project with the public and answer any questions they may have. The information was also made available online on the White Cross website, and in paper copies if requested.

35. In total 515 visitors attended the consultation events. Feedback forms were available and offered attendees the opportunity to provide voluntary feedback on the information presented. 112 feedback forms were gathered, and a further 24 responses received via either the designated email address or online feedback forms. The feedback emails have been collated along with the feedback forms, totalling 136 items of feedback overall.

36. Throughout the consultation events topics of interest and key comments and concerns were noted down. This information was added to the information collected through the feedback forms to provide a full understanding of the public views of the project. The top five topics which were raised through the consultation events were:

    a. Community impacts

    b. Congestion and traffic issues

    c. Onshore cable route and landfall location

d. Renewable energy support

e. Habitat and biodiversity impacts

37. As is generally expected with a proposal of this nature some members of the community have expressed discontent towards aspects of the project. Feedback from the events shows the overall sentiment across all venues is running at 66% negative sentiment (53% strongly disagree plus 13% disagree).

38. If we break sentiment down by event location it can been seen that whilst in Braunton 74% either disagree or strongly disagree with the onshore project proposal, in Instow 61% either agree or strongly agree with the onshore project proposal.

39. This shows a significant increase in support for the proposals and improvement in public perception of the project since the formal consultation representations on the council website were submitted in 2023.

40. Responses to key issues raised by members of the public have been published on here: https://whitecrossoffshorewind.com/exhibitions/whitecross-consultation-2022/faqs/.

41. Full information on the organisation of the consultation events, the materials presented and a summary of the voluntary feedback received is included within **Statement of Community Involvement** (WHX001-FLO-CON-STK-RPT-0001) provided as part of the **Further Environmental Information** submission.

Table 2.2 Consultation responses

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
Braunton Marsh Drainage Board	Response to Onshore Application 15 November 2023	Onshore ES Chapter 4: Site Selection and Assessment of Alternatives	Section 4, Table 4.1
		Onshore ES Chapter 15: Land Use	Section 6.4, Table 6.6
		Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
Braunton Parish Council	Response to Onshore Application 27 October 2023	Onshore ES Chapter 3: Policy and Legislative Context	Section 3, Table 3.1

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
		Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
		Onshore ES Chapter 21: Socio-economics, Tourism and Recreation	Section 6.10, Table 6.12
Cefas	Response to Offshore Application 17 November 2023	Offshore ES Chapter 8: Marine and Physical Processes	Appendix B, Section 2.1.12, Section 2.1.13
		Offshore ES Chapter 10: Benthic and Intertidal Ecology	Appendix B, Section 2.1.9
		Offshore ES Chapter 11: Fish and Shellfish Ecology	Appendix B, Section 2.1.10 and Section 2.1.11
		Offshore ES Chapter 12: Marine Mammal and Turtle Ecology	Appendix B, Section 2.1.22
		Offshore ES Chapter 14: Commercial Fisheries	Appendix B, Section 2.1.10
		Offshore ES Chapter 21: Noise and Vibration	Appendix B, Section 2.1.2 and Section 2.1.21
Cornish Fish Producers' Organisation	Response to Offshore Application 17 November 2023	Offshore ES Chapter 14: Commercial Fisheries	Appendix B, Section 2.1.17
Devon and Cornwall Police	Response to Onshore Application 2 October 2023	Onshore ES Chapter 5: Project Description	Section 5.1, Table 5.1
Devon and Severn Inshore Fisheries and Conservation Authority (IFCA)	Response to Offshore Application 17 November 2023	Offshore ES Chapter 5: Project Description	Appendix B, Section 2.1.16
		Offshore ES Chapter 11: Fish and Shellfish Ecology	Appendix B, Section 2.1.16
		Offshore ES Chapter 14: Commercial Fisheries	Appendix B, Section 2.1.16

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
Devon County Council	Response to Onshore Application 3 November 2023, Response to Offshore Application 17 November 2023	Onshore ES Chapter 3: Policy and Legislative Context	Section 3, Table 3.1
		Onshore ES Chapter 4: Site Selection and Assessment of Alternatives	Section 4, Table 4.1
		Onshore ES Chapter 5: Project Description	Section 5.1, Table 5.1
		Onshore ES Chapter 14: Water Resources and Flood Risk	Section 6.3, Table 6.4
		Onshore ES Chapter 17: Archaeology and Cultural Heritage	Section 6.6, Table 6.8
		Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10
		Onshore ES Chapter 21: Socio-economics, Tourism and Recreation	Section 6.10, Table 6.12
		Offshore ES Chapter 5: Project Description	Section 5.1, Table 5.1
Devon Wildlife Trust	Response to Onshore Application 3 October 2023 Response to Offshore Application 17 November 2023	Onshore ES Chapter 4: Site Selection and Assessment of Alternatives	Section 4, Table 4.1
		Onshore ES Chapter 5: Project Description	Section 5.1, Table 5.1
		Onshore ES Chapter 14: Water Resources and Flood Risk	Section 6.3, Table 6.4
		Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
		Offshore ES Chapter 10: Benthic and Intertidal Ecology	Appendix B, Section 2.2.4
		Offshore ES Chapter 12 Marine Mammal and Marine Turtle Ecology	Appendix B, Section 2.2.4
		Offshore ES Chapter 11 Fish and Shellfish	Appendix B, Section 2.2.4
		Offshore ES Chapter 13 Offshore Ornithology	Appendix B, Section 2.2.4
Environment Agency	Response to Onshore Application 15 November 2023, Response to Offshore Application 17 November 2023	Onshore ES Chapter 5: Project Description	Appendix C
		Onshore ES Chapter 12: Ground Conditions and Contamination	Appendix C
		Onshore ES Chapter 14: Water Resources and Flood Risk	Appendix C
		Offshore ES Chapter 8: Marine and Physical Processes	Appendix C
Environmental Health Officer (North Devon Council)	Response to Onshore Application 12 October 2023	Onshore ES Chapter 5: Project Description	Section 5.1, Table 5.1
		Onshore ES Chapter 12: Ground Conditions and Contamination	Section 6.1, Table 6.1
		Onshore ES Chapter 13: Air Quality	Section 6.2, Table 6.2
		Onshore ES Chapter 18: Noise and Vibration	Section 6.7, Table 6.9
		Onshore ES Chapter 22: Human Health	Section 6.11, Table 6.13
Fremington Parish Council	Response to Onshore Application 3 October 2023	Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
		Onshore ES Chapter 21: Socio-economics, Tourism and Recreation	Section 6.10, Table 6.12
Health and Safety Executive: Land Use Planning	Response to Onshore Application 1 November 2023	Onshore ES Chapter 15: Land Use	Section 6.4, Table 6.6
		Onshore ES Chapter 24: Major Accidents and Disasters	Section 6.13, Table 6.15
Heanton Punchardon Parish Council	Response to Offshore Application 17 November 2023	Onshore ES Chapter 13: Air Quality	Section 6.2, Table 6.2
		Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10
		Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Section 6.9, Table 6.11
Heritage Conservation Officer (North Devon Council)	Response to Onshore Application 30 October 2023	Onshore ES Chapter 17: Archaeology and Cultural Heritage	Section 6.6, Table 6.8
Historic England	Response to Onshore Application 13 October 2023	Onshore ES Chapter 17: Archaeology and Cultural Heritage	Section 6.6, Table 6.8
	Response to Offshore Application 17 November 2023	Offshore ES Chapter 4: Site Selection and Assessment of Alternatives	Appendix B, Section 2.1.3
		Offshore ES Chapter 5: Project Description	Appendix B, Section 2.1.3
		Offshore ES Chapter 16: Marine Archaeology and Cultural Heritage	Appendix B, Section 2.1.3
Instow Parish Council	Response to Offshore Application 17 November 2023	Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
Joint Nature Conservation Committee	Response to Offshore Application 17 November 2023	Offshore ES Chapter 12: Marine Mammal and Turtle Ecology	Appendix B, Section 2.1.8
Maritime and Coastguard Agency	Response to Offshore Application 17 November 2023	Offshore ES Chapter 15: Shipping and Navigation	Appendix B, Section 2.1.4
Marine Management Organisation	Response to Offshore Application 17 November 2023	Offshore ES Chapter 12: Marine Mammal and Turtle Ecology	Appendix B, Section 2.1.1
Ministry of Defence	Response to Offshore Application 17 November 2023	Offshore ES Chapter 5: Project Description	Appendix B, Section 2.1.6
		Offshore ES Chapter 17: Civil and Military Aviation	Appendix B, Section 2.1.6
National Federation of Fishermen's Organisations	Response to Offshore Application 17 November 2023	Offshore ES Chapter 5: Project Description	Appendix B, Section 2.1.15
		Offshore ES Chapter 11: Fish and Shellfish Ecology	Appendix B, Section 2.1.15
		Offshore ES Chapter 14: Commercial Fisheries	Appendix B, Section 2.1.15
Natural England	Single response to both Offshore Application and Onshore Application 3 November 2023	Onshore ES Chapter 16: Onshore Ecology and Ornithology	Appendix A
		Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Appendix A
		Offshore ES Chapter 8: Marine and Physical Processes	Appendix A
		Offshore ES Chapter 10: Benthic and Intertidal Ecology	Appendix A
		Offshore ES Chapter 12: Marine Mammal and Turtle Ecology	Appendix A

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
		Offshore ES Chapter 13: Offshore Ornithology	Appendix A
		Offshore ES Chapter 19: Offshore Seascape, Landscape and Visual Amenity	Appendix A
Northam Town Council	Response to Onshore Application 20 November 2023	Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
North Devon Biosphere	Response to Onshore Application 30 October 2023	Onshore ES Chapter 4: Site Selection and Assessment of Alternatives	Section 4, Table 4.1
		Onshore ES Chapter 5: Project Description	Section 5, Table 5.1
		Onshore ES Chapter 14: Water Resources and Flood Risk	Section 6.3, Table 6.4
		Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
		Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10
		Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Section 6.9, Table 6.11
		Onshore ES Chapter 21: Socio-economics, Tourism and Recreation	Section 6.10, Table 6.12
North Devon Coast Areas of Outstanding	Response to Onshore Application 26 October 2023	Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10

Consultee	Response Date	Topics covered	Where addressed in this ES Addendum
Natural Beauty		Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Section 6.9, Table 6.11
		Onshore ES Chapter 23: Climate Change	Section 6.12, Table 6.14
Royal Society for the Protection of Birds (RSPB)	Response to Onshore Application 10 November 2023	Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
	Appendix to response to Onshore Application 10 November 2023	Offshore ES Chapter 13: Offshore Ornithology	Appendix AB
The South West Coast Path Association	Response to Onshore Application 18 October 2023	Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Section 6.9, Table 6.11
Torridge District Council	Response to Onshore Application 12 October 2023	Onshore ES Chapter 3: Policy and Legislative Context	Section 3, Table 3.1
		Onshore ES Chapter 16: Onshore Ecology and Ornithology	Section 6.5, Table 6.7
		Onshore ES Chapter 19: Traffic and Transport	Section 6.8, Table 6.10
		Onshore ES Chapter 20: Onshore Landscape and Visual Amenity	Section 6.9, Table 6.11
Trinity House	Response to Offshore Application 17 November 2023	Offshore ES Chapter 15: Shipping and Navigation	Appendix B, Section 2.1.4

3. Policy and Legislative Context

42. The policy and legislative background and context for the Project was provided within Chapter 3: Policy and Legislative Context of each Environmental Statement.

43. Chapter 3: Policy and Legislative Context of Onshore Environmental Statement was supported by the following appendices:

- Appendix 3.A: North Devon and Torridge Local Plan Review
- Appendix 3.B: Braunton Parish Neighbourhood Plan Review
- Appendix 3.C: South West Marine Plans Review.

44. Chapter 3: Policy and Legislative Context of Offshore Environmental Statement was supported by the following appendices:

- Appendix 3.A: South West Marine Plans Review
- Appendix 4.B: Long List Report
- Appendix 4.C: Short List Report.

45. Comments were received from the following consultees in relation to the Policy and Legislative Context chapters, their comments and the responses are summarised in **Table 2.1** below:

- Braunton Parish Council
- Devon County Council
- Torridge District Council.

Table 3.1 Consultation responses to Chapter 3 Policy and Legislative Context

Consultee	Summary of comments	The Applicant's response
Braunton Parish Council	The response identifies a number of policies within the North Devon and Torridge Local Plan and the Braunton Neighbourhood Plan which need to be considered, and which the parish council feel the proposals are not compliant with. The response also raises queries on the application of national planning policy and of the use of the Rochdale Envelope in the assessment.	The Onshore Project is assessed in depth against policy in the **Planning and Sustainability Statement** submitted as part of the Onshore Application. And **Chapter 3: Policy and Legislative Context** of the **Onshore ES** provides further consideration of the policies in the local and neighbourhood plans in the context of environmental impact assessment. A full response to the comments raised, including an additional review of the identified policies and further clarification and sign-posting to where in the original application these policies are addressed, is provided in **Appendix V: Planning Policy Clarifications Note** of this **ES Addendum**.

Consultee	Summary of comments	The Applicant's response
		Appendix V also identifies which additional documents that form part of this package of further environmental information are also relevant to the identified policies.
Devon County Council	Although not referenced within the policy context or recognised as part of the Development Plan, the Devon Minerals Plan and Devon Waste Plan are relevant in the determination of this application.	A review of the Development Plan, the Devon Minerals Plan and Devon Waste Plan and their relevance to the Project is provided in **Appendix V: Planning Policy Clarifications Note** of this **ES Addendum**.
Torridge District Council	The council provide a summary of the Planning Considerations and a review of the principle of development in relation to the National Planning Policy Framework (NPPF) and the North Devon and Torridge District Plan (NDTLP). They note it is for the decision taker to determine whether the principle of development is acceptable and justified for its open countryside location. Torridge District Council have no further comments to make on the principle of development.	The Onshore Project is assessed in depth against policy in the **Planning and Sustainability Statement** submitted as part of the Onshore Application. And **Chapter 3: Policy and Legislative Context** of the **Onshore ES** provides further consideration of the policies in the local and neighbourhood plans in the context of environmental impact assessment. Further information is provided in **Appendix V: Planning Policy Clarifications Note** of this **ES Addendum**.

4. Site Selection and Assessment of Alternatives

46. The description of process undertaken for the site selection and the assessment of those alternative options for both applications was provided within Chapter 4: Site Selection and Assessment of Alternatives of each Environmental Statement.

47. Chapter 4: Site Selection and Assessment of Alternatives of Onshore Environmental Statement was supported by the following appendices:

- Appendix 4.A: Area of Search
- Appendix 4.B: Long List Report
- Appendix 4.C: Short List Report.

48. Chapter 4: Site Selection and Assessment of Alternatives of Offshore Environmental Statement was supported by the following appendices:

- Appendix 4.A: Area of Search
- Appendix 4.B: Long List Report
- Appendix 4.C: Short List Report.

49. Comments were received from the following consultees in relation to the Site Selection and Assessment of Alternatives chapters, their comments and the responses are summarised in **Table 4.1** below:

- Braunton Marsh Drainage Board
- Cefas (see **Appendix B** for comments and responses)
- Devon and Cornwall Police
- Devon County Council
- Devon Wildlife Trust
- Environment Agency (see **Appendix C** for comments and responses)
- Historic England (see **Appendix B** for comments and responses)
- North Devon Biosphere.

Table 4.1 Consultation responses to Chapter 4 Site Selection and Assessment of Alternatives

Consultee	Summary of comments	The Applicant's response
Braunton Marsh Drainage Board	The drainage board would like to see an alternative route taken to avoid damage to the Marshes and the wildlife that inhabits it. They believe there are better ways for the cable to be laid towards Yelland, via Crow Point and straight across to Yelland.	The cable route assessment process has balanced various environmental, technical and commercial aspects, and the route selection decision has been based on stakeholder consultation feedback. Over twenty different onshore cable routes have been assessed along a significant length of the North Devon Coast.

Consultee	Summary of comments	The Applicant's response
		Some of these routes were ruled out for a variety of reasons including engineering risks, significant access issues due to the constrained local road network, presence of large residential areas and the need to reduce as much as possible direct impacts on environmentally designated areas. The selected cable route avoids significant residential areas and mitigates the potential impacts to the Braunton Burrows Special Area of Conservation (SAC) by using a trenchless technique to install the cable underground without disturbing the surface. The remainder of the route will travel outside of the SAC and other identified Sites of Special Scientific Interest (SSSI) towards the Taw Estuary. Although a route up the Taw Torridge Estuary may appear to be a better solution, this has been investigated by the project and is not a viable route for several reasons. These include; • The estuary is protected as a SSSI, a Marine Conservation Zone (below mean high water springs) and is also designated as a Shellfish Water Protected Area; • Laying the cable on the surface of the estuary bed would result in significant navigational health and safety issues due to the requirement for additional rock protection to be laid over the cable to a height of 1.5 meters. This would reduce the draft available for vessels and impact the estuarine processes such

Consultee	Summary of comments	The Applicant's response
		as the movement of sediment; • Due to the dynamic nature of the Taw Torridge estuary and geomorphology the cable would need to be buried very deep within the estuary bed to avoid it becoming exposed. This would cause a significant level of damage to the estuary and have knock on effects for the geomorphology of the wider area; and • Drilling / boring under the estuary bed from outside the estuary to the substation would not be technically feasible. The consideration of alternative cable routes is presented in **Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum** and in **Chapter 4: Site Selection and Assessment of Alternatives** of the **Onshore ES**.
Devon and Cornwall Police	Police Liaison make general security recommendations from a designing out crime and anti-social behaviour perspective, with emphasis on the Project design having robust physical security measures, particularly at the substation.	WCOWL acknowledges these comments and will consider them within the security, lighting and landscaping elements of the detailed design. The recommendation for inclusion of appropriate security fencing and CCTV at the proposed substation, including during the construction phase, is also noted.
Devon County Council	Finally, it is recommended that the Local Planning Authority considers the wider grid capacity in Northern Devon at a strategic level. This is to ensure that the UK and Northern Devon can gain maximum benefit from both increased low carbon power	Whilst recognising that this comment was addressed at NDC WCOWL would highlight that decisions around grid capacity are taken at a national level by the Electricity System Operator (ESO) in consultation with national government, Ofgem and other stakeholders.

Consultee	Summary of comments	The Applicant's response
	generation and gains in economic impact, particularly locally.	The consideration of alternative cable routes is presented in **Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum** and in **Chapter 4: Site Selection and Assessment of Alternatives** of the **Onshore ES**.
Devon Wildlife Trust	Devon Wildlife Trust (DWT) raise concerns about the proposed cable route which passes through several areas which have been afforded the highest level of protection for nature conservation, including Braunton Burrows Special Area of Conversation (SAC)/Site of Special Scientific Interest (SSSI) and Taw-Torridge Estuary SSSI. They state that an alternative route which avoids sensitive habitats and areas of highest designation should be considered and assessed, such as the route selected by the Atlantic Array.	The cable route assessment process is presented in **Chapter 4: Site Selection and Assessment** of Alternatives of the **Onshore ES**. This has balanced various environmental, technical and commercial aspects, and the route selection decision has been based on stakeholder consultation feedback. Over twenty different onshore cable routes have been assessed along a significant length of the North Devon Coast. Some of these routes were ruled out for a variety of reasons including engineering risks, significant access issues due to the constrained local road network, presence of large residential areas and the need to reduce as much as possible direct impacts on environmentally designated areas. The selected cable route avoids significant residential areas and mitigates the potential impacts to the Braunton Burrows Special Area of Conversation (SAC)/Site of Special Scientific Interest (SSSI) and Taw-Torridge Estuary SSSI by using a trenchless technique to install the cable underground without disturbing the surface of the protected areas. The remainder of the route will travel outside of the SAC and other identified Sites of Special Scientific Interest (SSSI) towards the Taw Estuary.

Consultee	Summary of comments	The Applicant's response
		A summary and further clarification of the results of this assessment are presented in **Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum**.
Devon Wildlife Trust	Devon Wildlife Trust (DWT) raise concerns the proposed cable passes through several areas which have been afforded protection for nature conservation, including Braunton Burrows Special Area of Conversation (SAC)/Site of Special Scientific Interest (SSSI) and Taw-Torridge Estuary SSSI. DWT raises objection on the route selection and the likely impact on these designations, with ongoing need for maintenance and replacement requiring clear justification and assessment of alternative routes and identified Imperative Reasons of Overriding Public Interest. Impacts caused by cable installation and the associated access routes have the potential to result in adverse impacts to hydrologically sensitive habitats. An alternative route which avoids sensitive habitats and designations should be considered and formally assessed e.g. the route selected by the Atlantic Array (with extension to Yelland) as previously suggested by DWT and considered through the 'south' route option by the applicant.	The cable route assessment process has balanced various environmental, technical and commercial aspects and the route selection decision has been based on stakeholder consultation feedback. Over twenty different onshore cable routes were assessed along a significant length of the North Devon Coast. Some of these routes were ruled out for a variety of reasons including engineering risks, significant access issues due to the constrained local road network, presence of large residential areas and the need to reduce as much as possible direct impacts on environmentally designated areas. The selected cable route has been designed and amended to avoid significant residential areas and mitigates the potential direct impacts to the Braunton Burrows Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) and Taw Torridge Estuary SSSI habitat features. The remainder of the route will travel outside of the SAC and other identified SSSI towards the Taw Estuary. WCOWL acknowledges the potential for temporary impacts to habitats along the cable route. Although a route up the Taw Torridge Estuary may appear to be a better solution, this has been investigated by the Project and is not a viable route for several reasons. These include:

Consultee	Summary of comments	The Applicant's response
		• The estuary is protected as a SSSI, a Marine Conservation Zone (below mean high water springs) and is also designated as a Shellfish Water Protected Area; • Laying the cable on the surface of the estuary bed would result in significant navigational health and safety issues due to the requirement for additional rock protection to be laid over the cable to a height of 1.5 meters. This would reduce the draft available for vessels and impact the estuarine processes such as the movement of sediment; • Due to the dynamic nature of the Taw Torridge estuary and geomorphology the cable would need to be buried very deep within the estuary bed to avoid it becoming exposed. This would cause a significant level of damage to the estuary and have knock on effects for the geomorphology of the wider area; and • Drilling / boring under the estuary bed from outside the estuary to the substation would not be technically possible. The consideration of alternative cable routes is presented in **Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum** and in **Chapter 4: Site Selection and Assessment of Alternatives** of the **Onshore ES**.

Consultee	Summary of comments	The Applicant's response
		A trenchless sub-terranean drilling technique, known as horizontal directional drilling (HDD), has been selected for the SSSI sections to minimise any adverse environmental impacts on the ecology and landscape, installing the cable underground without disturbing the surface. Further details of this technique and the measures that will be implemented to mitigate any potential impacts is provided in **Appendix 5.A: Braunton Burrows and Taw Estuary Crossing Method Statement** of **Chapter 5:Project Description** of the **Onshore ES**.
Devon Wildlife Trust	While all route options pass through Bristol Channel Approaches Special Area of Conversation (SAC), the selected route crosses Braunton Burrows SAC/Site of Special Scientific Interest (SSSI), Bideford to Foreland Point MCZ and Taw-Torridge Estuary SSSI when alternative routes were feasible that would avoid these or reduce the area crossed. DWT objects to this proposed route selection and the likely impact on these designations. Braunton Burrows SAC is a unique and dynamic habitat of dunes, mudflats and sandflats; development within an SAC and the ongoing need for maintenance and subsequent replacement/removal should not be permitted unless clear justification is provided, with assessment of alternative routes and identified Imperative Reasons of Overriding Public Interest. This is particularly important given the mobile nature of the habitats for which the SAC is designated. An alternative route which avoids sensitive habitats and areas of	WCOWL acknowledges the concerns raised in relation to the Braunton Burrows SAC. However, following assessment set out in the ES, it has been determined that there will be no long-term impact on the Braunton Burrows SAC and SSSI or the Taw-Torridge SSSI. Undertaking a trenchless cable installation method beneath those areas of the Braunton Burrows SAC and SSSI with the most important and sensitive features (dunes) will ensure these features are protected and therefore that there are no long-term impacts. As assessed in the Offshore ES the impacts from the construction of the offshore export cable through the intertidal mudflats and sandflats that are also features of the Braunton Burrows SAC and SSSI are temporary and short-term with these features expected to recover within a very short period. WCOWL acknowledges the comment regarding the need for a strategic and coordinated approach to cable routing. The project is however, outside the scope of the National Grid HNDR

Consultee	Summary of comments	The Applicant's response
	highest designation should be considered and formally assessed e.g., the route selected by the Atlantic Array (extended to Yelland sub-station) as previously suggested by DWT and considered through the 'south' route option by the applicant. With the proposed expansion of offshore floating wind development in the Celtic Sea, together with other renewable energy projects such as XLinks seeking to bring cables ashore in North Devon, it is essential that a strategic and coordinated approach is taken by the Crown Estate, the National Grid and renewable energy developers to cable routing. We strongly recommend a strategic masterplan approach is developed under the auspices of National Significant Infrastructure Planning. This would help to mitigate the cumulative impacts of the multiplicity of forthcoming applications, each with associated cabling requirements.	and is not an NSIP, and as a test and demonstration project it is important that it is delivered first and ahead of the leasing round 5 projects.
North Devon Biosphere	The route taken for the landfall means that the cable is coming ashore through a Marine Conservation Zone (Foreland to Bideford) and through the Braunton Burrows SSSI and SAC and then crosses beneath the Taw Torridge SSSI. This indicates that the choice and landfall and route to the national grid connection and indeed the offer of connection at Yelland presents a risk to the internationally important assets of the area. In the hierarchy for site selection on page 10 of chapter 4 of the statement, this is clear breach of the developer's own sated principles.	The consideration of the grid connection point is presented in **Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum** and in **Chapter 4: Site Selection and Assessment of Alternatives** of the **Onshore ES**.
	Whilst we recognise that Yelland was the most economic connection	The consideration of the grid connection point is presented in

Consultee	Summary of comments	The Applicant's response
	being offered to the developer for the project at the time, there could be economies of coordinating with infrastructure connections anticipated for Alverdiscott as a connection site and considerably reduce the expense and environmental risk.	**Appendix Z: Onshore Cable Route Assessment Summary** of this **ES Addendum** and in **Chapter 4: Site Selection and Assessment of Alternatives** of the **Onshore ES**.

5. Project Description

50. The description of development for both applications was provided within Chapter 5: Project Description of each Environmental Statement.

51. This section provides a response to comments received from statutory consultees in relation to the Project Description, and then outlines the changes that have been made post-submission in response to the comments received.

5.1.1 Response to comments on the Project Description

52. Chapter 5: Project Description of Onshore Environmental Statement was supported by the following appendices:

- Appendix 5.A: Taw Estuary and Braunton Burrows Crossing Method Statement
- Appendix 5.B: Outline Construction Environmental Management Plan (including Waste Audit Statement)
- Appendix 5.C: Outline Drainage Strategy
- Appendix 5.D: Onshore Export Cable Alignment Sheets
- Appendix 5.E: Onshore Substation Indicative Designs
- Appendix 5.F: Project Parameters Table
- Appendix 5.G: Crossing Schedule.

53. Chapter 5: Project Description of Offshore Environmental Statement was supported by the following appendices:

- Appendix 5.A: Outline Construction Environmental Management Plan
- Appendix 5.B: Taw Estuary Crossing Method Statement.

54. Comments were received from the following consultees in relation to the Project Description chapters, their comments and the responses are summarised in **Table 5.1** below:

- Devon and Cornwall Police
- Devon County Council
- Devon and Severn IFCA (see **Appendix B** for comments and responses)

- Devon Wildlife Trust
- Environment Agency (see **Appendix C** for comments and responses)
- Environmental Health Officer (North Devon Council)
- Fremington Parish Council
- Historic England (see **Appendix B** for comments and responses)
- National Federation of Fishermen's Organisations (see **Appendix B** for comments and responses)
- Ministry of Defence (see **Appendix B** for comments and responses)
- North Devon Biosphere.

Table 5.1 Consultation responses to Chapter 5 Project Description

Consultee	Summary of comments	The Applicant's response
Devon and Cornwall Police	The Project doesn't look to be a Critical National Infrastructure (CNI) candidate so only comments are on general security. If it does get anointed as CNI the developer will need the specifications from National Protective Security Agency (NPSA) and ensure measures are adopted. Given the location and relative lack of legitimate natural surveillance, having robust physical security measures is imperative and the proposed inclusion of security fencing and CCTV, including during the construction phase, is supported. Any gates should match the fencing and be of a similar standard and bolstered to further delay any attack. Care must be taken that any proposed landscaping/planting buffer does not potentially create an easier opportunity to climb over the fencing. Any planting must not reduce surveillance opportunities in the long term be these natural or by CCTV, therefore, an ongoing maintenance programme must also be implemented. This site may not need that many cameras but would advise that any system has the capacity to install more cameras at a later	WCOWL acknowledges these comments and will consider them within the security, lighting and landscaping elements of the detailed design. It is noted that the Project likely doesn't meet the definition of CNI as set out by the NPSA. The recommendation for inclusion of appropriate security fencing and CCTV at the proposed substation, including during the construction phase, is also noted. WCOWL will consult with the NPSA at the detailed design stage to identify if the Project should be classified as CNI. If required appropriate security measures will be adopted and incorporated at the detailed design stage.

Consultee	Summary of comments	The Applicant's response
	stage if desired. CCTV should be designed in co-ordination with external lighting and landscaping and must have a recording format that is acceptable to the Police. Given there would likely be various sites during any construction phases, its important these sites are also suitably protected and monitored to reduce the opportunities for theft, damage and disruption.	
Devon County Council	It is noted that there will be a temporary loss of parking provision at Saunton Sands car park during the construction phase. It is understood that parking provision within this location will be reinstated following construction works. In order to ensure the impact on the local economy is minimised, it is recommended that the Local Planning Authority secure the car park's reinstatement with no net loss of spaces and that construction is kept to a minimum during main holiday periods.	WCOWL acknowledges DCC's comments regarding re-instatement of the car park at Saunton Sands, further detail of the proposed works at Saunton Sands is provided in **Section 4.2** of this **ES Addendum**. WCOWL are exploring options for the provision of an alternative car park during the works as detailed in **Section 4.2** of this **ES Addendum**.
	It would be useful to understand why the quantity of material being sent off-site is that high (is there no need for additional material or is it unsuitable and a large amount of aggregates are being imported?) and whether the applicant has considered recycling materials on-site to increase the % of material reused on-site. It is considered that the use of recycled and secondary aggregates should be prioritised over land-won aggregates if material is to be imported. The applicant should be made aware that there is an existing aggregate wharf at Yelland Quay which may be a more sustainable method of	As outlined in **Chapter 5: Project Description** of the **Onshore ES** following the construction of the onshore export cable the cable corridor will be reinstated with no permanent above ground infrastructure. Therefore, all materials imported for the temporary haul road, construction compounds and other working areas, as well as excess excavated material from the trenches will need to be removed from site. At this stage the waste storage and disposal volumes provided are indicative and will be refined by WCOWL at a later stage as the detailed design progresses. The

Consultee	Summary of comments	The Applicant's response
	importing aggregates, reducing reliance on the road network.	detailed design will seek to maximise re-use and re-cycling of materials onsite. WCOWL note the comment on prioritising the use of re-cycled and secondary aggregates over land-won. This will be considered as part of the detailed design. WCOWL note the comment on the existing aggregate wharf at Yelland Quay and will consider the possible use of the wharf at the detailed design stage.
	Additionally, we would request that the following details are also addressed within the Waste Audit Statement: • The storage arrangements for each waste type to assist in the re-use of waste. • The method for auditing the waste produced, including a monitoring scheme and corrective measures if failure to meet targets occurs. • The waste disposal details, including the location and site name.	Comments are addressed in an updated **Outline Waste Audit Statement** submitted as **Annex 1** to the updated **Outline Construction Environmental Management Plan** (OCEMP) which is being submitted as a standalone document as part of the package of further environmental information.
	It is noted that a Site Waste Management Plan will be produced post-consent to address these details, as well as additional information. It is recommended a condition is attached to any consent to require the submission of this statement prior to the commencement of the development.	WCOWL are in support of the recommended planning conditions suggested by DCC.
	It is noted that the decommissioning is not included in the Waste Audit Statement, and this would be subject to a separate consenting process. It is recommended the Local Planning	Further detail on the decommissioning phase is provided in **Section 5.3** of this **ES Addendum** and in the **Outline Decommissioning Programme** which is being

Consultee	Summary of comments	The Applicant's response
	Authority secure a Waste Audit Statement for the decommissioning phase.	submitted as a standalone document as part of the package of further environmental information. WCOWL are in support of the recommended planning conditions suggested by DCC.
	It is noted that the construction management details have been considered as part of the application. It is recommended that the driving/tracking of plant and equipment to and from the trenching locations is also considered at this stage.	The access strategy for the Project is outlined in **Chapter 5: Project Description** of the **Onshore ES**. All construction plant and equipment will access the onshore export cable corridor via designated access points. Movement between work fronts will be along the onshore export cable corridor using the installed temporary haul road. There will be no driving/tracking of plant or equipment between work fronts on the public highways, access tracks or across private land (outside of the onshore export cable corridor). More detail on the management and control of construction plant and equipment is provided in the updated **Outline Construction Environmental Management Plan** (OCEMP) which is being submitted as a standalone document as part of the package of further environmental information.
	How many tonnes of concrete is required for each turbine base and where is this aggregate is coming from?	There will be no concrete in the wind turbine generators or floating substructures themselves. The Project only proposes to use concrete in the offshore environment for scour protection at the anchors of the mooring lines, around the offshore substation piles and cable protection for the inter array or export cables. Details of the requirements for these

Consultee	Summary of comments	The Applicant's response
		Project elements are provided in the table below. As scour/cable protection in the offshore environment, the Project proposes to use a combination of the below options. Certain cable crossings might be mattresses while others could be rock placement; however, this will be subject to Crossing Agreements and approvals by the other asset owners. The worst case for placement of protection has been assessed: ▪ loose rock or gravel placement ▪ concrete mattresses ▪ flow energy dissipation devices ▪ protective aprons or coverings ▪ bagged solutions. Where aggregates and/or concrete are needed, decisions on where they will be sourced will be made later into the Project's design. As soon as WCOWL begin to consider the sourcing options, we will consult with Devon County Council as they are the Minerals Authority for Devon. The expected worst-case scenario of volumes of scour/cable protection and weights of concrete for each Project element are: • Floating wind turbine generator mooring line anchors (suction anchors as worst case) - 120,637m^3 • Offshore substation platform (four suction piles) - 2,513.27m^3 • Inter-array cables - 23,040m^3

Consultee	Summary of comments	The Applicant's response
		• Offshore export cable - 150,720m^3 / 25,920Te for concrete mattresses.
Devon Wildlife Trust	A proposed access route is located directly to the north of Horsey Island County Wildlife Site (CWS). The impact of the significant increase in traffic directly adjacent to the CWS does not appear to have been considered within the assessment. This information is required prior to considering an application for this site.	As set out in **Chapter 5: Project Description** of the **Onshore ES**, the privately owned Toll Road will only be used by light vehicles and 4x4 during the early and enabling works to allow access along this section of the onshore export cable corridor before the construction of the temporary haul road. During the main phase of the onshore construction this access will only be used by light vehicles and 4x4 in case of emergencies. No Heavy Goods Vehicle (HGV) would be permitted to use this route. An assessment of the impacts from forecast construction traffic along Link 11 (Vellator Way to Sandy Lane) was undertaken and is presented in **Chapter 22: Traffic and Transport** of the **Onshore ES**. The assessment identified no significant impacts to Link 11 during any phase of the Project. The Toll Road is one of a number of access routes served by Link 11, therefore as a very conservative worst case the assessment of impacts to Link 11 can be applied to the Toll Road. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. This includes measures to control the HGV routes.
	The report states that 'there will be no requirement for ongoing maintenance of the operational	Further detail on the operation and maintenance phase is

Consultee	Summary of comments	The Applicant's response
	Onshore Export Cables'. Robust justification is required in order to demonstrate why the cable could never require maintenance. Alternatively, assessment of the potential impact of maintenance requirements to the underground cable is required in order to undertake appropriate assessment of the potential impact of the scheme.	provided in **Section 5.3** of this **ES Addendum**.
	The substantial range of impacts on protected sites, habitats and species will be repeated during the decommissioning phase of the scheme. The assessment states that decommissioning would be required after 50 years and is anticipated to last 18 months. Impacts of the scale and duration associated with the construction phase of the scheme are likely to cause residual impacts for a significant time period.	Further detail on the decommissioning phase is provided in **Section 5.4** of this **ES Addendum** and in the **Outline Decommissioning Programme** which is being submitted as a standalone document as part of the package of further environmental information.
	Devon Wildlife Trust (DWT) raise concerns the proposed cable passes through several areas which have been afforded protection for nature conservation, including Braunton Burrows Special Area of Conversation (SAC)/Site of Special Scientific Interest (SSSI) and Taw-Torridge Estuary SSSI. DWT raises objection on the route selection and the likely impact on these designations, with ongoing need for maintenance and replacement requiring clear justification and assessment of alternative routes and identified Imperative Reasons of Overriding Public Interest. Impacts caused by cable installation and the associated access routes have the potential to result in adverse impacts to hydrologically sensitive habitats. The report states that 'The SAC/SSSI interest features will be	A trenchless sub-terranean drilling technique, known as Horizontal Directional Drilling (HDD), has been selected for the SSSI sections to minimise any adverse environmental impacts on the ecology and landscape, installing the cable underground without disturbing the surface. Further details of this technique and the measures that will be implemented to mitigate any potential impacts is provided in **Appendix 5.A: Taw Estuary and Braunton Burrows Crossing Method Statement** of **Chapter 5: Project Description** of the **Onshore ES**. WCOWL note DWT raise concerns around risk of frac-out from HDD operations. A Hydrofracture Assessment has been undertaken for the HDD cable route sections below the SSSIs, which demonstrates there is no significant risk of frac-out along

Consultee	Summary of comments	The Applicant's response
	protected by a minimum 5m stand-off from the Onshore Development Area with the exception of one short pinch point at SS463357, where the route is restricted between an existing farm building.' This pinch point in not considered within the impact assessment section of the report. Full details of the proximity of the works and impacts to the SAC/SSSI are required.	the bore profiles with the exception at the entry and exit points where the bore profile rises (above Mean High Water Springs). Further detail is provided in the **Outline Bentonite Management Plan** submitted as standalone document containing onshore mitigation / remediation measures in the unlikely event of frac-out, such as use of sandbagging and casing. With regards to the hydrologically sensitive habitats, any plans and mitigations will be outlined and managed under a Construction Environment Management Plan (CEMP) for the duration of the works, and in agreement with the Local Planning Authority (LPA). WCOWL will also be undertaking further consultation with the Lead Local Flood Authority (at Devon County Council) to ensure drainage designs are appropriate. Further information is provided in an updated **Outline Drainage Strategy** (**Appendix E**) **Flood Risk Assessment** (**Appendix D**) and **Flood Risk Clarification Note** (**Appendix C Annex 1)** submitted as part of this **ES Addendum**. Regarding future cable route maintenance activities, the Onshore Export Cables will be contained within ducting which allows the cables to be accessed from link boxes, meaning that no further ground works would be needed once the cabling infrastructure is installed. Future decommissioning is being considered and would be managed by a 'Decommissioning Programme for approval by the Local Planning Authority (LPA). The cables may be left buried in

Consultee	Summary of comments	The Applicant's response
		situ with the cable ends cut, sealed and securely buried. Alternatively, the cables may be removed by pulling them through the ducts. Impacts to Braunton Burrows have been assessed as a whole, including the short pinch point where the route is restricted between a farm building and SAC boundary.
Environmental Health Officer (North Devon Council)	Environmental Health recommend a condition for a Construction Environmental Management Plan (CEMP) to be submitted to and approved in writing by the Local Planning Authority, prior to the commencement of development. The CEMP shall incorporate mitigation measures that fully accord with the construction phase mitigation recommendations provided within Chapters 13 (Air Quality) and 18 (Noise and Vibration) of the approved Environmental Statement. In addition and as relevant, the CEMP shall include the following: a) a Construction Traffic Management Plan; b) details of any significant importation or movement of spoil and soil on site; c) details of the removal /disposal of materials from site, including soil and vegetation; d) the location and covering of stockpiles; e) details of measures to prevent mud from the site contaminating	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council. An updated **Outline Construction Environmental Management Plan** (OCEMP) has been submitted as a standalone document as part of the package of further environmental information. This will be further developed and updated post-consent and submitted to NDC for approval ahead of the commencements of any onsite works and will cover all of the points raised by Environmental Health. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. This will be further developed and updated post-consent and submitted to NDC for approval ahead of the commencements of any onsite works.

Consultee	Summary of comments	The Applicant's response
	public footpaths and roads; wheel-washing facilities; f) control of fugitive dust from demolition, earthworks and construction activities; dust suppression; g) a Construction Noise and Vibration Mitigation Plan; h) a construction site plan showing areas of the site where construction related impacts may arise including construction offices, equipment and materials compounds, ancillary facility buildings; loading and deliveries areas; i) specified on-site parking for vehicles associated with the construction works and the provision made for access thereto; j) measures relating to the findings of the approved land contamination investigation reports and for dealing with any suspected land contamination encountered during development works; k) a point of contact (such as a Construction Liaison Officer/site manager) and details of how complaints will be addressed.	
Fremington Parish Council	The council requests no traffic to or from site at weekends of bank holidays and only between the hours of 10am and 3pm to avoid congestion on the already congested local road network. The Parish Council would question the appropriateness of vehicles travelling past the chalet properties in Instow and asks that fill material for the site is brought in by boat wherever possible.	As set out in **Chapter 5: Project Description** of the **Onshore ES** the proposed working hours for the Onshore Project would be 07:00 – 19:00 Monday to Friday and 07:00 – 13:00 on Saturday. No working is proposed on Sundays or Bank Holidays. An updated **Outline Construction Environmental Management Plan** (OCEMP) has been submitted as a standalone document as part of

Consultee	Summary of comments	The Applicant's response
		the package of further environmental information. This includes measures on the management of the construction working hours. This will be further developed and updated post-consent and submitted to NDC for approval ahead of the commencements of any onsite works. WCOWL will be liaising with the Local Planning Authority to agree the site working hours prior to any works commencing on site, which are to be outlined and managed under CEMP for the duration of the works. The intended access route shown through Instow is for the early enabling works, and emergency access during the construction phase only, and won't be utilised by any Heavy Goods Vehicles (HGVs). The proposed working hours for the Onshore Project would be 07:00 – 19:00 Monday to Friday and 07:00 – 13:00 on Saturday. No working is proposed on Sundays or Bank Holidays. Further information is provided in **Section 6.1** of the **Appendix 19.A: Transport Assessment** of the **Onshore ES**.
North Devon Biosphere	It is recognised that the applicants have chosen what is likely to be the least damaging option for installing the cables across Braunton Burrows by using a trenchless technique. We also recognise that there are 2 transatlantic cables that come ashore at Saunton Sands and cross the northern side of the Burrows. It is recognised too that the applicants propose to use only bentonite in the drilling fluid to	An assessment of the risks of bentonite breakout associated with the trenchless crossings is provided with the **Taw Estuary and Braunton Burrows Crossing Method Statement** submitted with the onshore application (**Appendix 5A** of the **Onshore ES**). The revised **Outline Construction Environmental Management Plan** (OCEMP) submitted as part of the further environmental

Consultee	Summary of comments	The Applicant's response
	avoid any risk of contaminants from the trenchless process. However, it is not obvious from the text is what happens to the volume of spoil removed from drilling arisings. Whilst the volume removed is relatively small, (estimated at 260 m3 for each of the Burrows and estuary HDD operations) the drill fluid needs to be taken into account, which, depending on the recovery technique or otherwise can double the volume. This remains an outstanding issue.	information includes an **Outline Bentonite Management Plan** detailing the management practices should a bentonite breakout occur, the drilling fluids system, material volumes, and disposal methodology. Further detail on disposal is provided within an updated **Outline Waste Audit Statement** submitted as **Annex 1** to the updated **Outline Construction Environmental Management Plan** (OCEMP) which is being submitted as a standalone document as part of the package of further environmental information.

5.2 Post-submission design evolution

55. This section outlines the changes to the Project that have been made following the consultations, taking account of feedback from Statutory Consultees, public representations, discussions with landowners, and also the results of surveys and site investigations that were completed after the submission of the applications for the Project.

5.2.1 Construction Programme

56. Following submission of the Offshore and Onshore Applications further refinement has been undertaken to the project programme as part of the pre-front end engineering and design (Pre-FEED). The revised programme is presented below as **Figure 5.1**, and the changes summarised below.

57. The start of construction has been delayed due to delays incurred during the project's development phase related to securing the project consent and supply chain availability.

5.2.1.1 Offshore Construction

58. As outlined in **Section 5.8.2** of **Chapter 5: Project Description** of the **Offshore ES** the first phase of the offshore construction will be undertaken offsite, in the sheltered waters of a suitable port/harbour, with the assembly of the floating substructures. In the following phase WTG integration could occur at the same location, or the substructure could be launched and towed to another location for integration of the WTGs onto the floating substructures.

59. Some or all of these activities may require a separate Marine Licence under the MCAA 2009, and this will be determined, in consultation with the MMO, following the detailed design. These works will commence in 2028 ahead of the last phase of onsite offshore construction in 2029.

60. The onsite offshore construction will now commence in 2028, a delay of 1-2 years against the indicative offshore construction programme provided in **Section 5.8.1** of **Chapter 5: Project Description** of the **Offshore ES**. All onsite offshore construction activities will be undertaken during the calmer months of spring/summer when conditions offshore are more suited to construction activities. The first activity will be installation of the offshore substation in Q2 2028, followed by the installation of the offshore export cable and pre-lay of the anchors and moorings in Q3 2028.

61. The completion of the installation of the offshore export cable has been programmed so that it coincides with Phase 5: Intertidal and Upper Foreshore Cable Installation of the landfall works (see **Section 5.2.2** below). The offshore and onshore export cables will then be jointed in the TJB in Q4 2028 as the final activity of landfall Phase 6: Onshore Cable Pull.

62. The main change post-submission to the onsite offshore construction programme is that the construction activities within the Windfarm Site will now be split over two construction seasons. It is now proposed that during the following spring/summer (2029) the floating WTG, which will have been assembled and integrated offsite, will be towed to the Windfarm Site for installation (i.e., from Q2 2029). The final commissioning of the WTGs will then be undertaken to be completed ready for first power at the start of Q4 2029.

63. The original indicative offshore project construction programme also had all the onsite offshore construction being undertaken in Spring/Summer, with the installation of the offshore export cable in 2026 and all construction activities within the Windfarm Site in 2027. Therefore, as the works will be undertaken at the same time of year it is considered that the delay to the start of the offshore construction, and further refinement of the programme undertaken post-submission, will not materially alter the assessments within the **Offshore ES**, as these activities will still be undertaken at the same times of year.

64. Further any changes as a result of spreading more of the onsite offshore construction over two seasons, rather than the majority being completed in a single Spring/Summer, is also not considered to materially alter the assessment within the **Offshore ES**. As while there will be an increase in the duration of construction within the Windfarm Site, there will also be an accompanying reduction in their intensity by spreading them over two years. As an example, vessels associated with the anchor and mooring pre-lay will now not be operating

at the same time as those installing the floating WTG, as these activities will take place in different years.

65. The assessment of construction phase impacts in **Chapter 14: Commercial Fisheries** included assessments of impacts because of reduced access to, or exclusion from established fishing grounds (**Section 14.5.1**), increased pressure on adjacent grounds (**Section 14.5.2**), interference with fishing activities (**Section 14.5.4**) and impacts on commercially exploited fish and shellfish species (**Section 14.5.6**). These assessments used as a worst-case scenario a duration of 12-24 months for works in the Windfarm Site and 12 months for offshore export cable corridor. Therefore, the impacts from the revised offshore construction programme will be similar to the worst-case scenarios used in the **Offshore ES**.

66. The construction phase impacts assessed within **Chapter 15: Shipping and Navigation** of the **Offshore ES** include assessments of the risk of both allision (**Section 15.5.3**) and collision (**Section 15.5.4**). The frequency of occurrence is deemed to be **unlikely** for allision and **extremely unlikely** for collision, therefore it is considered that the changes to the programme with an increased duration but decreased intensity of offshore construction will not alter these assessments. And that the original conclusion of **moderate** significance for allision and **minor** significance collision, which are both **not significant** in Environmental Impact Assessment (EIA) terms, remain.

5.2.1.2 Onshore Construction

67. The start of the onshore construction has also been delayed by 2 years with a new start date September 2027 for the first phase of the works at landfall (see also **Section 5.2.2** below), and for the early/enabling works for the onshore substation. The start of the onshore export cable installation is now programmed for Q3 2027 with the enabling and early works being completed first from October 2027 to February 2028.

68. The main phase of the onshore export cable installation works will then commence in March 2028 following the description and sequence as described in **Section 5.6.3** of **Chapter 5: Project Description** of the **Onshore ES**. The final phase of the installation of the onshore export cable will be the pull of the cable through the already installed ducting beneath Braunton Burrows/Saunton Sands Golf Course (Phase 6: Onshore Cable Pull of **Section 5.2.2** below).

69. The main changes to the onshore construction programme are the timing of the crossing of the River Taw Estuary and the refinement of the works at landfall. The River Taw Estuary crossing was originally programmed to be completed after the crossing of Braunton Burrows/Saunton Golf Course, with construction starting in Q4 2026 and ending Q2 2027. This was to provide flexibility in the

final design and potentially allow for the same drill rig and equipment to be used for each crossing. The River Taw Estuary crossing will now be undertaken Q1-Q3 2028 alongside the installation of the onshore export cable, providing additional mitigation for the potential impacts on wintering birds along the Taw/Torridge Estuary Site of Special Scientific Interest (SSSI), see below for further information on assessment of impacts on wintering birds following the change to the onshore construction programme.

70. The bringing forward of the River Taw Estuary crossing also allows the overall onshore construction programme to be reduced with the installation of the onshore export cable completed within a single year, with reinstatement to be completed by November 2028. Although as outlined in **Appendix N: Outline Landscape and Ecological Management Plan** there will be monitoring and maintenance for a period of up to 5 years to ensure the successful establishment of the replacement trees and hedgerows planted as part of the landscape mitigation works.

71. A description of the revised works at landfall, including the timing of each phase, is provided in **Section 5.2.2** below.

72. The construction of the onshore substation will be completed by the end of 2028, with the installation and testing of the electrical equipment undertaken in Q1/Q2 of 2029 ahead of first power at the end of 2029.

73. It is considered that the changes and refinement to the onshore construction programme, including the reduction in the total duration and completion of the installation of the onshore export cable within a single year, will not materially alter the assessments within the **Onshore ES**. The early/enabling works will still be completed during Autumn/Winter, with the main onshore construction activities undertaken in Spring/Summer, and reinstatement completed the following Autumn. The standard working hours for the Onshore Project, Monday to Friday 07.00-19.00, Saturday 07.00-13.00, no working on Sunday or Bank Holidays, remain unchanged.

74. The duration of construction activities identified in the worst-case scenario used in the assessments in **Chapter 16: Onshore Ecology and Ornithology** (**Table 16.9**) of the **Onshore ES** are consistent with those for the revised onshore construction programme. In addition, none of the embedded and additional mitigation measures, as outlined in **Tables 16.10** and **16.11**, will be altered by the changes and refinements to the onshore construction programme.

75. The only key change noted in the programme, and of influence within the assessment is regarding the revised Taw Estuary Crossing trenchless works. Previously due to programme constraints the Project could not avoid work taking place in the winter period. The key impact being on wintering birds of the Taw-

Torridge Estuary SSSI, e.g. lapwing. As a result the Project proposed provision of mitigation in the form of enhancement of high tide roosting and foraging habitat in nearby fields. However, with the proposed revision to the construction programme these works would take place partly in the latter part of the wintering period (Q1) but mainly across Q2 and Q3 (summer). This would result in a reduction in the potential for disturbance to wintering birds. There would be no additional impact in relation to summer (breeding birds) due to the worst-case scenario assessment and the results of the breeding bird surveys (and the assessment conclusions). The Applicant, however, intends to continue to implement the Approach to Lapwing Mitigation (as outlined in **Appendix K**).

76. A description of the works undertaken post-submission to further refine the onshore construction traffic is provided in **Section 5.2.3** below. It is considered that the changes and refinement to the onshore construction programme, together with the refinements outlined in **Section 5.2.3** will not alter the assessment of construction phase impacts as assessed in **Chapter 19: Traffic and Transport** of the **Onshore ES**.

5.2.1.3 Cumulative Impacts

77. With regard to the changing of the construction programme to works proceeding from Q3 2027 to Q4 2028 (for onshore works), changed from Q2 2025 to Q4 2027 (for offshore works), the Applicant has considered whether this impacts on the conclusions of the various onshore cumulative assessments.

78. The majority of projects considered cumulatively for topics (marine physical processes, marine water and sediment quality, benthic and intertidal ecology, land use, noise and vibration, socioeconomics, climate change) only screened in the offshore works related to the White Cross Offshore Wind Farm Project. Consequently the overlap of works and worst case assessment has already been considered in the cumulative assessment and the two would continue to overlap within the changed programme. As such there would be no change to the cumulative assessment conclusions.

79. Where other projects additional to the offshore works related to the White Cross Offshore Wind Farm Project were considered in the cumulative assessment, the cumulative assessment therefore already considers a scenario where these projects overlap. Whilst there is a potential that the changed Project programme may result in construction that may not occur at the same time as the other projects, the overlap was assumed and has been considered in the cumulative impacts assessment. Therefore no change in the cumulative impact assessment conclusions would arise, within the following chapters: ground conditions and contaminants, water resources and flood risk, onshore ecology and ornithology,

onshore archaeology and cultural heritage, traffic and transport, onshore landscape and visual impact, and human health.

5.2.1.4 In-combination (HRA) Effects

80. As noted above regarding cumulative impacts within the ES, the in-combination assessment within the RIAA has assumed a worst case where all screened in projects would overlap with the Project's construction and operation (and maintenance) phases. Therefore, with the programme change there would be no change to the conclusions within the RIAA.

WHITE CROSS

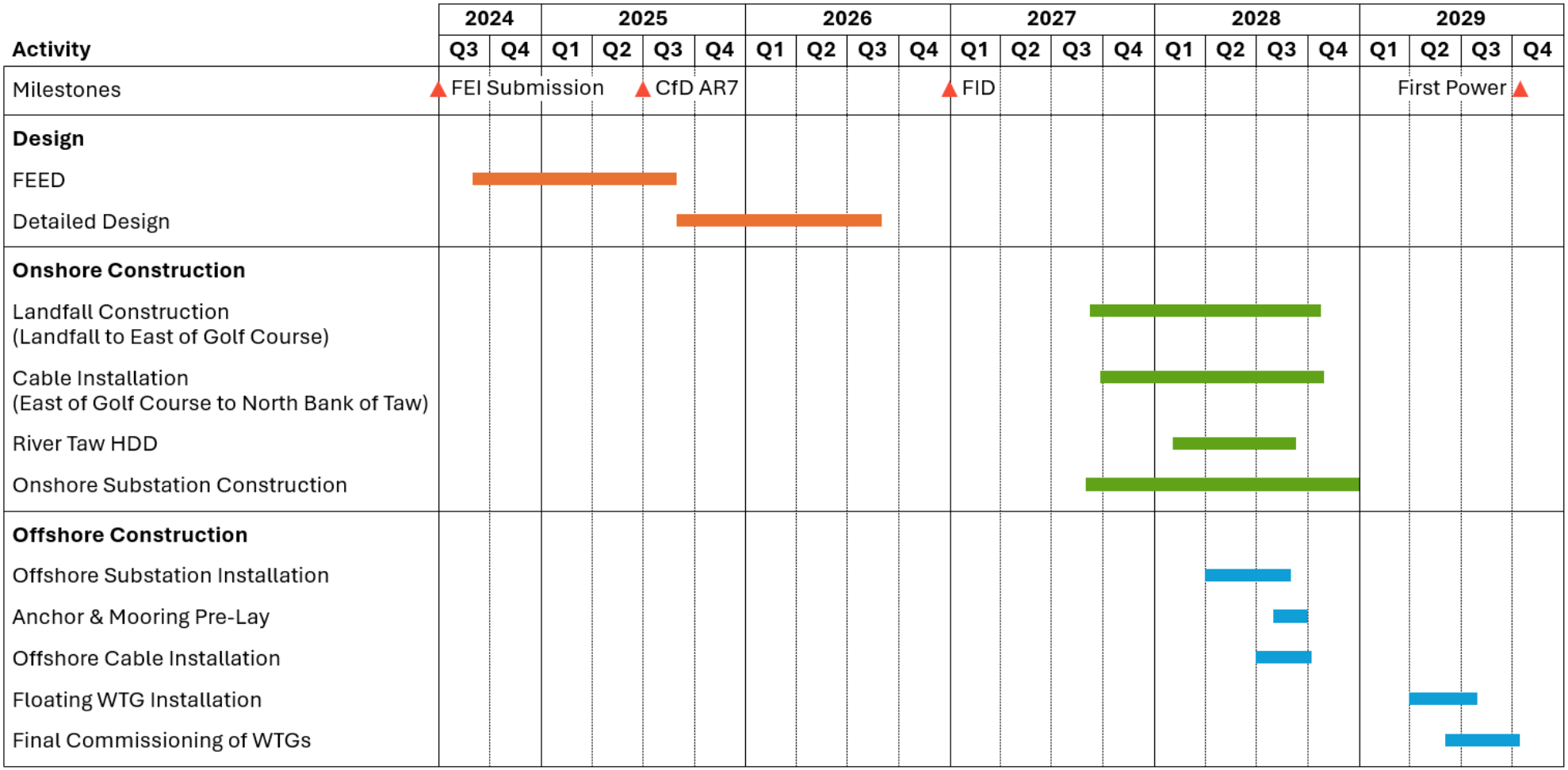


Figure 5.1 Construction programme

5.2.2 Landfall

81. The main change to the Project since the applications were submitted has been further refinement of the technique and construction methodology to be used at landfall. The following sections describe the design evolution of the landfall as set out in the Offshore Application, submitted in March 2023, the Onshore Application, submitted in August 2023, and the final design presented within this **ES Addendum**.

5.2.2.1 Offshore Application

82. The application for the offshore elements of the Project was submitted to the MMO in March 2023, and validated in April 2023. As set out in **Section 5.6** of the **Offshore ES** it covers all elements seaward of MHWS, and therefore includes the landfall up to MHWS.

83. Two options for construction at landfall were presented and assessed within the Offshore ES.

- Open cut with a trench of up to 270m from MHWS, with the cable installed and the trench backfilled;
- Trenchless technique with a HDD rig located above MHWS in the car park at Saunton Sands drilling up to 1500m to an exit point below MLWS.

84. For each receptor the impact assessment at landfall was based on assessing the project design parameters likely to result in the maximum adverse effect (i.e. the worst-case scenario) for each potential impact.

5.2.2.2 Onshore Application

85. The application for the onshore elements of the Project was submitted to NDC in August 2023, and validated in September 2023. As set out in **Section 5.3.3** of the Onshore ES it covers all elements landward of MLWS, and therefore includes the landfall up to MLWS.

86. Following submission of the Offshore ES further design work was undertaken and three options for construction at landfall were presented and assessed within the Onshore ES:

- Open cut in the intertidal zone with a short trenchless section to cross the dunes at the edge of Saunton Sands car park;
- Trenchless technique with a HDD rig located above MHWS in the car park at Saunton Sands drilling up to 860m to an intertidal exit point above MLWS;
- Trenchless technique with a HDD rig located above MHWS in the car park at Saunton Sands drilling up to 1850m to an offshore exit point below MLWS.

87. For each receptor the impact assessment at landfall was based on assessing the project design parameters likely to result in the maximum adverse effect (i.e. the worst-case scenario) for each potential impact.

5.2.2.3 Post-submission Design

88. Comments on the proposed methodology for landfall from statutory consultees and the public raised a number of concerns including request for further environmental information, including:

- Loss of access to the beach for the public during the construction
- Impacts to businesses at Saunton Sands from loss of parking spaces
- Impacts from measures to manage public safety
- Impacts to local highways from construction traffic and loss of parking spaces (including displaced parking)
- Disruption to wider tourist economy of north Devon
- Indirect impacts to Braunton Burrows SAC from trenchless techniques
- Direct impacts to Braunton Burrows SAC from works in the intertidal area (use of jack-up barge)

89. Work to refine the design at landfall continued following the submission of the **Onshore ES** and has been informed by the results of the Onshore Ground Investigation (**Appendix T: Onshore Ground Investigation Interpretative Report** of this **ES Addendum**) which were undertaken September to October 2023. This included a seismic refraction survey undertaken to understand the composition of the geology and bedrock in the intertidal area of the proposed cable landfall location. This has shown that it consists of sediment to an approximate depth of -4.5-7m above ordnance datum (AOD), which is made up of uncompacted sand (the upper layer) overlying a layer of more compacted marine deposits. Underneath these layers is 'competent rock' and bedrock. The appraisal of the crossing techniques provided as **Section 17.7** of **Appendix T** recommends that the preferred technique for the landfall would be the opencut through the intertidal.

90. Further assessment of the opencut technique is presented in **Appendix F: Coastal Geomorphology Technical Note** of this **ES Addendum**. Based on the results of the Onshore Geotechnical Investigation **Appendix F** demonstrates that the cables at the landfall can/will be buried to a sufficient depth that there will be no impact on current and future coastal erosion. And that provided the cable is buried to a depth greater than 0.5m, which can be achieved, the risk of expose over the lifetime of the Project is also considered low.

91. Based on the above information and assessments it is therefore considered that the sediment depth at the cable landfall intertidal area is suitable for open cut cable installation.

5.2.2.4 Final Design

92. The open cut option has been taken forward which will consist of the following elements:

- Transition Joint Bay (TJB) located within Saunton Sands carpark
- Open cut section through Saunton Sands carpark (approx. 120m) from the TJB to the Braunton Burrows/Saunton Golf Course trenchless crossing
- Short, approx. 40m, trenchless crossing beneath foredunes (entry pit within Saunton Sands carpark)
- Reception pit on upper foreshore (above MHWS)
- Cable laying vessel located offshore
- Open cut using displacement type cable plough to install cable from the reception pit and through the upper foreshore and intertidal

93. Further detail of the engineering aspects of the final design is presented within the **Appendix Y: Outline Cable Landfall Plan** (**OCLP**) of this **ES Addendum**.

94. As set out in **Appendix Y** the works at landfall have been split into six phases, starting in September of 2027 (see **Section 5.2.1** above for revised construction programme) as summarised in **Table 5.2** below:

Table 5.2 Phasing of Cable Landfall and Works at Saunton Sands Car Park

Phase	Year and month	Duration	Further information
Phase 1: Saunton Sands Dune Crossing	Year 1: September – December	65 days	Appendix Y Section 3.1
Phase 2: Car Park Transition Joint Bay and 40m Open Cut	Year 1: November – December	25 days	Appendix Y Section 3.2
Phase 3: Car Park 120m Open Cut	Year 2: January – February	28 days	Appendix Y Section 3.3
Phase 4: Horizontal Directional Drill under Braunton Burrows	Year 2: February – August	164 days	Appendix Y Section 3.4
Phase 5: Intertidal and Upper	Year 2: September – October	39 days	Appendix Y Section 3.5

Phase	Year and month	Duration	Further information
Foreshore Cable Installation			
Phase 6: Onshore Cable Pull	Year 2: October	12 days	Appendix Y Section 3.6

95. This phasing means that the loss of parking spaces at Saunton Sands carpark is minimised. For further information on the impacts to parking spaces at Saunton Sands and the possible mitigation measures see **Section 5.2.4** below.

5.2.2.5 Access to Saunton Sands

96. A number of the comments from statutory consultees and the pubic were around public access to Saunton Sands, and the design changes at landfall including further information on how access to the beach and carpark will be managed and maintained. As described in the **Appendix Y** the beach at Saunton Sands will remain open for public access for the duration of the landfall works.

97. General measures to mitigate the impacts from construction traffic are presented in **Appendix 19.B: Outline Construction Traffic Management Plan** (OCTMP) submitted as part of **Chapter 19: Traffic and Transport** of the **Onshore ES**. The OCTMP will be further developed pre-construction and will include detail on specific measures to mitigate the impacts at Saunton Sands car park including:

- Use of banksmen, marshals and escort vehicles to manage the movement of construction traffic into/out of and around the car park
- Scheduling of deliveries to specific days of the week, with all larger movements made outside of the peak summer season
- Timing of all vehicles movements to avoid the busier times of the day
- Phasing of works to minimise area used at any one time (see **Section 5.2.4** below)

98. Where temporary changes to the current access arrangements are required, for example if works are required to improve, repair and reinstate the existing slipway access, the Project will work with and seek advice from third sector organisations such as Disability Rights UK, or the Devon Disability Network as well as NDC and DCC to ensure the temporary changes are accessible to all.

Access from B3231 to Saunton Sands Carpark

99. Throughout the duration of the landfall works at Saunton Sands public access to the car park will be maintained. It is not anticipated that any major improvements

or upgrades are needed to the existing access from the B3231. But if any works are required the Project will work with the operators of the Saunton Sands carpark, DCC Highways and NDC to agree the scope of the works and ensure that any disruption is minimised.

100. As outlined in **Appendix 19.B Outline Construction Traffic Management Plan** (**Section 4.7**) of the **Onshore ES** highway condition surveys will be undertaken prior to the commencement of construction. Following the completion of the works the Project will repair and reinstate the access that have been impacted during the construction works.

Access to the beach at Saunton Sands

101. To access the upper foreshore and intertidal area construction plant, equipment and vehicles will use the existing slipway from the car park. During construction public access to the beach down the existing slipway will be maintained. When construction vehicles are required to access the beach vehicle movements will be managed to minimise disruption, for example limiting movement of construction vehicles to early morning and early evening when the carpark is quieter.

102. It is not anticipated that any improvements or modifications are required to the slipway, but if they are these works will be undertaken in consultation with the landowner and other users of the slipway. A pre-construction condition survey will be undertaken, and any damaged caused as a result of the Project will be repaired.

Access to the sea at Saunton Sands

103. There will be no disruption to users of the sea/surf for the duration of the majority of the works undertaken at landfall. Only when the cable is winched ashore and subsequently installed via cable plough (Phase 5 of **Table 5.2** above) will there need to be any management or control of users of the sea/surf to comply with the relevant health and safety legislation and requirements.

104. The disruption is likely to be for around 6 hours for each activity and where possible marshals, including lifeguards and safety boats in the water, will be used to ensure some level of access to the sea/surf can be maintained. Where it is not possible WCOWL will work with the business and other organisations to minimise the disruption, for example by undertaking the works at quieter times of the day or week.

5.2.2.6 Project Design Envelope

105. The Project Design Envelope (PDE) for the Onshore Project includes the option for open cut at landfall, **Section 5.4.3** of **Chapter 5: Project Description** of the **Onshore ES**. It is therefore considered that for the majority of assessment

within the **Onshore ES**, where open cut at landfall was worst-case scenario, these post-submission changes will not alter the conclusions of the assessments.

106. The assessment of construction phase impacts within **Chapter 19: Traffic and Transport** of the **Onshore ES** concluded that following the implementation of additional mitigation measures there would be no significant effects on the B3231 for severance (**Section 19.5.2**), amenity (**Section 19.5.3**), road safety (**Section 19.5.4**) or driver delay (**Section 19.5.5**). It is therefore considered that refinement of the programme for the works at landfall, including the phasing to split them over 14 months, will not alter the conclusions of these assessments.

107. **Section 21.5.3 Impact 3: Tourism and Recreation** of **Chapter 21: Socio-economics (including Tourism and Recreation)** of the **Onshore ES** drew on the assessments from the following chapters:

- **Chapter 15: Land Use**
- **Chapter 18: Noise and Vibration**
- **Chapter 19: Traffic and Transport**
- **Chapter 20: Onshore Landscape and Visual Amenity**

108. For reasons outlined above it is considered that the design changes at landfall will not alter the conclusions of the assessment that any effects are **minor** and therefore **not significant**. In addition, one of the key considerations during the refinement of the design at landfall was minimising disruption to the users and businesses at Saunton Sands, and ensuring that access to the carpark and beach was maintained throughout the duration of the construction works (see also **Section 5.2.4** below).

5.2.3 Onshore Construction Traffic

109. A key theme of the public representations submitted in response to the Onshore Application were concerns about the potential impact of construction traffic during the construction of the onshore export cable, including traffic through Braunton for the works north of the River Taw and at landfall.

110. The worst-case scenario for construction traffic presented with **Section 19.5.1** of **Chapter 19: Traffic and Transport** of the **Onshore ES** was:

- A peak for one month of 92 HGV trips per day (46 arrivals and 46 departures) along the B3231 through Braunton, with an average of 36 HGV per day; and
- A peak for one month of 91 HGV trips per day along the B3233 through Yelland, with an average of 43 per day.

111. No objections to these numbers were raised by the local highway authority Devon County Council (subject to the agreement of a final Construction Traffic Management Plan (CTMP), see **Section 6.8** below).

112. Notwithstanding, in response to the public representations, and following the further design work completed post-submission, WCOWL have been able to refine the engineering assumptions that have underpinned the traffic forecasts. This further work has included reviewing the construction programme and considering alternative construction techniques, and enhanced management measure in the CTMP.

113. This further work has demonstrates that the forecast peak HGV trips per day could be reduced by 30% (whilst not increasing the construction duration or average HGV movements) when compared to those presented in **Section 19.5.1** of **Chapter 19: Traffic and Transport** of the **Onshore ES**.

114. The final CTMP, to be produced and approved by DCC and NDC pre-construction, will detail how HGV movements will be managed and controlled within these revised forecast for peak HGV movements on B3231 through Braunton and B3233 through Yelland.

5.2.3.1 Construction Programme

115. As outlined in **Section 5.2.1** above, the programme for the construction works have been further developed and refined post-submission.

116. The use of a second HDD rig to undertake the trenchless crossing of the Taw Estuary in parallel with the trenchless crossing of Braunton Burrows/Saunton Golf Course also allows great flexibility in the programming of the works north of the River Taw. Consequently, WCOWL have been able to re-programme some tasks to start earlier, and others later, to reduce the number of activities that overlap and therefore the intensity of peak daily HGV trips.

117. The phasing of the works at landfall (see **Section 5.2.2** above) will also further reduce the peak HGV movements on the B3231 by spreading the traffic over a 14-month period. With the only works undertaken at landfall during the summer months, when total background vehicle movements on the B3231 are highest, being the trenchless crossing of Braunton Burrows/Saunton Golf Course (Phase 4 of **Table 5.2** above) which requires fewer regular deliveries of materials and equipment compared to other phases.

5.2.3.2 Haul Road

118. In response to concerns from the public and highways stakeholders, a temporary haul road was proposed as part of the main Onshore application from the B3231 towards the River Taw to remove the requirement for construction traffic to travel via the local roads (e.g. Blind Acres Lane, Sandy Lane, Moor Lane and Valator Way). However, the delivery of the stone and hardcore for the construction of the temporary haul road contributes a large proportion of the total HGV movements during construction through Braunton.

119. As the construction of this haul road (and associated stone delivery) needs to be undertaken at the start of the onshore construction phase there is limited opportunity to spread the timing of these works. However, the use of an alternative methodology for the construction of the haul road, such as a floating road, wooden bog-mats or a temporary aluminium trackway has been reviewed. These alternative techniques would significantly reduce the amount of stone required and therefore the total HGV movements.

120. The materials needed for the haul road could also be reduced through the use of low ground pressure vehicles in some areas, for example the area across the Braunton March south of the Sandy Lane crossing.

5.2.3.3 Cable Installation Measures

121. A constructability assessment, provided as part of **Appendix T: Onshore Ground Investigation Interpretative Report** of the **ES Addendum** has confirmed the ground conditions are suitable for the use of a duct plough to install the cables as an alternative to open cut. This has the advantage of reducing trench excavation by up to 80%, which in turn can lead to significant reductions in spoil handling, space requirements, backfilling, haul away and re-instatement.

122. It is anticipated that in some areas open cut will still be the preferred methodology, but that were a duct plough is used the reductions will each result in reduced HGV movements during the construction and installation of the onshore export cables.

5.2.3.4 Enhanced Management Measures

123. A range of measures to manage and mitigate the impacts from construction traffic are presented in **Appendix 19.B Outline Construction Traffic Management Plan** (**Section 2**) of the **Onshore ES**. These include measures to:

- Reduce peak HGV numbers
- Reduce peak staff vehicle movements
- Control the timing of HGV deliveries
- Control the routeing of HGVs
- Provide safe accesses from the highway
- Repair any damage to the highway attributable to the Project.

124. The OCTMP also outlines how the aims (vehicle numbers, routes, timings, etc.) will be effectively monitored and enforced. The OCTMP also include a requirement to monitor the highway condition make any repair any damage attributable to the Project.

5.2.4 Saunton Sands Car Park

125. Another area where public comments were raised, both on the applications and at public consultation events (see **Section 2.6** above), are potential effects from the temporary reduction in capacity at the Saunton Sands Car Park. Public comments raised concerns about reduced access to the beach, increases in traffic and displaced parking, loss of income for businesses based at Saunton Sands and impacts on the wider tourist economy of North Devon.

126. As summarised in **Section 5.2.2** above and detailed in **Appendix Y** the works at the landfall have been split into six phases. For each phase there will be a requirement for a construction compound and working area in the car park, with these areas fenced and/or demarcated for safety.

127. The design of each phase has been undertaken to reduce these areas as much as possible, while also retaining sufficient working area to undertake the works in an expeditious manner and thereby reduce the duration of effects. Furthermore, as much of the work as possible have been programmed so that it is undertaken outside of the key tourist season, defined as the school summer holidays from mid-July to the end of August. A review of 2022 and 2023 data from the existing car park operators has demonstrated that the car park currently operates at capacity on 8 to 10 days.

128. However, despite the reduced working areas and phasing it is recognised that the temporary loss of parking spaces at Saunton Sands may increase the number or duration of those instances when the car park is at capacity. A scheme to compensate businesses for any direct loss as a result of the Project will be implemented (see **Section 6.10.1** below).

129. Additional measures that could be considered to reduce the potential impact of the temporary loss of parking spaces are currently being explored, these include: the provision by the WCOWL of a temporary off-site solution to provide overflow parking, possibly linked to Saunton Sands via a mini-bus to create a 'park and ride'; a temporary mini-bus service provided by the Project between Braunton and Saunton Sands; or a financial contribution by the Project towards an existing, new or enhanced transport scheme such as the DCC Bus Service Improvement Plan (BSIP).

130. Early discussion with NDC and DCC on the need for and scope of any additional measures have been undertaken by WCOWL. These discussions are in the early stages and are ongoing at the point of the submission of this **ES Addendum**. It should be noted that the additional measures currently being explored are not proposed as 'mitigation measures' in EIA terms, but are rather proposed as measures to support the ongoing operation of Saunton Sands car park in response to public comments received.

131. It is expected that the delivery of any additional measures, if required, will be secured through the provision of a pre-commencement condition attached to the White Cross Onshore planning permission. This will require the additional measure(s) to be delivered and operational prior to the commencement of construction at Saunton Sands Car Park. Should a financial contribution towards the DCC Bus Service Improvement Plan be sought, this additional measure would likely be secured through the Section 106 agreement of the White Cross Onshore application. The method of securing any additional measures, as well as the length of time these measures will be in place for, will be discussed and agreed with NDC.

5.3 Operations and Maintenance Phase

132. Details of the Operations and Maintenance (O&M) Phase for both the Offshore and Onshore Projects were set out in **Chapter 5: Project Description** of both the **Offshore** and **Onshore ES**.

133. As set out above in **Table 5.1** further details and clarification on the O&M Phase for both the Offshore and Onshore Projects was requested by the regulators and statutory consultees.

134. Maintenance activities can be broadly broken down into preventative/planned maintenance activities, where work is undertaken regularly following a set schedule or programme; and corrective/unplanned maintenance which covers unexpected repairs, component replacements, retrofit campaigns and breakdowns. These can be further split into:

- Scheduled maintenance
- Refurbishment and replacement
- Unscheduled maintenance
- Emergency / special maintenance (in the event of major equipment breakdown and repairs)

135. To provide further clarification and to support the assessments several management plans have been produced in outline form and submitted as **Further Environmental Information**. These plans will remain 'live' documents and will be further defined and updated post-consent, pre-construction and throughout the O&M phase of the Project following a change management process (see **Figure 5.2**).

- **Outline Offshore Operations and Maintenance Plan** (WHX001-FLO-CON-ENV-PLN-0008)
- **Outline Project Environmental Management & Monitoring Plan** (PEMMP) (WHX001-FLO-CON-ENV-PLN-0003)

- **Outline Invasive Non-Native Species (INNS) Management Plan** (WHX001-FLO-CON-ENV-PLN-0009)
- **Outline Entanglement Monitoring and Remediation Plan (**WHX001-FLO-CON-ENV-PLN-0002)
- **Outline Underwater Noise Monitoring Plan** (OUNMP) (WHX001-FLO-CON-ENV-PLN-0006)
- **Outline Marine and Intertidal Pollution Contingency Plan** (WHX001-FLO-CON-ENV-PLN-0004)

136. These documents include outline measures to manage, monitor and remediate potential impacts during the O&M phase of the Project. As these documents will remain 'live' they will be iterative and by further developed as new information or techniques become available. It is expected that it will be a condition of the planning permission and Marine License, if approved, that these documents are updated.

137. The off-site Project Environment and Consents Team (ECT) and the Health and Safety Executive (HSE) team are responsible for:

- Managing consultation on all management and monitoring plans with the relevant consultees.
- Maintaining and updating all management and monitoring plans.
- Ensuring the relevant permissions are in place to carry out activities (if required) and ensuring the relevant notifications are made to the appropriate organisations when planning/undertaking works.
- Ensuring reporting requirements and met.
- Supporting the contractor tendering process to ensure management and mitigation requirements are efficiently communicated to suppliers proposing to perform O&M activities.

138. An onshore based WCOWL Environmental Liaison Officer will be employed during O&M activities to ensure best practice is being followed for all works.

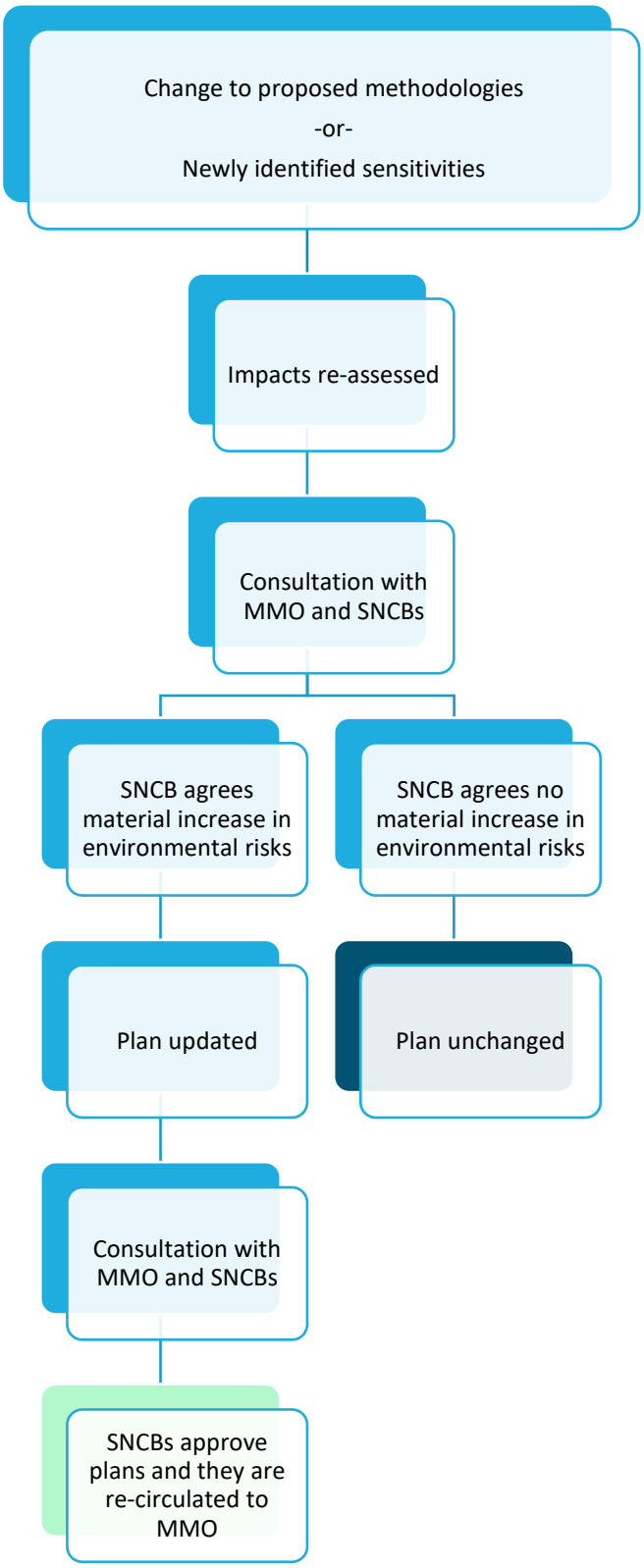


Figure 5.2 Change Management Process for updating 'live' plans

5.3.1 Offshore O&M

139. Full details of the works and activities that will be undertaken offshore are provided in **Section 5.9** of **Chapter 5: Project Description** of the **Offshore ES**. This includes a description of the scheduled maintenance activities, with their frequency. The parameters for any corrective maintenance activities, including emergency / special maintenance to repair the inter-array and/or offshore export cables are provided in **Table 5.2.1** of **Chapter 5: Project Description of the Offshore ES**.

140. Each chapter of the **Offshore ES** used the information presented within **Section 5.9** of **Chapter 5: Project Description of the Offshore ES** to formulate the realistic worst-case scenario for the assessments of effects from the O&M phase of the Project.

141. The majority of the maintenance work will take place above the water line. Whilst maintenance and repairs may require vessels such as cable-lay vessels, anchor-handlers, tugs and heavy-lift vessels, the frequency/level of these visits will be less than the worst case level of vessel activity assessed during the construction phase, so these have already been assessed by proxy. Likewise, where works are below the water line or interacting with the seabed (i.e., cable reburial, repairs or scour protection replenishment) these will all be within the worst-case envelopes assessed for construction.

142. It should be noted that there currently isn't an in-situ 'major component change out plan' (i.e., unplanned maintenance) for the operational phase for floating offshore wind (FLOW) projects. This is because currently the technology required is not available to facilitate in-situ floating to floating lifts using motion-compensated vessels. For comparison, at fixed offshore wind farms major repair of large components usually takes place on-site using jack-up vessels; however, this approach is not feasible for FLOW projects as the water depths on site are likely to be too deep for jack-up vessels. Instead, major repairs are completed by disconnecting WTGs from their moorings and laying the mooring chains on the seabed. WTGs are then towed to a port for completion of the required work at the quayside.

5.3.1.1.1 Onshore O&M Base and Port

143. As outlined in **Section 5.9.2.1** of **Chapter 5: Project Description of the Offshore ES** the strategy for the delivery of the offshore O&M, including the location of an onshore O&M base and port isn't known at this stage. And it can only be progressed post-Front End Engineering and Design (FEED) once more details on the technical specifications of the WTG and floating substructures are known.

5.3.2 Onshore O&M

5.3.2.1 Onshore Export Cable

144. There is very little requirement for any preventative maintenance for the onshore export cable, as the cable and all other infrastructure associated with it (ducts, joint bays, and link boxes) are designed to last for the operational lifetime of the Project. Therefore, there is also not expected to be a requirement for any refurbishment or replacement of the onshore export cable. There will however be periodic testing of the onshore export cable to confirm this.

145. The testing will typically be undertaken every two to five years; and engineers will access the link boxes along the entire onshore export cable route to test each section of cable. The link boxes will be located at the edges of fields and/or close to existing access and trackways, with the top of the link box sitting flush with the ground level. Other than potential strimming or cutting back of vegetation, if this has overgrown the link box cover, there will be no requirement for any construction activities. The work will be undertaken using light vehicles, such as 4x4, with access taken from the directly from the highway or existing farm access tracks.

146. Any corrective maintenance would therefore only be required in the unlikely event of a cable fault or failure. Where this to occur the section that needs to be repaired or replaced will be identified using the methodology for testing outlined above. As the onshore export cables are installed within ducts excavation is only needed to open the joint bay at each end of the failed section. The worst-case volume of soil to be excavated for two joint bays, as per the dimensions set out in **Chapter 5: Project Description** (**Table 5.3**) of the **Onshore ES**, is 144m^2. These works would typically be completed in a few days. The same method would be used for a failure of a cable as part of one of the major trenchless crossings of Braunton Burrows/Saunton Sands Golf Course of the River Taw Estuary.

147. A task and site-specific Method Statement (MS), incorporating a Health, Safety and Environment (HSE) Risk Assessment will be produced in advance of any works. This will include measure to control and manage the potential impacts from construction such as fuel spills, construction noise and dust, soil management/handling, drainage and water run-off, and reinstatement. These measures will be similar to those set out in the **Outline Construction Environmental Management Plan** (OCEMP) (WHX001-FLO-CON-ENV-PLN-0010) provided as part of the **Further Environmental Information** submission.

148. With the implementation of the embedded mitigation measures within the MS it is considered that the impacts from the repair or replacement of a section of the

onshore export cable will be no greater than those at construction, and therefore within the worst-case scenarios that have already been assessed within the **Onshore ES**.

149. The **Cable Burial Risk Assessment** (**CBRA**) (WHX001-FLO-CON-ENG-RSA-0001) which is provided as **Appendix U** explains how the optimal depth of cable burial in the intertidal will mitigate against the risk of future exposure. Although the undertaking of a full suite of geotechnical and geophysical surveys are yet to provide a complete understanding of the depth of the sand veneer and seabed sediment types across all proposed cable burial areas, currently known geotechnical information (i.e., intertidal seismic survey data presented in the Onshore Ground Investigation Interpretative Report (WHX001-FLO-CON-ENV-RPT-0001), provided as **Appendix T**) indicates there is sufficient depth of sand at the intertidal location (approx. 7-8m in depth) for opencut trenching to be used to bury the cable. This will enable a sufficient burial depth to avoid the cable becoming exposed at this location.

5.3.2.2 Onshore Substation

150. The White Cross Onshore Substation will not be manned, and day to day operations and monitoring will be undertaken remotely. There will however be regular inspections, and visits to undertake routine maintenance on the substation buildings and other physical infrastructure including the security lights and systems, and the drainage infrastructure. It is estimated that there will be weekly visits, with all work undertaken during normal working hours.

151. Preventative maintenance, such as the regular repair, maintenance and servicing of the buildings, equipment, and infrastructure would be undertaken annually. More major maintenance, such as the refurbishment and replacement of electrical equipment, would be undertaken to a set schedule or programme which would be dictated by the equipment manufacturer and supplier. This is anticipated to be undertaken on average once every four years across the operational lifetime of the Project.

152. This work would be undertaken in the summer when the wind speeds are typically lower and there is more downtime and would take up to a week to complete. The works will be undertaken onsite by engineers, primarily working inside within the substation main building or control room. If the repair or replacement of any major components, such as substation switchgear or transformers, is required then these maybe taken off-site. Should this require the use of specialist plant or equipment, such as cranes or abnormal loads, all necessary permits and permissions will be sought from relevant authorities.

5.3.2.3 Landscape Management and Biodiversity Net Gain

153. Following the completion of the onshore construction the site will be reinstated to match the conditions pre-construction, for example hedgerows removed or coppiced will be replanted or allowed to regrow, and the topsoil will be reinstated across the working area.

154. There will also be landscaping works around the White Cross Onshore Substation as part of the embedded and additional mitigation measures, including the planting of mixed deciduous woodland to the west and south of the substation to mitigate the potential visual effects (see **Section 20.4.4** of **Chapter 20: Onshore Landscape and Visual Amenity** of the **Onshore ES**).

155. To ensure these measures are successful there is a requirement for ongoing maintenance and management; these measures are set out in **Appendix N: Outline Landscape and Ecological Management Plan** of the **ES Addendum**. The works will be undertaken for a of 5 years following which the responsibility for maintenance will be returned to the landowner(s).

156. In additional to the restoration the Project has committed to the delivery of 10% Biodiversity Net Gain (BNG), which will be secured and managed for a minimum of 30 years (see **Appendix 16.A: Biodiversity Net Gain Assessment** of the **Onshore ES**). A biodiversity gain plan, setting out how the Project will achieve BNG will be submitted to NDC following approval of the planning permission.

157. All landscape and BNG maintenance activities would be carried out in accordance with relevant legislation. Maintenance staff will be aware of the legal obligations to protect nesting birds (mainly during the months of March to August) and bats which may roost against walls or trees during their active season (generally April to September inclusive but can be active in March and October in warmer weather).

5.4 Decommissioning Phase

158. The EIA for the Project has considered the decommissioning phase, where relevant, so potential impacts have been assessed within both the Onshore and Offshore ES. However as set out in **Section 5.10** of **Chapter 5: Project Description** of both the **Offshore** and **Onshore ES**, the assessment of effects from decommissioning is limited at this stage due to the uncertainty regarding the details of the final decommissioning programme.

159. At this stage of development, the potential impacts of decommissioning the Project have been assessed on the assumption that decommissioning methods will be similar or of a lesser scale than those deployed for construction. The types of impact are therefore considered likely to be comparable to those identified for the construction phase; however, the magnitude of impacts is likely to be less

than those identified for the construction phase. For example, the more significant impacts for onshore ecology relate to trenching, haul road construction, and human presence during drilling operations. Whereas, for decommissioning trenching is not required as the cabling can be removed without trenching, and the timescales involved are likely to be shorter, and could potentially be timed more easily around sensitive periods for wildlife. Accordingly, given the construction phase assessments concluded for most receptors, it is anticipated that at most, a similar assessment would apply for the decommissioning phase regardless of the final decommissioning methodologies; but in all likelihood, the significance is likely to be lower, given the factors described in the paragraph above.

160. As set out above in **Table 5.1** further details and clarification on the Decommissioning Phase for both the Offshore and Onshore Projects was requested by the regulators and statutory consultees.

161. In response to requests for clarification and further information an **Outline Decommissioning Programme** (WHX001-FLO-CON-ENV-PLN-0011) is provided in **Further Environmental Information** submission.

162. The requirement to submit a decommissioning programme for the offshore elements[1] of the Project is set out in Sections 105 to 114 of the Energy Act 2004 (as amended by the Energy Act 2008). And guidance[2], including a model framework for a decommissioning programme, has been published the former Department for Business, Energy and Industrial Strategy (BEIS) (now the Department for Energy Security and Net Zero (DESNZ).

163. There is no equivalent requirement to submit a decommissioning programme for the onshore elements of the Project or for the intertidal area[2]. However, the **Outline Decommissioning Programme** (WHX001-FLO-CON-ENV-PLN-0011) that has been submitted has been extended to cover all aspects of the project.

164. The **Outline Decommissioning Programme** (WHX001-FLO-CON-ENV-PLN-0011) provides only preliminary information on the approach to decommissioning of the offshore and onshore components of the Project based on current legislation and guidance. However, the decommissioning programme will be updated post-consent and will remain 'live' until such time as the Project enters

[1] The Energy Act 2004 does not cover the inter-tidal zone (the area of the shore between the high and low tide water marks). Therefore only those parts of the Offshore Project below MLWS are required to be covered by the Decommissioning Programme.

[2] *Decommissioning of Offshore Renewable Energy Installations Under The Energy Act 2004: Guidance notes for industry (England and Wales), March 2019*.

decommissioning; the final decommissioning programme will be compliant with the relevant requirements at the time of decommissioning

165. It is expected that it will be a condition of the Marine License, if approved, that the decommissioning programme is updated.

5.4.1 Offshore Decommissioning

166. Most of the offshore infrastructure for a FLOW project, the WTG, semi-submersible floating platforms, dynamic inter-array cable and moorings, can be completely removed and returned to port for disassembly, re-use or disposal. The impacts of these activities offshore will therefore be the reverse of construction and is therefore within the PDE of what has been assessed within the **Offshore ES**. The activities to disassemble, re-use or dispose of the offshore infrastructure will be undertaken entirely within the port, which may also be located outside of the UK, and therefore all the necessary consents and permissions required will be sought at the time of decommissioning.

167. Any mooring anchors driven or drilled into the seabed will be cut below the seabed at a level that ensures they will not create a hazard for fishing or shipping. Embedded material will be left in situ and emergent structures will be removed from site. The impacts of these activities offshore will therefore be the reverse of construction and is therefore within the PDE of what has been assessed within the **Offshore ES**.

168. The Offshore Substation Platform (OSP), if required, will also be removed from site. All the equipment above water will be removed and taken to a suitable port for disassembly, re-use or disposal. The foundations would likely be cut below the seabed at a level that ensures they will not create a hazard for fishing or shipping. If the piles can't be completely removed from the seabed measures will be employed to ensure that any sections that do remain are fully buried. It is considered that as a worst-case the impacts of these activities offshore will be the reverse of construction and is therefore within the PDE of what has been assessed within the **Offshore ES**.

169. The preferred approach for the offshore export cable(s) and the buried sections of inter-array cables is that they would be left in-situ to minimise impacts associated with their remove. But if removal was required, they would be retrieved and returned to onshore for disassembly, re-use or disposal. The techniques used, and their associated impacts (including the area of the seabed impacted) would likely be the reverse of construction and is therefore within the PDE of what has been assessed within the **Offshore ES**.

170. It is therefore considered that as a worst-case scenario the decommissioning would be the reverse of construction, with a similar sequence and programme, and involve similar types and numbers of vessels and equipment.

5.4.2 Onshore Decommissioning

171. Given the uncertainties of the final decommissioning strategy at the time of submission of the **Onshore ES** the worst-case scenario for the decommissioning that was used for most of the assessments was the reverse of construction. Although as outline above it is considered that for any assessments the magnitude of impact, and therefore the significance of effect, are likely to be less than those at construction.

172. For most of the onshore infrastructure preferred approach would be to leave it in-situ to minimise the impacts associated with their removal. The ducts, TJB, jointing bays and link boxes would all be left below buried below ground. If removal of some or all of the infrastructure was required the impacts would likely be the reverse of construction and is therefore within the PDE of what has been assessed within the **Onshore ES**.

173. The onshore export cables can also be left buried in-situ with the cable ends cut, sealed and securely buried. Alternatively, the cables can be removed by pulling them through the ducts, and then taken offsite for disassembly, re-use or disposal. If the cables are removed the TJB and each joint bay along the route would be opened, with the sections of cable pulled through. The construction methodology would be similar to that described for the repair or replacement of the onshore export cable in **Section 5.3.2.1** above. It is therefore considered that the impacts for the worst-case scenario, cable removal, are no greater than those for construction and therefore within the PDE of what has been assessed within the **Onshore ES**.

5.4.2.1 Onshore Substation

174. The decommissioning of the White Cross Onshore Substation has been subject to discussion between WCOWL, NDC and key stakeholders including the Environment Agency (EA) and Devon County Council (DCC) in their role as the Lead Local Flood Authority. This has included a commitment by WCOWL to remove the substation building, and all associated above ground infrastructure and equipment, at the end of the operational lifetime of WCOW or within 50 years, whichever is sooner. It is anticipated that there will be a specific condition attached to the onshore planning permission regarding the decommissioning of the White Cross Onshore Substation.

175. The substation buildings and any other above ground infrastructure would be demolished, with all materials taken off site for recycling or disposal in

accordance with the legislative requirements at the time. The impacts would likely be the reverse of construction and is therefore within the PDE of what has been assessed within the **Onshore ES**.

176. The landscaping, including the woodland planted to the west and south of the substation, and drainage infrastructure would be left in-situ as they will now form part of the site.

177. Any proposals for re-use of part or all of the site, whether for a similar or related purpose such as electricity transmission, distribution or generation, or a totally new use would be required to obtain the necessary planning permissions and consents. Therefore the impacts associated with any re-use of part or all of the site would be subject to assessment as part of the new application.

6. Response to comments on the Onshore Project

178. This section outlines the Applicant's responses to consultee comments on terrestrial matters on a topic-by-topic basis. Each section aims to summarise the key issues for that topic with detailed information or assessment provided within the appendices where necessary. This section contains the following topics:

- Ground Conditions and Contamination
- Air Quality
- Water Resources and Flood Risk
- Land Use
- Onshore Ecology and Ornithology
- Onshore Archaeology and Cultural Heritage
- Noise and Vibration
- Traffic and Transport
- Onshore Landscape and Visual Amenity
- Socio-economics (including Tourism and Recreation)
- Human Health.

179. The comments received covering the following topics that cover the intertidal area but which were also assessed in the Offshore Application are not covered here but are addressed below in **Section 7**:

- Marine and Coastal Processes
- Marine Water and Sediment Quality
- Benthic and Intertidal Ecology
- Marine Mammal and Marine Turtle Ecology.

6.1 Ground Conditions and Contamination

180. The assessment of effects on ground conditions and contamination are covered within Chapter 12: Ground Conditions and Contamination of Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 12.A: Geo-environmental Desk Study and Preliminary Risk Assessment

181. Comments were received from the following consultees in relation to Chapter 12, their comments and the responses are summarised in **Table 6.1** below:

- Environment Agency (see **Appendix C** for comments and responses)
- Environmental Health Officer (North Devon Council)

Table 6.1 Consultation responses to Chapter 12 Ground Conditions and Contamination

Consultee	Summary of comments	The Applicant's response
Environmental Health Officer (North Devon Council)	Environmental Health Officer accepts the findings of Chapter 12: Ground Conditions and Contamination of the Onshore ES and recommend the following conditions be included on any planning permission.	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council.
	<u>Contaminated Land Condition (Further Investigation Required)</u> Prior to the commencement of any site clearance, groundworks or construction, the local planning authority shall be provided with a Phase 2 Intrusive Investigation and Contamination Assessment Report for potential ground contamination affecting the proposed development for approval. The Phase 2 report shall detail all investigative works and sampling as well as the results of analysis and further risk assessments undertaken and highlight any unacceptable risks identified. The report shall be prepared by a suitably qualified competent person and have regard to all recommendations contained within the ES. Where contamination remediation works are identified as necessary at Phase 2, additional requirements shall be completed prior to commencing works that present a contamination risk: (a) A remediation options appraisal and proposed remediation scheme shall be submitted to the LPA for approval prior to remediation works commencing. The remediation scheme shall include a remediation method statement and details of any post remediation verification measures required.	WCWOL are supportive of a condition being imposed to undertake further contaminated land investigation prior to the commencement of any site works. WCOWL has undertaken a program of ground investigation to inform detailed design. The findings are presented within the **Appendix T: Onshore Ground Investigation Factual Report** of this **ES Addendum**. As detailed design progresses, further interpretive assessment and reporting will be undertaken post consent to further inform detailed design, and whether any remediation measures, or further additional ground investigation are required post consent to permit the development in agreement with the LPA.

Consultee	Summary of comments	The Applicant's response
	(b) Approved remediation works shall be carried out in full under a Quality Assurance scheme to demonstrate compliance with the approved methodology and established good practice. (c) A completion and validation report shall be submitted to the LPA for written approval. The report shall include details of all remediation works undertaken along with the results of any post-remedial sampling, analysis or monitoring undertaken to demonstrate that remediation has been undertaken in full accordance with the approved methodology and that the site has reached the required clean-up criteria. Where relevant, waste transfer documentation detailing waste removed from the site shall be included. (d) A certificate signed by the developer shall be submitted to the LPA confirming that the approved works have been undertaken as detailed in the completion report. for addressing the contamination is agreed upon with the LPA and relevant regulatory bodies.	
	<u>Contaminated Land (Unexpected Contamination) Condition</u> Should any suspected contamination of ground or groundwater not previously identified and addressed be discovered during development of the site, the LPA shall be contacted immediately. Site activities within that sub-phase or part thereof shall be temporarily suspended until such time as a procedure for addressing the contamination is agreed upon with the LPA and relevant regulatory bodies.	WCWOL are supportive of a condition being imposed to notify the LPA should an suspected contamination of ground or groundwater be discovered during development of the site.

6.2 Air Quality

182. The assessment of effects on air quality are covered within Chapter 13: Air Quality of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 13.A: Construction Dust and Fine Particulate Matter Assessment Methodology
- Appendix 13.B: Air Quality Assessment Traffic Data.

183. Comments were received from the following consultees in relation to Chapter 13, their comments and the responses are summarised in **Table 6.3** below:

- Environment Agency (see **Appendix C** for comments and responses)
- Environmental Health Officer (North Devon Council)
- Heanton Punchardon Parish Council

6.2.1 North Devon Council Air Quality Monitoring Data

184. A statutory Air Quality Management Area (AQMA), the North Devon AQMA No.1, was declared in 2011 within the village of Braunton, approximately 2 km east of the Onshore Project area, for exceedances of the annual mean nitrogen dioxide (NO_2) Objective relating to road traffic emissions. The data collected from the North Devon AQMA No.1 was used to inform the current baseline in **Section 13.4.1** of **Chapter 13: Air Quality** of the **Onshore ES**.

185. Recent air quality Annual Status Reports (ASRs) published by NDC3 state that the annual mean NO_2 Objective has not been exceeded anywhere in the district since 2015 and the Council were seeking to revoke the AQMA given four years of monitored compliance, including pre-Covid concentrations. The Council have recently announced that the AQMA in Braunton has been revoked, as Braunton has seen consistent improvements in air quality over the past five years4.

186. NDC undertake ambient air quality monitoring using NO_2 diffusion tubes within the now revoked North Devon AQMA No.1, which are also the closest monitoring sites to the Onshore Project area. Since the **Onshore ES** was submitted, diffusion tube monitoring data for 2022 have now been published by NDC.

[3] North Devon District Council (2023). 2023 Annual Status Report, November 2023.
[4] North Devon Council (2024). Council celebrates air quality improvement in Braunton (5 June 2024). [Online] Available at: https://www.northdevon.gov.uk/news/2024/council-celebrates-air-quality-improvement-in-braunton

Monitoring data recorded at sites within and near to North Devon AQMA No.1 is included in **Table 6.2** below.

Table 6.2 Annual mean NO_2 monitoring undertaken by North Devon Council

Site ID	Location	Site Type	Located within AQMA?	Monitored Annual Mean NO_2 Concentration (µg.m^{-3}) [A]					
				2017	2018	2019	2020	2021	2022
7	Exeter Road 3, Braunton – Parklyn	Kerbside	No	19.9	22.0	20.2**	15.9**	17.9**	17.8
9	Exeter Road 5, Braunton – Paint a Pot	Kerbside	No	36.7	36.4*	35.2	26.4**	29.2*	28.1
13	Saunton Road 1, Braunton – Field Lane	Kerbside	No	22.5	25.8	23.5	18.9**	20.0	18.6
14	Saunton Road 2, Braunton – Sharlands	Kerbside	No	18.2	21.1	18.0**	14.9**	15.9**	13.0
15	Caen Street – Salt	Kerbside	No [B]	-	-	36.1	29.3**	31.4	30.9
16	Caen Gardens, Braunton – J Benning	Kerbside	No	14.0	14.6	12.4**	10.9**	11.1	10.8
17	Chaloners Road, Braunton – Parish Hall	Kerbside	No	18.9**	26.6**	22.3	18.7**	19.8	18.2
18	The Square, Braunton – Café Bistro	Kerbside	No [B]	39.4	39.9	30.0	18.8**	20.0	19.9
19	The London Inn, Braunton	Kerbside	Yes	30.0	36.5	31.1	26.4**	27.2	26.4

Site ID	Location	Site Type	Located within AQMA?	Monitored Annual Mean NO_2 Concentration ($\mu g.m^{-3}$) [A]					
				2017	2018	2019	2020	2021	2022

Notes:
* Data capture is below 90%.
** Data capture is below 75%.
[A] The annual mean NO_2 Objective is 40 µg m^{-3}
[B] The Air Quality ASR states the site is not located within the AQMA however the grid refence coordinates situate the monitoring site adjacent to the AQMA.

187. The monitoring results included in Table 1 show that the annual mean NO_2 Objective of 40 µg m^{-3} has not been exceeded at any diffusion tube location since at least before 2017, including the diffusion tube sites located within/near the now revoked AQMA.

188. As acknowledged in **Chapter 13: Air Quality** of the **Onshore ES**, monitoring data from 2020 and 2021 should be treated with caution as the Covid-19 pandemic had an impact on traffic levels. Despite this, monitoring still indicates a declining trend in annual mean concentrations of NO_2 since at least 2017 and remain below the NO_2 air quality Objective.

189. The highest annual mean NO_2 concentration recorded in 2022 within or near to the now revoked AQMA was 30.9 µg m^{-3}, at diffusion tube site 15, which is less than 78% of the annual mean NO_2 Objective. This diffusion tube is classes as a kerbside monitoring site as it is located on a lamp post within 1 m of the junction between Caen Street and Chaloners Road (A361). This monitoring site does therefore not represent relevant residential public exposure within the area and, as air pollutant concentrations reduce with distance from the roadside, residential public exposure is likely to be lower. For context, the two other monitoring sites (both kerbside locations) situation within or near to the now revoked AQMA (sites 18 and 19) recorded NO_2 concentrations of approximately 50% and 66%, respectively, of the annual mean Objective in 2022.

190. The monitoring data recorded in 2022 in addition to the recent revocation of the North Devon AQMA No.1 in Braunton therefore further support the conclusion of the road traffic emissions assessment presented in **Chapter 13: Air Quality** of the **Onshore ES**.

Table 6.3 Consultation responses to Chapter 13 Air Quality

Consultee	Summary of comments	The Applicant's response
Environmental Health Officer (North Devon Council)	Environmental Health Officer accepts the findings of Chapter 13: Air Quality and relevant parts of Chapter 22: Human Health of the Onshore ES and recommend	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council. For further

Consultee	Summary of comments	The Applicant's response
	the following conditions be included on any planning permission.	details see response to Environmental Health Officer in **Table 5.1** of this **ES Addendum**.
Heanton Punchardon Parish Council	Heanton Punchardon Parish Council (HPPC) raised queries for further information around validity of the survey data specifically concerning the Parish, and localised traffic and landscape impacts, and requested for the consultation period to be extended for further clarification.	The assessment of the potential impacts of the Project on air quality are presented in **Chapter 13: Air Quality** of the **Onshore ES**. As outlined in **Chapter 5: Project Description** of the **Onshore ES** none of the construction of the Project will be undertaken within the boundary of Heanton Punchardon Parish. No construction traffic is forecast to travel through the village of Heanton and in the vicinity of the parish, all construction traffic would be routed via the main A361. The assessment of impacts from construction road vehicle exhaust emissions concluded that in accordance with the relevant guidance the effect of project-generated traffic emissions at human receptors is not significant (**Section 13.5.3** of the **Onshore ES**).

6.3 Water Resources and Flood Risk

191. The assessment of effects on water resources and flood risk are covered within Chapter 14: Water Resources and Flood Risk of Onshore Environmental Statement, the chapter was supported by the following appendices:

- Appendix 14.A: White Cross Geomorphology Baseline Survey
- Appendix 14.B: Water Environment Regulations Compliance Assessment
- Appendix 14.C: Flood Risk Assessment.

192. Comments were received from the following consultees in relation to Chapter 14, their comments and the responses are summarised in **Table 6.4** below:

- Environment Agency (see **Appendix C** for comments and responses)
- Devon County Council, as the Lead Local Flood Authority

- Devon Wildlife Trust
- Braunton Marsh Internal Drainage Board.

Table 6.4 Consultation responses to Chapter 14 Water Resource and Flood Risk

Consultee	Summary of comments	The Applicant's response
Devon County Council	The proposed drainage system should consider water quality in the design, for example if a vehicle needs to enter the site. Permeable paving and swales could be used to convey flows to the proposed pond, these features could provide opportunities for interception losses.	Comments are addressed in an updated **Outline Drainage Strategy** submitted as **Appendix E** to this **ES Addendum**.
	It is noted that there are two sets of model outputs; one set model an attenuation tank and the other set model a pond. The applicant should confirm whether both outputs are relevant for this proposal.	
	50% climate change is required for the modelling of the surface water drainage system. A freeboard of 300mm is required.	
	It is also noted that the applicant has referred to an existing ditch adjacent to the Tarka Trail. Confirmation is required to be provided based on the route of this ditch and its eventual outfall.	
	The applicant is reminded that Land Drainage Consent will be required for temporary or permanent works within Ordinary Watercourses.	Comments are noted. No further response is required.
Devon Wildlife Trust	Devon Wildlife Trust (DWT) raise concerns the proposed cable passes through several areas which have been afforded protection for nature conservation, including Braunton Burrows Special Area of Conversation (SAC)/Site of Special Scientific Interest (SSSI) and Taw-Torridge Estuary SSSI. DWT raises objection on the route selection and the likely impact on these designations, with ongoing need for maintenance and replacement requiring clear justification and assessment of alternative routes and identified Imperative Reasons of Overriding Public Interest. Impacts	Comments are addressed in **Appendix B: The Applicant's Response to MMO Comments from Statutory Consultees**.

Consultee	Summary of comments	The Applicant's response
	caused by cable installation and the associated access routes have the potential to result in adverse impacts to hydrologically sensitive habitats.	
North Devon Biosphere	Whist it is recognised that there are examples around the world of undergrounding cables in wetland areas, there are inherent risks associated with trenching across wetlands. These can include impacts on the hydrology of the site which is the characteristic that defines the area. For many years there has been a concern about falling water levels and reduced numbers of slacks at Braunton Burrows without any knowledge about the cause of the decline. The EIA proposal does not give any indication that risks of hydrological change have been considered.	Comments are addressed in a **Hydrogeological Risk Assessment** submitted as **Appendix G** to this **ES Addendum**. The results of the geotechnical investigations have been used to inform further hydrogeological modelling and risk assessment. It concludes that there is no risk to groundwater or sub-surface indirect impacts due to the installation and operation of the onshore export cable corridor. **Annex 2: Hydrogeological Technical Note** of **Appendix** A considers this is the context of ecological receptors and concluded no impact would occur on the receptors (and designated site features) where groundwater is a supporting or influencing factor.
Braunton Marsh Drainage Board	The drainage board would like to see an alternative route to avoid damage to the marshes themselves and the wildlife that inhibits it.	Further consultation will be undertaken with farmers occupying the marshland as detailed design and construction work plans progress, with the aim to address any specific concerns around livestock and flood risk. Any plans and mitigations will be outlined and managed under a Construction Environment Management Plan (CEMP) for the duration of the works, and in agreement with the Local Planning Authority (LPA). Additionally, WCOWL has responded to planning consultee representations received from the North Devon Biosphere and North Devon Coast Areas of Outstanding Natural Beauty separately to address their specific concerns, and further consultation is to be undertaken with the Lead Local Flood Authority (at Devon County Council) to ensure drainage designs are appropriate.

Consultee	Summary of comments	The Applicant's response
		Further information will be provided in the following **ES Addendum** appendices: • **Appendix D: Updated Flood Risk Assessment** • **Appendix E: Outline Drainage Strategy**

6.4 Land Use

193. The assessment of effects on land use are covered within Chapter 15: Land Use of Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 15.A: Public Rights of Way Strategy.

194. Comments were received from the following consultees in relation to Chapter 15, their comments and the responses are summarised in **Table 6.5** below:

- Braunton Marsh Internal Drainage Board
- Health and Safety Executive: Land Use Planning
- Torridge District Council.

Table 6.5 Consultation responses to Chapter 15 Land Use

Consultee	Summary of comments	The Applicant's response
Braunton Marsh Internal Drainage Board	The proposed cable route through Braunton Marsh would impact farmers and their ability to raise stock, in particular young animals.	The assessment of the impacts of the proposed project on agricultural land use during the construction phase of the project is provided in **Section 15.5.2** of the **Onshore ES**. Any losses or disruption during the construction, including across Braunton Marsh, will be temporary for the duration of the onshore construction only. The project has been liaising with the local landowners to ensure appropriate compensation is arranged for to account for any losses during construction. Further consultation will be undertaken with farmers occupying the marshland as detailed design and construction work plans progress, with the aim to address

Consultee	Summary of comments	The Applicant's response
		any specific concerns around livestock. Any plans and mitigations will be outlined and managed under a Construction Environment Management Plan (CEMP) for the duration of the works, and in agreement with the Local Planning Authority (LPA). The assessment of the impacts of the proposed project on agricultural land use during the operations and maintenance phase of the project is provided in **Section 15.6.2** of the **Onshore ES**. The majority of the project infrastructure will be installed below ground to an indicative depth of 1.9m and following reinstatement normal farming activities would be able to continue. The only permanent above/at ground infrastructure will be the onshore substation and a maximum of 30 link boxes (maximum 3m x 3m). Private agreements (providing financial compensation) will be sought between the project and relevant landowners / occupiers regarding any permanent loss of land incurred as a direct consequence of the operation of the Onshore Project. Routine maintenance across the onshore cable route will consist of inspections and visits to test the cables at the link boxes. This visits will be at most annual, the project will liaise with all landowners to mitigate any impacts, for example to agree the timings of the works to avoid disruption to normal farming activities. Further detail is provided in **Section 5.3** of this **ES Addendum**.
Health and Safety Executive: Land Use Planning	Wind turbines and the offshore windfarm electricity export cable are usually not a relevant development in relation to land-use planning in the vicinity of major hazard sites and major accident hazard pipelines.	A search was undertaken for the cable route corridor during November 2023 using the HSE Land Use Planning Web Application, to check whether the Onshore Development Area falls within any

Consultee	Summary of comments	The Applicant's response
	This is because they do not, in themselves, involve the introduction of people into the area. However, if the proposed development is located within a safeguarding zone for a HSE licensed explosives site then the HSE's Explosives Inspectorate should be contacted.	explosives site zone, major hazard site or major accident hazard pipeline. The outcome of the search identified a small area of land adjacent to the redline boundary lies within a HSE Consultation zone for an historic site, listed as a Hazardous Installation of Oil. This site, now privately owned, is no longer an operational oil depot and is presently used for commercial storage purposes. WCOWL can therefore confirm there are no risks in relation to the HSE Land Use Planning considerations, and no further action is required on behalf of the Project.
Torridge District Council	Whilst it is recognised that the majority of the infrastructure would be subterranean, the main onshore substation construction compound is located adjacent to an area currently used for industrial purposes, to the south of Yelland Quay mineral depot and to the southeast of an existing energy distribution network. It would be for the decision taker to determine whether the principle of development is acceptable and justified for its open countryside location. Torridge District Council (TDC) have no further comments to make on the principle of development. The Local Planning Authority would have concern regarding the potential cumulative highway impact, and whether the development would significantly impact the flow of access in and out on the A39, the primary route into Torridge, and resultant congestion. The views of the Local Highway Authority will be key in this regard. Additionally, the impacts on the safe cycle and pedestrian routes should be comprehensively assessed in the determination of the planning application.	Impacts on environmental and heritage assets from landfall cables may be balanced against the social, environment and economic benefits of offshore renewable energy. The substation location is proposed within an existing industrial area and will be screened with trees to mitigate its visual impact within the wider landscape. WCOWL will be liaising with the Local Planning Authority to agree traffic movements prior to works commencing on site, and plans and mitigations will be outlined and managed under a Construction Traffic Management Plan and Construction Environment Management Plan for the duration of the works.

Consultee	Summary of comments	The Applicant's response

6.5 Onshore Ecology and Ornithology

195. The assessment of effects on ecology and ornithology within Chapter 16: Onshore Ecology and Ornithology of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 16.A: Biodiversity Net Gain Assessment
- Appendix 16.B: Preliminary Ecological Appraisal
- Appendix 16.C: Extended Phase 1 Habitat Technical Report - Braunton and Yelland - Proposed Access Routes
- Appendix 16.D: Bat Activity Survey
- Appendix 16.E: Supplementary Bat Activity Survey Interim Report (Saunton Road)
- Appendix 16.F Bat Emergence & Activity Survey – Buildings
- Appendix 16.G: Inspection & Bat Emergence Survey – Trees
- Appendix 16.H: Otter & Water Vole Survey
- Appendix 16.I: Dormice Survey
- Appendix 16.J: Yelland Substation Badger Survey
- Appendix 16.K: Breeding Bird Survey
- Appendix 16.L: Great Crested Newt Survey: Habitat Suitability Index, eDNA & Population Class Assessment
- Appendix 16.M: Reptile Survey
- Appendix 16.N: Terrestrial Invertebrate Survey
- Appendix 16.O: Aquatic Macro-Invertebrate Survey
- Appendix 16.P: National Vegetation Classification
- Appendix 16.Q: Aquatic Vegetation Survey
- Appendix 16.R: Arboricultural Impact Assessment

196. Comments were received from the following consultees in relation to Chapter 16, their comments and the responses are summarised in **Table 6.7** below:

- Braunton Marsh Drainage Board
- Braunton Parish Council
- Devon Wildlife Trust
- Environment Agency (see **Appendix C** for comments and responses)
- Natural England (see **Appendix A** for comments and responses)
- Northam Town Council
- North Devon Biosphere
- North Devon Council
- RSPB

- Torridge District Council.

6.5.1 Onshore Surveys for Protected and Notable Species

197. Several comments from statutory consultees queried the extent and geographical scope of the surveys undertaken to inform the baseline for the assessment in **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES**.

198. **Section 16.4.3 Protected and Notable Species** of **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES** details the surveys that were undertaken, the methodology and results of which are presented in the appendices submitted in support of the chapter.

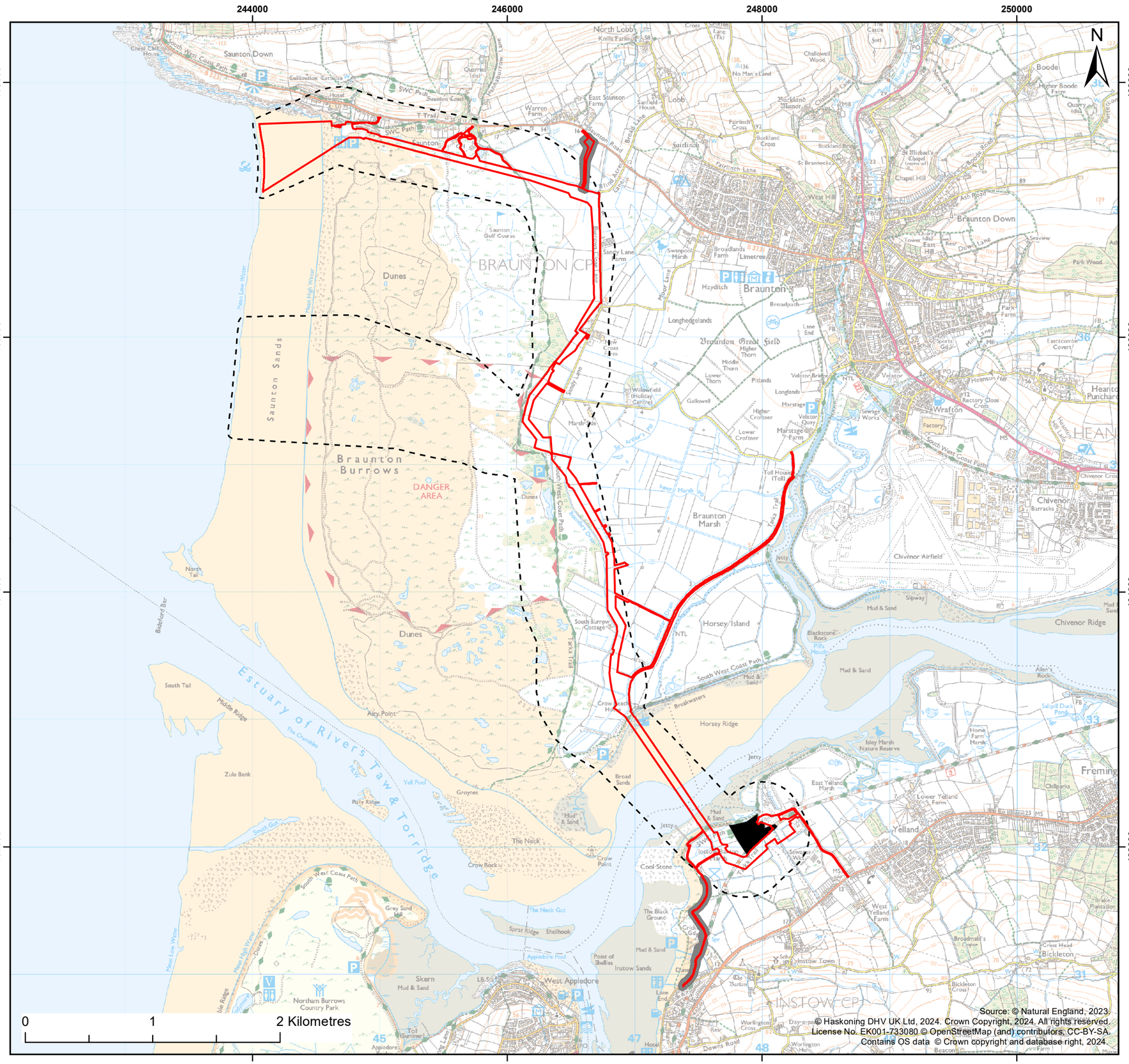
199. There were also requests for further surveys to support the conclusions within the assessment. Additional surveys have therefore been undertaken post-submission with the results presented within this **ES Addendum**.

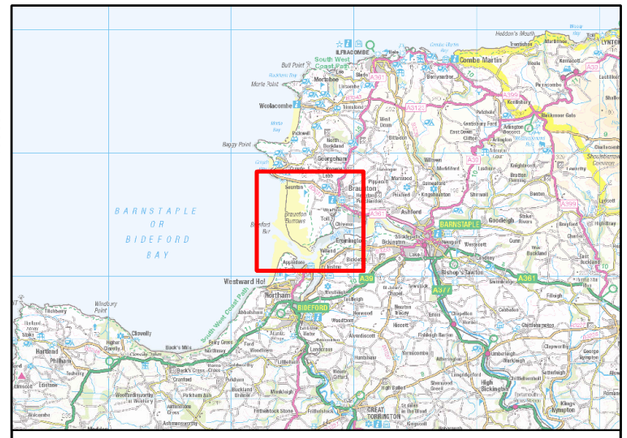
200. To provide additional clarification figures showing the geographical extent of the surveys undertaken to provide the baseline for the **Onshore ES** and post-submission have been produced and are presented in **Figure 6.1** to **Figure 6.5**. In addition, details of the surveys and the figures are provided in **Table 6.6**.

Table 6.5 Onshore Surveys for Protected and Notable Species

Protected or Notable Species	Figure	Supporting Documents
Badgers	Figure 6.1 Extended Phase 1 Habitat Survey Area	Submitted with **Onshore ES**: • **Appendix 16.B: Preliminary Ecological Appraisal** • **Appendix 16.J: Yelland Substation Badger Survey**.
Bats	Figure 6.2 Bat Survey Area	Submitted with **Onshore ES**: • **Appendix 16.D: Bat Activity Survey** • **Appendix 16.E: Supplementary Bat Activity Survey Interim Report (Saunton Road)** • **Appendix 16.F Bat Emergence & Activity Survey – Buildings** • **Appendix 16.G: Inspection & Bat Emergence Survey – Trees.** Submitted with **ES Addendum**: • **Appendix H: Supplementary Bat Activity Survey Report (Saunton Road)**
Great Crested Newts	Figure 6.3 Great Crested Newt	Submitted with **ES Addendum:**

Protected or Notable Species	Figure	Supporting Documents
	Survey AreaFigure 6.3 Great Crested Newt Survey Area	• **Appendix AA: Great Crested Newt Survey Report.**
Petalwort	Figure 6.4 Petalwort Survey Area	Submitted with **ES Addendum:** • **Appendix L: Petalwort Desk-Based Assessment and Survey Report.**
Wintering Birds	Figure 6.5 Wintering Bird Survey Area	Submitted with **ES Addendum:** • **Appendix J: Wintering Bird Survey Report (Braunton Marsh and River Taw).**





Legend:

- Onshore Development Area
- Extended Phase 1 Habitat and Badger Survey Area (2022)
- Extended Phase 1 Habitat Survey - Braunton and Yelland Access Routes (2024)
- Additional Badger Survey Area (Yelland) (2024)

Client:	Project:
White Cross Offshore Wind Ltd.	White Cross Offshore Windfarm

Title: Extended Phase 1 Habitat Survey Area

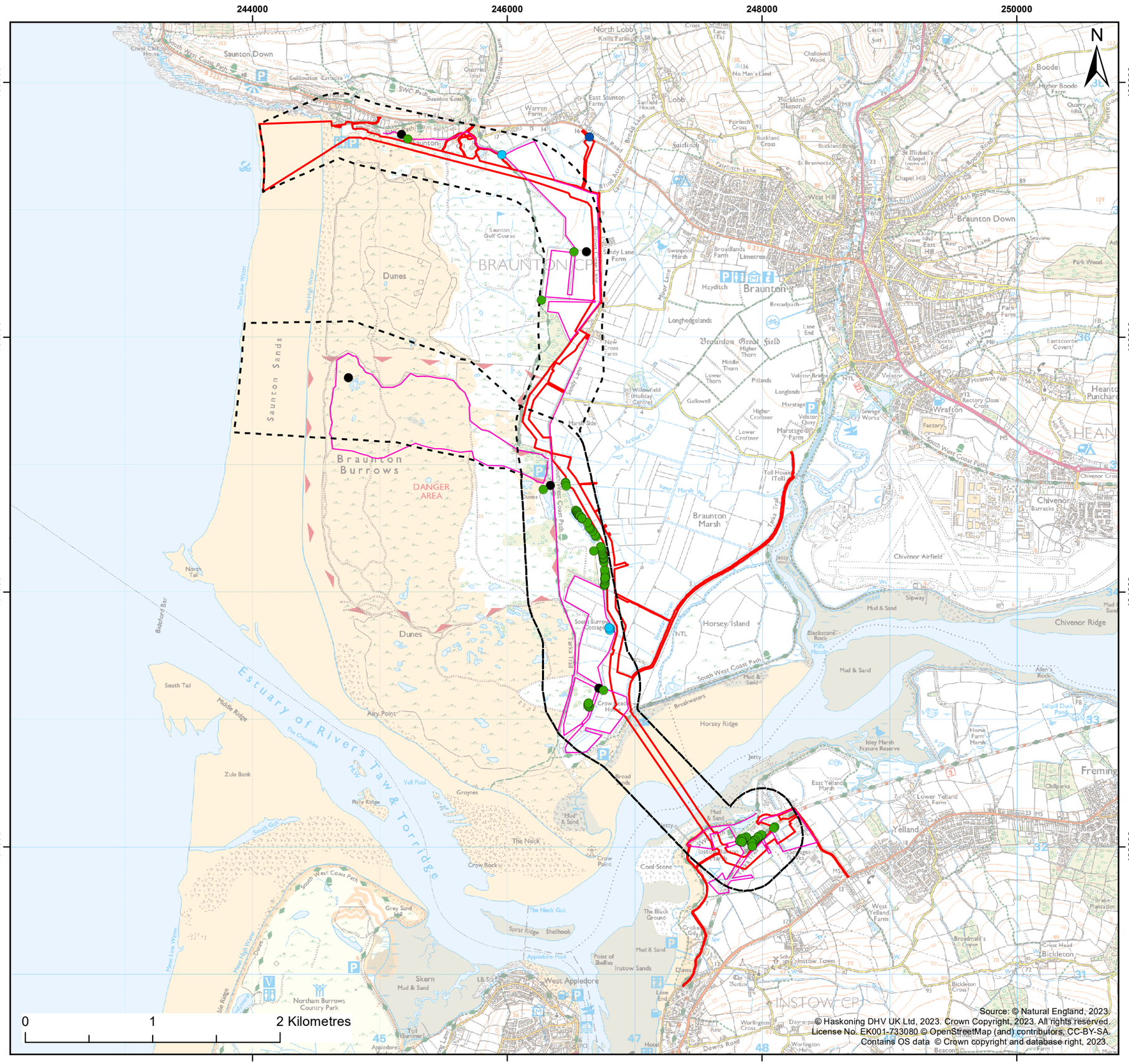
Figure: 6.1 Drawing No: PC2978-RHD-ZZ-XX-DR-Z-0001

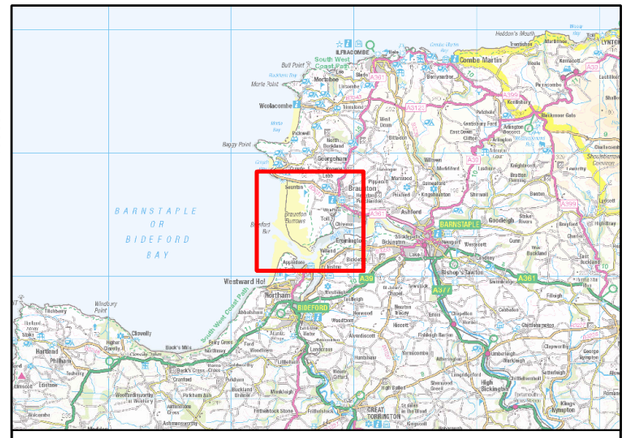
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
P02	06/06/2024	MW	AB	A3	1:30,000
P01	22/11/2023	AB	CB	A3	1:30,000

Co-ordinate system: British National Grid

WHITE CROSS

Royal HaskoningDHV
Enhancing Society Together





Legend:

- Onshore Development Area
- Supplementary Bat Activity Survey (Saunton Road) (2024)
- Bat Emergence and Activity Survey Buildings Locations (2022)
- Inspection & Bat Emergence Survey Tree Locations (2022)
- Static Bat Detector Positions (2022)
- Transect Routes (2022)
- Bat Emergence and Activity Survey Area (2022)

Client:	Project:
White Cross Offshore Wind Ltd.	White Cross Offshore Windfarm

Title: Bat Survey Area

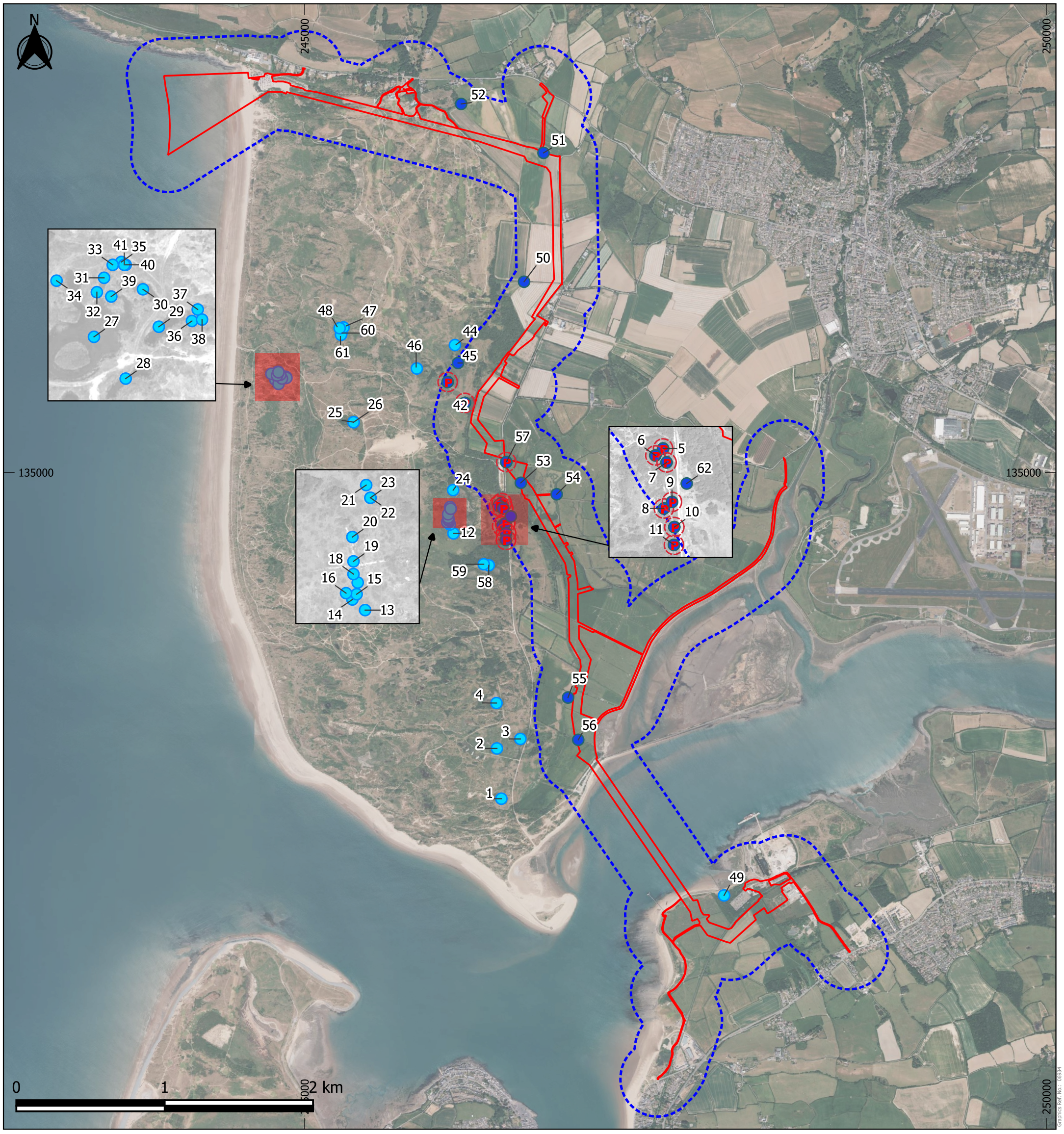
Figure: 6.2 Drawing No: PC2978-RHD-ZZ-XX-DR-Z-0004

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
P02	06/06/2024	MW	AB	A3	1:30,000
P01	22/11/2023	AB	CB	A3	1:30,000

Co-ordinate system: British National Grid

WHITE CROSS

Royal HaskoningDHV
Enhancing Society Together



BSG | ecology

OFFICE: OXFORD
T: 01865 883833

JOB REF: P22-827

PROJECT TITLE

WHITE CROSS OFFSHORE WINDFARM

DRAWING TITLE

Figure 1: GCN Pond Locations

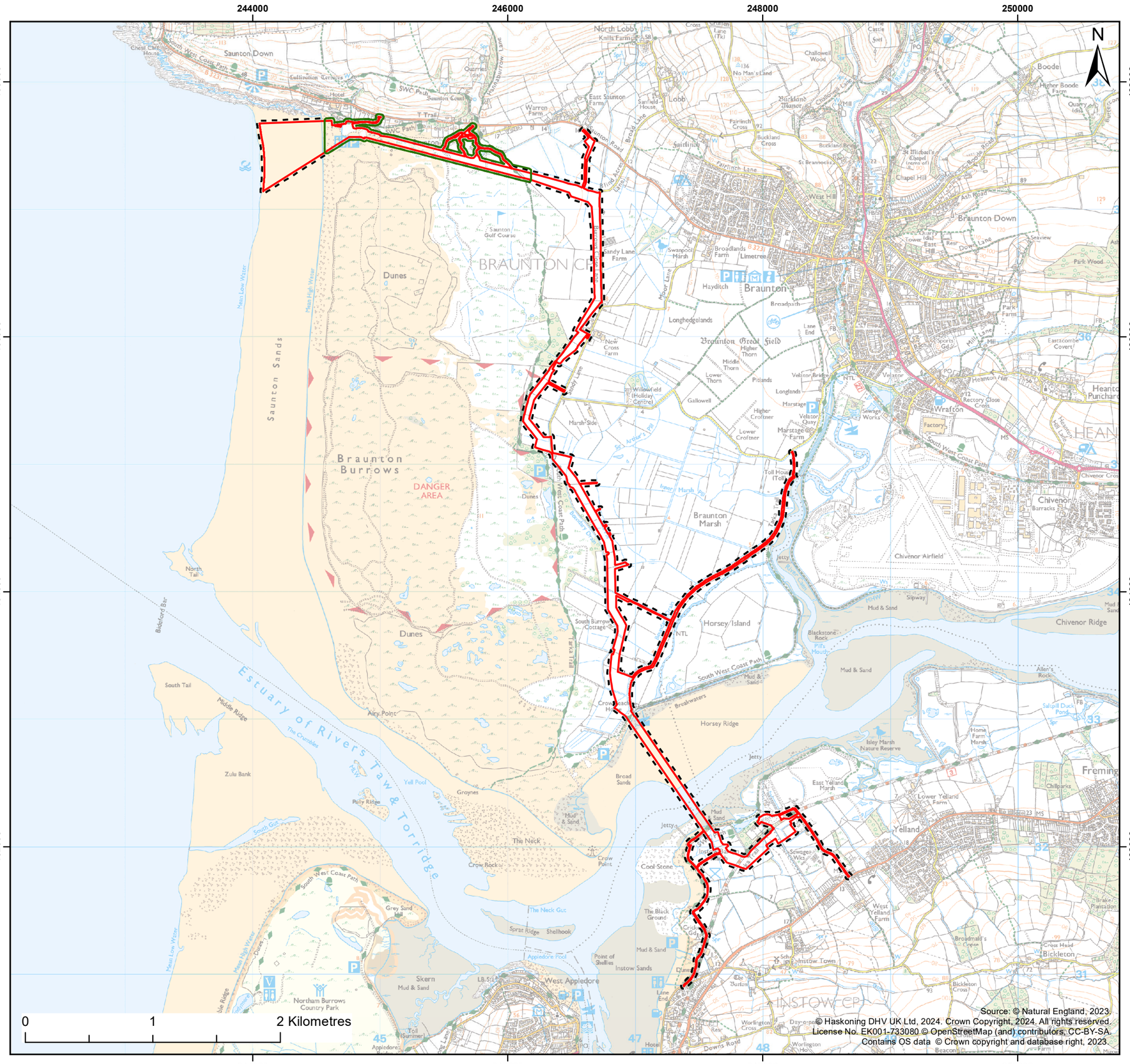
Legend

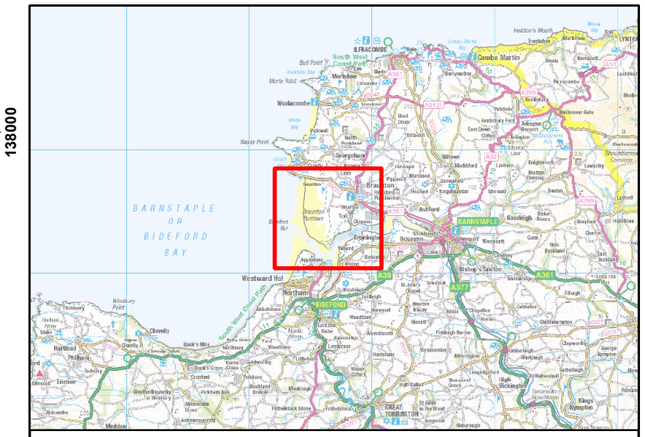
- Ponds subject to eDNA survey
- Ponds testing positive for great crested newt eDNA
- Ponds subject to population estimate survey
- Ponds scoped out of 2024 survey
- Survey boundary
- Site boundary

DATE: 01/07/2024	CHECKED: GM	SCALE: 1:25,000
DRAWN: SL	APPROVED: GM	VERSION:1.1

Projection: OSGB 1936/British National Grid - EPSG 27700
Sources: BSG Ecology survey data

Graphics Ref. No.: 06534





Legend:

- Onshore Development Area
- Petalwort Desk Based Assessment Area
- Petalwort Field Survey Area

Client:	Project:
White Cross Offshore Wind Ltd.	White Cross Offshore Windfarm

Title:

Intertidal Survey Area

Figure: 6.4 Drawing No: PC2978-RHD-ZZ-XX-DR-Z-0012

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
P02	07/06/2024	MW	AB	A3	1:30,000
P01	22/11/2023	AB	CB	A3	1:30,000

Co-ordinate system: British National Grid

WHITE CROSS

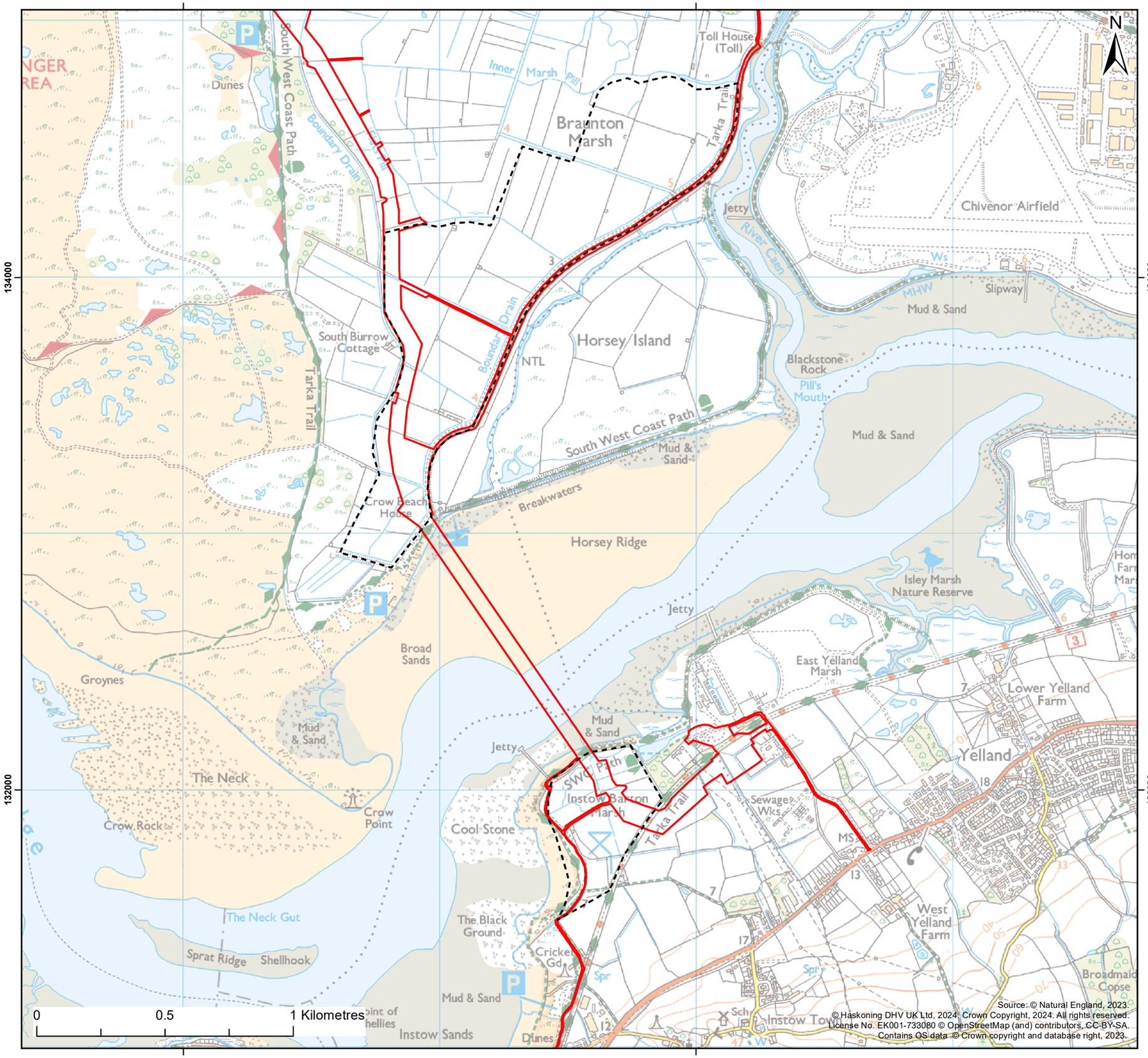
Royal HaskoningDHV
Enhancing Society Together

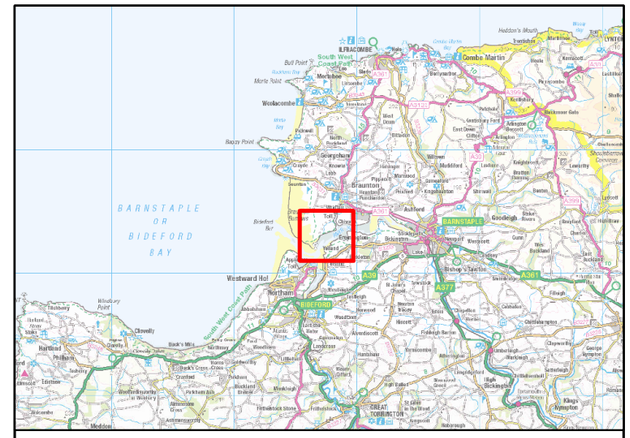
246000

248000

134000

132000





Legend:

- Onshore Development Area
- Wintering Bird Survey Area

Client: White Cross Offshore Wind Ltd.	Project: White Cross Offshore Windfarm

Title: Intertidal Survey Area

Figure: 6.5 | Drawing No: PC2978-RHD-ZZ-XX-DR-Z-0012

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
P02	10/06/2024	MW	AB	A3	1:15,000
P01	22/11/2023	AB	CB	A3	1:15,000

Co-ordinate system: British National Grid

WHITE CROSS

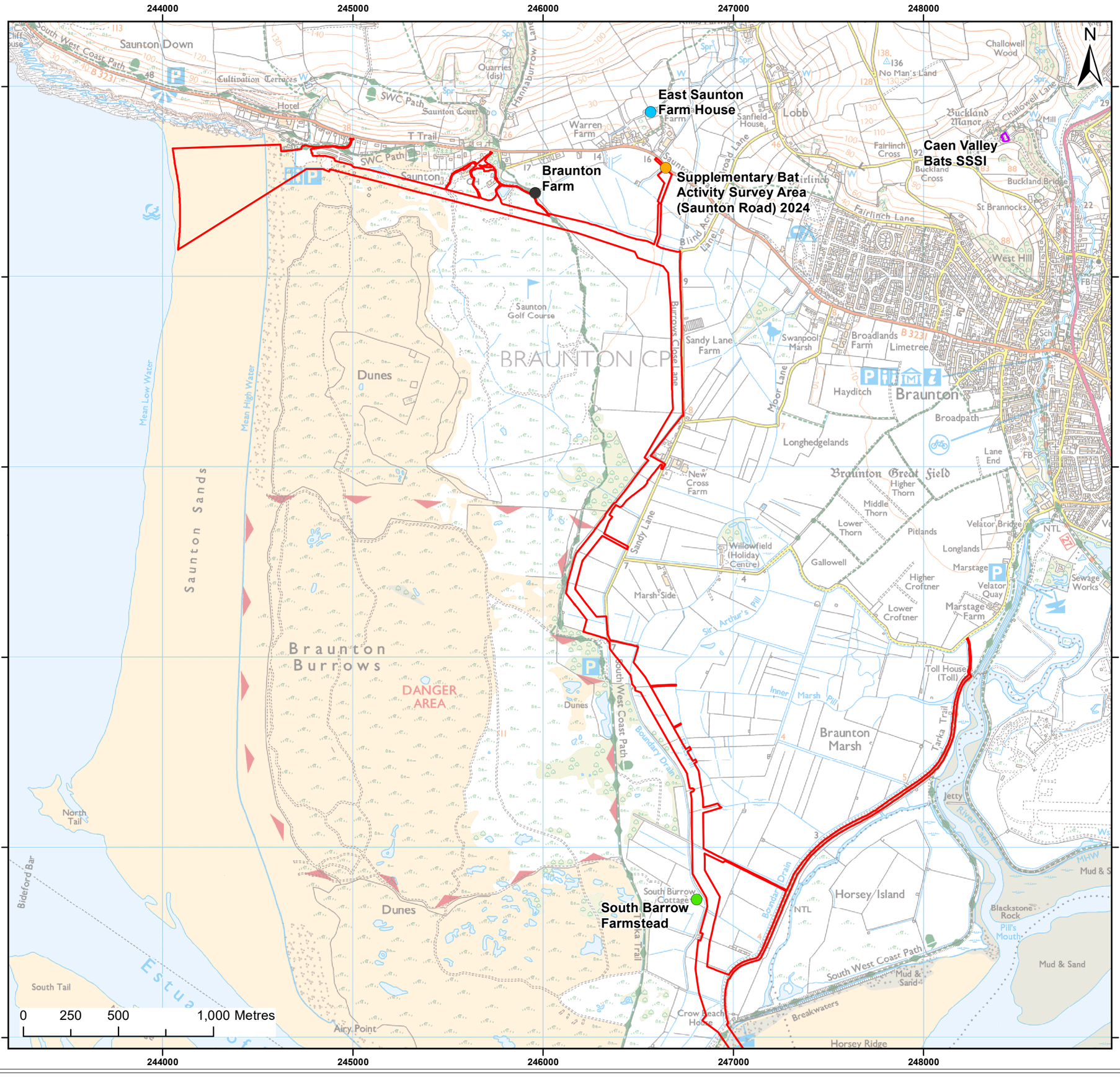
Royal HaskoningDHV
Enhancing Society Together

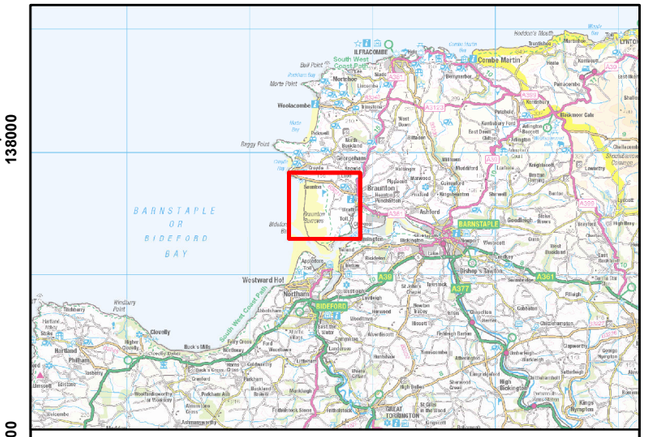
6.5.2 Bat Mitigation

201. The location of the known bat roosts in relation to the Onshore Development Area are shown in **Figure 6.6**. This includes the location of the Caen Valley SSSI, and the East Saunton Farm House, as well as the two locations surveyed for the Onshore ES at Braunton Farm and South Barrow Farmstead (see **Appendix 16.F: Bat Emergence & Activity Survey Report – Buildings** of the **Onshore ES**).

202. The Saunton Road section of hedgerow to be temporarily affected has been subject to bat survey in June to August 2023 and April to May 2024 (as detailed in **Appendix H: Supplementary Bat Activity Survey Report (Saunton Road)** of this **ES Addendum**). The surveys were carried out to inform the specific approach for mitigation in this area which is detailed in **Appendix I: Approach to Bat Mitigation at Saunton Road**. This report provides further detail on the precautionary mitigation measures (previously outlined within **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES**) that are proposed to ensure that an alternative sheltered flight path/habitat feature is provided while the Saunton Road hedgerow is removed/maintained in a short condition during the course of construction works.

203. Mitigation measures proposed for impacts on foraging and commuting bats using other parts of the Onshore Development Area remain unchanged and are presented within **Section 6.5.13** of the **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES**.





Legend:

- Onshore Development Area
- Caen Valley Bats SSSI
- South Barrow Farmstead
- Braunton Barn
- East Saunton Farm House
- Supplementary Bat Activity Survey (Saunton Road) (2024)

Client:	Project:
White Cross Offshore Wind Ltd.	White Cross Offshore Windfarm

Title: Location of known Bat Roosts

Figure: 6.6 Drawing No: PC2978-RHD-ZZ-XX-DR-Z-0820

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
P01	28/06/2024	MW	AB	A3	1:20,000

Co-ordinate system: British National Grid

WHITE CROSS

Royal HaskoningDHV
Enhancing Society Together

Table 6.6 Consultation responses to Chapter 16 Onshore Ecology and Ornithology

Consultee	Summary of comments	The Applicant's response
Braunton Marsh Drainage Board	The drainage board would like to see an alternative route taken to avoid damage to the Marshes and the wildlife that inhabits it. The drainage board also state that the route will impact on the diversity of the area which incorporates the Area of Outstanding Natural Beauty (AONB), North Devon Biosphere and a SSSI.	The selected cable route avoids significant residential areas and mitigates the potential impacts to the Braunton Burrows Special Area of Conservation (SAC) by using a trenchless technique to install the cable underground without disturbing the surface. The remainder of the route will travel outside of the SAC and other identified Sites of Special Scientific Interest (SSSI) towards the Taw Estuary. Any plans and mitigations will be outlined and managed under a Construction Environment Management Plan (CEMP) for the duration of the works, and in agreement with the Local Planning Authority (LPA). WCOWL has responded to planning consultee representations from the North Devon Biosphere and North Devon Coast Areas of Outstanding Natural Beauty separately to address their specific concerns. The assessment of the impacts of the proposed project to environmental receptors and mitigations during, construction, operations and maintenance phase of the project is summarised in **Section 16.13** / **Table 16.31** of the **Chapter 16: Onshore Ecology and Ornithology** of the Onshore ES. Following construction all areas of the onshore export cable route directly impacted, including the Braunton Marsh, will be reinstated following measures set out in **Appendix N Outline Landscape and Ecological Management Plan** of this **ES Addendum**.

Consultee	Summary of comments	The Applicant's response
		WCOWL is also committed to delivering 10% biodiversity net gain as set out in **Appendix 16A: Biodiversity Net Gain Assessment** of **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES**.
Braunton Parish Council	The proposed onshore cable route would have a significant detrimental impact on the community in terms of loss of tourism, disruption to local social-economics, adverse effect to the natural environment including the Northern Devon UNESCO Biosphere and Buffer Zone for the core dune system. The development will also potential negatively impact two recognised Sites of Special Scientific Interest (SSSI), Site of Special Conservation (SAC), the AONB and Braunton Marsh, which are all within close proximity to the proposed Onshore Export Cable Corridor. The proposed development would adversely affect the intrinsic environmental value and character of the landscape, and damage the natural environment and delicate ecosystems through the unique UNESCO Northern Devon Biosphere. Concerns regarding potential ground contamination from waste material specifically bentonite during Horizontal Direct Drilling, and the consequent pollutant effects this may have on the land, water courses and drainage ditches. This area is rich in wildlife and there are concerns regarding the negative impacts this development could potential have on wildlife and important habitats for migratory birds.	An assessment of the impacts of the Project on onshore ecology and ornithology, including on the designated nature conservation sites, is provided in **Chapter 16: Onshore Ecology and Ornithology** of the **Onshore ES**. The assessment of the impacts of the Project on the North Devon AONB, as well as other landscape designations and defined areas is provided within **Chapter 20: Onshore Landscape and Visual Amenity** of the **Onshore ES**. An assessment of the risks of bentonite breakout associated with the trenchless crossings is provided with the **Taw Estuary and Braunton Burrows Crossing Method Statement** submitted with the onshore application (**Appendix 5A** of the **Onshore ES**). The revised **Outline Construction Environmental Management Plan** (OCEMP) submitted as part of the further environmental information includes an **Outline Bentonite Management Plan** detailing the management practices should a bentonite breakout occur. A full response to the comments raised, further clarification and sign-posting to where in the original application these comments are addressed and to what new information is provided as part of this **ES Addendum**, is provided in **Appendix V: Planning Policy Clarifications Note** of this **ES Addendum**.

Consultee	Summary of comments	The Applicant's response
Devon Wildlife Trust	DWT have raised comments around impacts to biodiversity, including direct and potential indirect impacts to various ecological and environmental receptors on site and within the wider area: • Braunton Burrows SSSI / SAC • Taw Torridge Estuary SSSI • Greenaways & Freshmarsh, Braunton SSSI • Caen Valley bats SSSI • Horsey Island and the Inner Bank • Unconfirmed Wildlife Sites • Notable Plant Species • Ditch Network • Commuting / foraging bats, birds, Great Crested Newts (GCNs) and reptiles • Trees at Yelland substation DWT also raise comments around the cable route corridors operational impacts, potential future impacts during decommissioning, and Biodiversity Net Gain enhancement requirements.	The selected cable route has been designed and amended to avoid and mitigate the potential direct impacts to the Braunton Burrows Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) and Taw Torridge Estuary SSSI habitat features. A trenchless sub-terranean drilling technique, known as Horizontal Directional Drilling (HDD), has been selected for the SSSI sections to minimise any adverse environmental impacts on the ecology and landscape, installing the cable underground without disturbing the surface. Fu The remainder of the route will travel outside of the SAC and other identified SSSIs towards the Taw Estuary. Impacts to habitats along the cable route corridor will be temporary only. A Hydrofracture Assessment has been undertaken for the HDD cable route sections below the SSSIs, which demonstrates there is no significant risk of frac-out along the bore profiles with the exception at the entry and exit points where the bore profile rises (above Mean High Water Springs). Further detail is provided in **Outline Bentonite Management Plan** as a standalone document, containing onshore mitigation / remediation measures in the unlikely event of frac-out, such as use of sandbagging and casing. Additional baseline survey work was undertaken to understand how birds are using the known lapwing roosts in Braunton Marsh within the same fields as the proposed cable route, which involved eight visits between October and March to inform any mitigation requirements. Additional information is provided in the Wintering Bird Survey Report and Approach to Lapwing Mitigation

Consultee	Summary of comments	The Applicant's response
		report submitted as **Appendix J** and **Appendix K** to the **ES Addendum**. The area surrounding the proposed drilling compound on the south side of the estuary is also being monitored. Works in these areas will be undertaken outside the winter period where possible and screened to minimise disturbance. Precautionary mitigation management is proposed near Braunton marshes to ensure suitable alternative habitat is available during the temporary construction works. The area may be secured as mitigation through a formal agreement between WCOWL and the landowner. Potential indirect impacts from site worker recreational pressure at the Taw Torridge Estuary SSSI, and other areas, have been considered in **Chapter 21: Socio Economics, Tourism and Recreation** of the ES. Given there are so few workers for a short duration, any potential impacts (both adverse and beneficial) would be negligible. Replacement tree planting will be undertaken where the cable route works necessitates felling of individual trees. Individual trees and woodland will be avoided, wherever possible, through the detailed design process and protected during the construction works. An **Outline Landscape and Ecological Management Plan (LEMP)** outlining the relevant mitigation and maintenance requirements for replacement tree and hedgerow planting is provided in **Appendix N** to the ES Addendum. Plans and mitigations for hydrologically sensitive habitats such as marshy grassland will be

Consultee	Summary of comments	The Applicant's response
		outlined and managed under a Construction Environment Management Plan (CEMP) for the duration of the works, and in agreement with the LPA. WCOWL will also be undertaking further consultation with the Lead Local Flood Authority (at Devon County Council) to ensure drainage designs are appropriate. Mitigation may involve marking out of sensitive areas / species, tool box talks, ECoW supervision and use of low ground bearing pressure plant. The linear cable will be installed underground in deep sandy substrate, and is not considered as having an impact on existing hydrology / hydrogeology as it would not form a barrier or a new route through different substrates. Given no change to hydrology would occur, there is no identified pathway for any impact on plant communities to arise. Within the works areas the presence of the ductwork would not result in any hydrological change given the ground conditions and the lack of obstruction to groundwater flows as a result. Additional information is provided in the Hydrogeological Risk Assessment (**Appendix G**), Hydrogeology Technical Note (**Appendix A Annex 2**) and updated Flood Risk Assessment (**Appendix D**) as part of the **ES Addendum**. Additional bat assessment data was obtained June to August 2023 to close data gaps relating to the temporary removal of the Saunton Road hedgerow section, to accommodate a visibility splay for safe vehicular access. The hedgerow is not assessed as being of high value for bats, however bats were

Consultee	Summary of comments	The Applicant's response
		recorded using it during the surveys. The approach for mitigation includes installation of a temporary 'fake hedge' and re-instatement of the coppiced hedges following completion of the works. Additional information is provided in the **Supplementary Bat Activity Survey Report (Saunton Road)** in **Appendix H** to the **ES Addendum**. WCOWL acknowledges a European Protected Species Mitigation Licence (EPSL) from Natural England may be required for Great Crested Newts (GCN) in the wider area. The exact approach will be kept under review and obtaining a licence is an option as stated in the ES. The cable route has been designed to avoid ponds and habitats suitable for this species, and vegetation clearance work within 250m of breeding ponds is minimal with impacts assessed to be very low. The majority of the cable route habitat is assessed as sub-optimal for reptiles with only localised and temporary habitat loss. Mitigation measures will include the implementation of staged habitat manipulation works to temporarily displace reptiles from the proposed construction footprint, ECoW supervision, and translocation if required. WCOWL is committed to achieving an overall 10% biodiversity net gain in all three habitat modules and the approach is detailed within the proposed Section 106 obligation. Habitats with identifies losses will be reinstated to the condition they were in before construction, and then an additional 10% net gain delivered. WCOWL are engaging with North Devon Biosphere

Consultee	Summary of comments	The Applicant's response
		through their Nature Capital Market Place to explore options to overcome the biodiversity unit deficit, including habitat enhancement, reinstatement, mitigation and creation. Regarding future maintenance activities, the cables will be contained within ducting which allows them to be accessed from link boxes, meaning no further ground works would be needed once the cabling infrastructure is installed. Future decommissioning is being considered and would be outlined a 'Decommissioning Programme for approval by the LPA. The cables may be left buried in situ with the cable ends cut, sealed and securely buried or alternatively removed by pulling them through the ducts.
Northam Town Council	Northam Town Council notes with concern that the proposal would have a significant and detrimental effect on the Braunton Burrows, a UNESCO World Heritage Site.	Whilst Braunton Burrows is not listed as an official UNESCO World Heritage Site, it is an important part of the North Devon Biosphere Reserve sand dune systems (as named under the UNESCO Man and the Biosphere Programme). Additionally, Braunton Burrows is identified as a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The potential development impacts on the ecology and landscape features at Braunton Burrows have been outlined and assessed in **Chapter 16: Onshore Ecology and Ornithology** and **Chapter 20: Landscape and Visual Amenity** of the **Onshore ES.** Given the environmental sensitivities of this area and its listed designations, a trenchless sub-terranean drilling technique known as Horizontal Directional Drilling (HDD) has been selected for the cable route section crossing Braunton Burrows sand dunes. This

Consultee	Summary of comments	The Applicant's response
		technique aims to minimise any adverse environmental impacts on the ecology and landscape at Braunton Burrows. Further details of this technique and the measures that will be implemented to mitigate any potential impacts is provided in **Chapter 5: Project Description** of the ES. Appropriate mitigations will be implemented during construction in accordance with any conditions and recommendations agreed with the Local Planning Authority.
North Devon Biosphere	Bird disturbance: Taw Torridge Estuary crossing is at the worst possible time for disturbance to the birds for which the SSSI is notified. The HDD will be carried out in the winter months very close to the most important roosting sites in the estuary on the north and south banks.	Additional baseline survey work has been undertaken to understand how birds are using the known lapwing roosts in Braunton Marsh within the same fields as the proposed cable route, which involved eight visits between October and March to inform mitigation requirements. Additional information is provided in **Appendix J: Wintering Bird Survey Report (Braunton Marsh and River Taw)** of this **ES Addendum**. The results have been used to ensure the that the baseline data is up-to-date, and to help consider any further mitigation requirements. Mitigation requirements for lapwing are set out in **Appendix K: Approach to Lapwing Mitigation** of this **ES Addendum**.
	Braunton Marsh is a special area that will be under pressure from rising sea-levels that need to be accommodated and managed. Whilst some change is inevitable with eustatic pressures, the need to keep a large core area of well managed freshwater wetland will remain as part of the matrix of other coastal wetlands. Therefore quality of habitat and retention and recovery of it is important. Therefore more explanation about how the hydrology	The Applicant notes the aims of the North Devon Biosphere in relation to Braunton Marshes and will continue to engage with them regarding Biodiversity Net Gain opportunities.

Consultee	Summary of comments	The Applicant's response
	of the dunes and marshes will not be impacted will be helpful. We note that the applicants are committed to 10% Biodiversity net gain which is laudable ahead of the legislation. As well as the medium to long term changes that need to be planned for (as stated above),we have aspirations for the marsh area to host a released population of water voles, having carried out over 18 months of predator monitoring. We would also like to ensure that there is a landscape scale programme to support landowners to enhance the marshes for their environmental quality and cultural connections with agriculture. Should consent be given, we will work with the developers to ensure that BNG is delivered in the most effective way in support of these aspirations.	
RSPB	The RSPB remains concerned that this application risks harm to the notified features (Intertidal habitats and overwintering waterbirds) of the Taw Torridge Estuary Site of Special Scientific Interest (the SSSI), and to the RSPB's Isley Marsh Nature Reserve (also within the SSSI). In the RSPB's view the most significant potential risk is disturbance to recognised high-tide roosts at Braunton Marshes, Horsey Island, Crow Point, Yelland, Cool Stone roost, Black Ground through construction works and ongoing maintenance work.	Additional baseline survey work has been undertaken to understand how birds are using the known lapwing roosts in Braunton Marsh within the same fields as the proposed cable route, which involved eight visits between October and March to inform mitigation requirements. Additional information is provided in **Appendix J: Wintering Bird Survey Report (Braunton Marsh and River Taw)** of this **ES Addendum**. The results have been used to ensure the that the baseline data is up-to-date, and to help consider any further mitigation requirements. Mitigation requirements for lapwing are set out in **Appendix K: Approach to Lapwing Mitigation** of this **ES Addendum**.
Torridge District Council	It is noted that the main primary impact to wildlife and ecology would be localised to the proposed development area and therefore would be for the decision maker to determine the acceptability of this	Additional baseline survey work has been undertaken to understand how birds are using the known lapwing roosts in Braunton Marsh within the same fields as the proposed cable route, which involved eight visits

Consultee	Summary of comments	The Applicant's response
	impact. Nonetheless, the proposed development within the estuary could potentially impact the wildlife and important habitats of migratory birds. TDC would request the consideration be given to cross-boundary habitats and wildlife and where necessary the appropriate mitigation controlled via planning condition.	between October and March to inform mitigation requirements. Additional information is provided in **Appendix J: Wintering Bird Survey Report (Braunton Marsh and River Taw)** of this **ES Addendum**. The results have been used to ensure the that the baseline data is up-to-date, and to help consider any further mitigation requirements. Mitigation requirements for lapwing are set out in **Appendix K: Approach to Lapwing Mitigation** of this **ES Addendum**.

6.6 Onshore Archaeology and Cultural Heritage

204. The assessment of effects on archaeology and cultural heritage are covered within Chapter 17: Onshore Archaeology and Cultural Heritage of the Onshore ES, the chapter was supported by the following appendices:

- Appendix 17.A: Onshore Archaeological Dest Based Assessment (DBA)
- Appendix 17.B: APS Report
- Appendix 17.C: Geophysical Survey
- Appendix 17.D: Onshore Infrastructure Setting Assessment
- Appendix 17.E: Outline Onshore WSI
- Appendix 17.F: Geoarchaeological DBA.

205. Comments were received from the following consultees in relation to Chapter 13, their comments and the responses are summarised in **Table 6.8** below:

- Devon County Council
- Heritage Conservation Officer (North Devon Council)
- Historic England.

Table 6.7 Consultation responses to Chapter 17 Onshore Archaeology and Cultural Heritage

Consultee	Summary of comments	The Applicant's response
Devon County Council	DCC raise no objection on matters relating to historic environment provided there is either a submission of further details prior	An Outline Written Scheme of Investigation (OWSI) was submitted as **Appendix 17.E** to the **Onshore ES**.

Consultee	Summary of comments	The Applicant's response
	to determination or a condition requiring the submission of a Written Scheme of Investigation (WSI), and a condition relating to post-excavation work.	This will be further developed post-consent in consultation with DCC's Historic Environment Team and other stakeholders. An Overarching WSI will be produced which may be broken down into Pre-construction and Construction related mitigation documents. This will incorporate the results of fieldwork undertaken to date to ensure an appropriate post-consent mitigation strategy is agreed. An Archaeological Trial Trenching Report is included as **Appendix M** to this **ES Addendum**. A report on the **Geoarchaeological Monitoring of Ground Investigation (GI) Works** is included as **Appendix W** to this **ES Addendum**. WCWOL are supportive of a condition being imposed requiring the submission of a final WSI, to include post-excavation work, prior to the commencement of any site works.
Heritage Conservation Officer (North Devon Council)	NDC raise concern how the substation is likely to be visible on the southern bank of the River Taw and may contribute to the increasing urbanisation of the area (along with the re-development of Yelland Quay), and impact the wider landscape setting of listed buildings such as the grade I listed St Augustine's church in Heanton Punchardon. There are various grade II listed WW2 structures on Braunton Burrows and these settings of the buildings will need to be protected, i.e. the wider landscape re-instated once the trenches are completed.	The assessment of the potential impacts of the Project on archaeology and cultural heritage, including the settings of assets, are presented in **Chapter 17: Onshore Archaeology and Cultural Heritage** of the **Onshore ES**. WCOWL acknowledges the proposed substation is considered to have a visual impact on the surrounding landscape. The Grade I listed St Augustine's church was included as a receptor in the assessment, but was screened out from further assessment due to its distance from the onshore substation. The presence of the substation in the landscape is not

Consultee	Summary of comments	The Applicant's response
		considered to affect the heritage significance of the church. Additionally, tree planting is proposed around the substation in order to provide screening to mitigate any visual impacts from the operation of the substation, the details are set out in **Appendix N Outline Landscape and Ecological Management Plan** of this **ES Addendum**.
	There are various listed buildings located along the Crow Point Toll Road, which is to be used for construction traffic. These include the two stiles and flanking walls, the grade II listed Great Sluice and the grade II listed Velator Bridge which leads to the Toll Road. The document doesn't appear to mention the Velator Bridge which is outside the main study area but carries the route to the Toll Road therefore will be affected, or the Great Sluice and it being more likely to be damaged by vehicles than the stiles. NDC suggest a weight and width assessment is made of the bridge and sluice before significant increase in vehicular traffic over it is made.	As set out in **Chapter 5: Project Description** of the **Onshore ES** the privately owned Toll Road will only be used by light vehicles and 4x4 during the early and enabling works to allow access along this section of the onshore export cable corridor before the construction of the temporary haul road. During the main phase of the onshore construction this access will only be used by light vehicles and 4x4 in case of emergencies. No HGV would be permitted to use this route. Therefore, traffic is not considered to have a significant detrimental impact on the weight bearing capacity of the bridge and sluice features. The Great Sluice and Velator Bridge Grade II listed structures were discounted from the heritage assessment presented within the Environmental Statement, due to being sited at a distance outside of our redline boundary. There was considered to be no viable pathway for a direct impact on these structures as a result of the development, therefore they were not assessed. An **Outline Written Scheme of Investigation** (OWSI) was

Consultee	Summary of comments	The Applicant's response
		submitted as **Appendix 17.E** to the **Onshore ES**. This will be further developed post-consent in consultation with the Heritage Conservation Officer and other stakeholders. An Overarching WSI will be produced which may be broken down into Pre-construction and Construction related mitigation documents. Reference to the heritage features and mitigation measures will be included to ensure the risks highlighted are documented and carried through to construction phase management. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. This will include measures to restrict and control the use of the Toll Road for the duration of the works by construction traffic from the Project.
Historic England	Historic England provided comments on their role in the Consultation Process and made specific reference to not being consulted at the pre-application stage on aspects of field assessment and evaluation. Reference is also made to range of guidance, standards and best practice, including new guidance currently out for consultation, and the need to ensure that there is fully compliance with policies 194, 199, 203 and 205 of the National Planning Policy Framework (NPPF).	To date all elements of the archaeological field assessment and evaluation works undertaken by WCOWL have been carried out through consultation with the Devon County Council Historic Environment Team, and in line with the **Outline Written Scheme of Investigation** (OWSI) which was submitted as **Appendix 17.E** to the **Onshore ES**. However, WCOWL acknowledge Historic England's comments in respect of having direct and effective communication and would value further input from an

Consultee	Summary of comments	The Applicant's response
		important key stakeholder (whereby via a suitable forum, or written point of contact). WCOWL intends to streamline the consultation process with designated technical specialists going forward, and engagement protocols will be specified in our future documentation and reflected in the Overarching WSI (to be produced in the post-consent stages) of the project, which may be broken down into Pre-construction and Construction related mitigation documents. WCOWL acknowledge the comments in relation to the NPPF and specific guidance. These comments have been collated and will be reflected and clarified in detail within the final Overarching WSI, with specific consideration to the guidance referenced by Historic England, which is to be submitted for approval post-consent.
	Within the Environmental Statement Chapter 17, Table 17.12, a potential permanent indirect impact to Designated or non-designated heritage assets has been identified; The loss of heat from electrical cable has the potential to have an adverse effect on any waterlogged archaeological remains. This is not referenced as an impact again within the document suite. How will this impact be modelled, assessed, or mitigated?	The loss of heat from the onshore electrical cable having a potential adverse effect on waterlogged archaeological remains, was captured as a potential impact within **Chapter 17: Onshore Archaeology and Cultural Heritage** (**Table 17.12**) of the **Onshore ES**. WCOWL have considered the following points which we deem excludes the potential impact from further consideration. The maximum heat loss and subsequent dissipation of heat through the soil will not be determined until the soil structure and thermal properties developed in final engineering design are confirmed. However, it's expected that any heat dissipation will be localised and confined to the

Consultee	Summary of comments	The Applicant's response
		areas immediately surrounding the onshore cables and ducts. Given the areas within the immediate locality of the onshore cables will have been subject to disturbance as a result of the onshore cable installation, any sub-surface archaeological / geoarchaeological remains (where present) therein will have been considered as vulnerable to the impacts of onshore cable installation works, with any assets identified and already having been subject to the initial informative stages of mitigation work. On this basis, there is no impact anticipated during operation associated with the heat loss from onshore cables.
	The potential presence of Mesolithic or Neolithic lithic scatters is identified within the Environmental Statement Chapter 17, geoarchaeological desk based assessment and within the Outline Written Scheme of Investigation (onshore) - it would be beneficial for the OWSI (onshore) to clarify that consideration may need to be given to specific excavation methodologies in the areas which have the highest potential for in situ lithic scatters. This would require specialist input into a WSI and should refer to Historic England's 'Managing Lithic Scatters and Sites: Archaeological guidance for planning authorities and developers' which is currently in consultation. The Environmental Statement Chapter 17 highlights a preference for preservation in situ, now referred to as preservation of archaeological remains. Historic England's 'Preserving Archaeological Remains' (2016) guidance sets out the level of	An **Outline Written Scheme of Investigation** (OWSI) was submitted as **Appendix 17.E** to the **Onshore ES**. This will be further developed post-consent in consultation with the Historic England and other stakeholders. An Overarching WSI will be produced which may be broken down into Pre-construction and Construction related mitigation documents. This will include specialist input and include consideration of specific excavation methodologies in the areas which have the highest potential for in situ lithic scatters. All relevant guidance will be referenced.

Consultee	Summary of comments	The Applicant's response
	required prior understanding in order to effect effective preservation strategies. Appendix 3: Water Environment Assessment Techniques, presents a series of techniques which allow for the consideration of the impact of water environment changes on heritage assets.	

6.7 Noise and Vibration

206. The assessment of effects on archaeology and cultural heritage are covered within Chapter 18: Noise and Vibration of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 18.A: Baseline Noise Survey
- Appendix 18.B: Construction Noise and Vibration Predictions
- Appendix 18.C: Construction Traffic Noise Predictions
- Appendix 18.D: Operational Noise Predictions
- Appendix 18.E: Acoustic Terminology Appendix.

207. Comments were received from the following consultees in relation to Chapter 18, their comments and the responses are summarised in **Table 6.9** below:

- Environmental Health Officer (North Devon Council)

Table 6.8 Consultation responses to Chapter 18 Noise and Vibration

Consultee	Summary of comments	The Applicant's response
Environmental Health Officer (North Devon Council)	Environmental Health Officer accepts the findings of Chapter 18: Noise and Vibration and relevant parts of Chapter 22: Human Health of the Onshore ES and recommends a number of conditions be included on any planning permission.	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council.
	<u>Construction Phase Impacts</u> The assessment considers the potential for construction works undertaken in accordance with a Construction Noise and Vibration Mitigation Plan (CNVMP) and a Construction Traffic Management	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council. For further details see response to Environmental Health Officer in

Consultee	Summary of comments	The Applicant's response
	Plan (CTMP) to impact sensitive receptor locations in the vicinity, having regard to relevant standards and guidance. The assessment finds that implementation of works in accordance with the proposed CNVMP and CTMP, plus additional proposed acoustic screening measures in two locations, is likely to ensure that impact significance is kept to minor adverse or below. I accept the findings of the assessment and have made reference to the report's mitigation recommendations in my comments on agreeing a suitable Construction Environmental Management Plan below.	**Table 5.1** of this **ES Addendum**.
	<u>Operational Phase Impacts</u> The assessment considers that only the onshore substation has the potential to give rise to potentially significant noise and vibration emissions during the operation of the development. Vibration arising from operation of the substation will be effectively mitigated through incorporation of anti-vibration mountings and similar. The sound emissions from the substation plant will be present 24/7 with very little fluctuation over time. The report considers that, based on the current design and operational plant assumptions, acoustic attenuation will be required to reduce noise from ventilation plant. Final mitigation measures will be determined during the detailed design of the substation. A planning condition requiring submission of, and compliance with, an updated operational noise assessment in accordance	Noting that application 77453 has been withdrawn WCOWL can confirm that meetings have been held with the 77453 applicant, and it has been agreed that the two applicants will work together to share information on their applications, including results of any relevant assessments. WCOWL are also in advance discussions with the landowner to purchase the land required for the substation. The residential development proposal may therefore require some design readjustments around WCOWLs substation area. Should a revised finalised design be made available for the residential proposal, WCOWL will ensure appropriate noise assessment and mitigation is implemented as part of the detailed design of the substation, and agreed with the Local Planning Authority.

Consultee	Summary of comments	The Applicant's response
	with BS4142:2014+A1:2019 will be required. The residential Noise Sensitive Receptor (NSR) locations considered within the report do not include those that might be created via Planning Application 77453. We recommend the Applicant be asked to provide additional information to clarify how those proposals might affect this application. Environmental Health recommend any planning permission includes a condition to ensure further substation design, noise mitigation and noise assessment works are undertaken and agreed by the LPA.	WCOWL are in support of the recommended planning conditions from the Environmental Health Officer at North Devon Council requiring the provision an updated operational noise assessment, with further substation design, noise mitigation and noise assessment works agreed by the LPA.

6.8 Traffic and Transport

208. The assessment of effects on traffic and transport are covered within Chapter 19: Traffic and Transport of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 19.A: Transport Assessment
- Appendix 19.B: Outline Construction Traffic Management Plan.

209. Comments were received from the following consultees in relation to Chapter 19, their comments and the responses are summarised in **Table 6.10** below:

- Devon County Council
- Fremington Parish Council
- Heanton Punchardon Parish Council
- Instow Parish Council
- North Devon Biosphere
- North Devon Coast Areas of Outstanding Natural Beauty
- Torridge District Council.

Table 6.9 Consultation responses to Chapter 19 Traffic and Transport

Consultee	Summary of comments	The Applicant's response
Devon County Council	DCC raise no objection on matters relating to highways subject to the imposition of a suitable planning condition that prior to the commencement of development, including any site clearance, groundworks or construction), a Construction Traffic Management Plan (CTMP) to manage the impacts of construction during the life of the works, shall be submitted to the Local Planning Authority for approval.	An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. WCWOL are supportive of a condition being imposed to provide a final CTMP prior to the commencement of any site works.
Fremington Parish Council	The council requests no traffic to or from site at weekends of bank holidays and only between the hours of 10am and 3pm to avoid congestion on the already congested local road network. The Parish Council would question the appropriateness of vehicles travelling past the chalet properties in Instow and asks that fill material for the site is brought in by boat wherever possible.	**Chapter 5: Project Description** of the **Onshore ES** the proposed working hours for the Onshore Project would be 07:00 – 19:00 Monday to Friday and 07:00 – 13:00 on Saturday. No working is proposed on Sundays or Bank Holidays. The assessment of effects of the Onshore Projects peak traffic demand upon driver delay (capacity) is presented within Chapter 19: Traffic and Transport of the Onshore Environmental Statement and supporting Transport Assessment (Appendix 19.A). The effects of the Onshore Project upon driver delay (capacity) are assessed to be negligible. This assessment is predicated upon a worst case that all materials are brought to site by road. This approach would not however preclude the option to deliver materials by sea to a suitable port. The final approach to deliveries would be developed once a Contractor is appointed through the development of the CTMP.

Consultee	Summary of comments	The Applicant's response
		An OCTMP was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. This includes measures to control working/delivery hours and minimise HGV movements. The OCTMP will be further developed and updated post-consent and submitted to DCC for approval ahead of the commencements of any onsite works. The access route shown through Instow is for the early enabling works, and emergency access during the construction phase only, and won't be utilised by any Heavy Goods Vehicles (HGVs).
Heanton Punchardon Parish Council	Heanton Punchardon Parish Council (HPPC) raised queries for further information around validity of the survey data specifically concerning the Parish, and localised traffic and landscape impacts, and requested for the consultation period to be extended for further clarification.	As outlined in **Chapter 5: Project Description** of the **Onshore ES** none of the construction of the Project will be undertaken within the boundary of Heanton Punchardon Parish. No construction traffic is forecast to travel through the village of Heanton and in the vicinity of the parish, all construction traffic would be routed via the main A361. **Chapter 19: Traffic and Transport** of the **Onshore ES** identifies that during the Projects peak construction phase, traffic upon the A361 to the south of the village of Heanton could temporarily increase by one percent with average changes in traffic being lower. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the

Consultee	Summary of comments	The Applicant's response
		control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project.
Instow Parish Council	Instow Parish Council (IPC) strongly emphasises the following matters: ▪ Access via the Cricket Club should be restricted to vehicles of 3.5 tons or less because of the width of the road and the environmental impact. ▪ Developers to use the current planned access road to Yelland Power Station site. ▪ The negative effect on traffic passing a residential area. ▪ On completion the residential road should be made good.	The access strategy for the Project is outlined in **Chapter 5: Project Description** of the **Onshore ES**. And the access route shown via the Cricket Club is for the early enabling works, and emergency access during the construction phase only, and won't be utilised by any Heavy Goods Vehicles (HGVs). An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project. This includes measures to manage the routeing of HGV traffic. The current proposal is that access for construction traffic to the south of the River Taw will be via the existing access to the Yelland Power Station site and this will be managed and controlled though the OCTMP. However, in the event that the planned access road becomes available this road would be utilised (subject to agreement with DCC). Chapter 19: Traffic and Transport of the Onshore Environmental Statement includes an analysis of locations that could be sensitive to increases in traffic (including residential areas). Having identified locations that could be sensitive to changes in traffic, an assessment of effects of the Onshore Projects peak traffic

Consultee	Summary of comments	The Applicant's response
		demand upon severance, amenity, road safety and driver delay are presented within Chapter 19: Traffic and Transport of the Onshore Environmental Statement. The assessment concludes that there would be no residual significant effects. With regard to highway condition, the Section 4.7 of the OCTMP includes a commitment to repairing any damage to the existing highway network as a consequence of the Onshore Project or providing a financial contribution to DCC to cover the cost of remedial works.
North Devon Biosphere	The works across the rest of the land to the marshes close to the estuary will involve trenched techniques other than where there are larger ditch crossings where trenchless techniques may be used. The haul roads and the traffic on them will cause disturbance to the locals (and potentially visitors) to the area. Whilst we defer to other colleagues specialised in traffic management, the perception is that congestion in Braunton village will increase and have significant impact, as it is at critical levels now where a traffic jam is easily triggered.	The access strategy for the Project is outlined in **Chapter 5: Project Description** of the **Onshore ES**. The temporary haul roads will be entirely within the onshore cable corridor and the construction vehicles will be separated from and have very limited impact the local and tourist traffic. In order to access the haul road the construction vehicles will use the public road network. As assessed in **Chapter 19: Traffic and Transport** of the **Onshore ES** with the implementation of mitigation measures the impacts during the construction phase of the Project on the public road network is no greater than **minor adverse** and **not significant**. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport

Consultee	Summary of comments	The Applicant's response
		effects of constructing the Onshore Project.
North Devon Coast Areas of Outstanding Natural Beauty	The Environmental Statement identifies that there will be a 99% increase in HGV traffic on the road above Saunton Down during the construction period and a maximum 44% increase in all traffic on Sandy Lane on the edge of the AONB during the construction phase. While these effects are temporary, they contribute to the adverse effects on landscape character, qualities and tranquillity noted above.	As assessed in **Chapter 19: Traffic and Transport** of the **Onshore ES** following the implementation of mitigation measures the impacts on amenity on all routes (**Section 19.5.2**) are no greater than **minor adverse**, and therefore **not significant** in EIA terms. An **Outline Construction Traffic Management Plan** (OCTMP) was submitted as **Appendix 19.B** to the **Onshore ES**. The OCTMP details the control measures and monitoring procedures for managing the potential traffic and transport effects of constructing the Onshore Project.
Torridge District Council	The council provide comments on the impact of the proposed development on access, parking and highways with reference to the relevant policies of the NPPF and North Devon and Torridge Local Plan (NDTLP): ▪ Policy ST09 (Coast and Estuary Strategy) ▪ Policy ST10 (Transport Strategy) ▪ Policy DM05 (Highways) The Local Planning Authority would have concern regarding the potential cumulative highway impact, and whether the proposed development would significantly impact the flow of access in and out on the A39, which is the primary route into Torridge, and resultant congestion. The views of the Local Highway Authority will be key in this regard. Additionally, the impacts on the safe cycle and pedestrian routes should be comprehensively	As assessed in **Chapter 19: Traffic and Transport** of the **Onshore ES** following the implementation of mitigation measures the impacts on amenity (**Section 19.5.2**), and road safety (**Section 19.5.4**) are no greater than **minor adverse**, and therefore **not significant** in EIA terms. The Applicant would also direct TDC to the response to the Onshore Application from Devon County Council Highways which raises no objections, subject to the imposition of a suitable planning condition.

Consultee	Summary of comments	The Applicant's response
	assessed in the determination of the planning application.	

6.9 Onshore Landscape and Visual Amenity

210. The assessment of effects on landscape and visual amenity covered within Chapter 20: Onshore Landscape and Visual Amenity of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 20.A: Methodology
- Appendix 20.B: Landscape and Visual Impact Assessment (LVIA) Figures and Visualisations
- Appendix 20.C: Illustrative Viewpoint Photographs
- Appendix 20.D: Lighting Impact Assessment.

211. Comments were received from the following consultees in relation to Chapter 20, their comments and the responses are summarised in **Table 6.11** below:

- Heanton Punchardon Parish Council
- Natural England (see **Appendix B** for comments and responses)
- North Devon Biosphere
- North Devon Coast Areas of Outstanding Natural Beauty
- The South West Coast Path Association
- Torridge District Council.

Table 6.10 Consultation responses to Chapter 20 Landscape and Visual Amenity

Consultee	Summary of comments	The Applicant's response
Heanton Punchardon Parish Council	Heanton Punchardon Parish Council (HPPC) raised queries for further information around validity of the survey data specifically concerning the Parish, and localised traffic and landscape impacts, and requested for the consultation period to be extended for further clarification.	As outlined in **Chapter 5: Project Description** of the **Onshore ES,** none of the construction of the Project will be undertaken within the boundary of Heanton Punchardon Parish. The assessment of the potential impacts of the Project on landscape and visual amenity are presented in **Chapter 20: Landscape and Visual Amenity** of the **Onshore ES**. No specific landscape or visual amenity impacts have been identified from the Project within

Consultee	Summary of comments	The Applicant's response
		the area around Heanton Punchardon.
North Devon Biosphere	Landscape assessment; the assessment has not be carried out to the degree expected in this sensitive area. The applicants have not taken into account the cumulative impact of the transformer housing along with the already consented but not yet build housing development at Yelland. This will have a cumulative impact on the landscape setting in the estuary and the adjacent AONB. Better landscape impact and mitigation is needed for the transformer site proposed at Yelland.	The assessment of the impacts of the Project on the North Devon AONB, as well as other landscape designations and defined areas is provided within **Chapter 20: Onshore Landscape and Visual Amenity** of the **Onshore ES**. This includes an assessment of the potential cumulative effect of the Project alongside the Yelland Quay development. Further detail of the proposed mitigation measures are set out in **Appendix N Outline Landscape and Ecological Management Plan** of this **ES Addendum**.
North Devon Coast Areas of Outstanding Natural Beauty	LANDSCAPE EFFECTS Chapter 20 of the Environmental Statement considers landscape effects. Effects are based on an assessment of sensitivity that takes into account the high value of AONB designation. Assessment of magnitude of change and overall effect is reasonable. In summary moderate-minor adverse effects are predicted to special qualities "Distinctive Coastal Scenery" and "A landscape and seascape of high visual quality" during the construction and decommissioning phases (as shown in Table 20.24 in the LVIA). Adverse landscape effects are predicted during construction, in the AONB they are not considered significant. The cable would come ashore at Saunton Sands, where a trench would be excavated across the beach to the car park. The project description states that cable laying will be carried out incrementally and suggests that the beach will be affected for only	The Applicant acknowledge the comments and notes that the North Devon Coast Areas of Outstanding Natural Beauty accepts that while there is the potential for the impacts during the construction phase of the Project to be of major adverse significance these are only temporary, short-term and reversible. Further details of the proposed works at landfall at Saunton Sands is provided in **Appendix Y: Outline Cable Landfall Plan** of this **ES Addendum**. This provides further details of the proposed works, including a programme which provides further information to confirm that any impacts would be short-term. During the operations and maintenance phase of the Project the only permanent above ground infrastructure would be the White Cross Onshore Substation. As detailed in **Section 20.4.4** of **Chapter 20: Onshore**

Consultee	Summary of comments	The Applicant's response
	a matter of days, not months, for this work. Saunton Sands car park will be used as the base for trenchless cable laying plant that will lay a cable under the dunes and coastal farmland eastwards to Sandy Lane, without physical disruption to the surface. We have not found an estimate of the time scale for the trenchless excavation rig in the submitted documents, so have assumed a worst case of 18 months. The assessment of moderate – minor adverse effects in relation to this element of the cable construction seems reasonable. For the remainder of the onshore route in the seeing of the AONB, there would be localised very low level temporary indirect effects on views out from the AONB, comprising materials stockpiles, fencing and some vegetation removal. These are not considered to be significant. The onshore substation is outside the AONB boundary but would result in changes to views to the inland setting of the AONB. Moderate minor adverse effects are predicted in relation to Special Qualities "Distinctive Coastal Scenery" and "A landscape and seascape of high visual quality" during construction and in operation. Mitigating planning is proposed. The substation is close to the Yelland Quay development. No significant cumulative effects are predicted on the special qualities of the AONB for either the cable route or the substation. Landscape character assessments for the area identify the effects of onshore renewable energy developments as a force for change. Landscape strategies and	**Landscape and Visual Amenity** of the **Onshore ES** mitigation measures have been embedded into the design, including woodland planting around Onshore Substation to provide screening, and hedgerows and scrub for landscape and ecological connectivity. Further details of the proposed landscaping mitigation measures, including of the ongoing maintenance requirements, are set out in **Appendix N: Outline Landscape and Ecological Management Plan** of this **ES Addendum**. To provide additional mitigation a **Substation Design Code** was submitted as **Appendix B** to the **Design and Access Statement** that formed part of the planning application. This seeks to minimise potentially adverse impacts, as well as creating development which is sympathetic to its local context. With the implementation of these embedded and additional mitigation measures, the impacts during the operation and maintenance phase of the Project will be no greater than **moderate-minor adverse** and therefore **not significant** in EIA terms.

Consultee	Summary of comments	The Applicant's response
	guidelines include guidelines aimed at protecting the high scenic quality of the landscape and the open quality of the Estuary. VISUAL EFFECTS During the construction phase of the cable route, major adverse visual effects are predicted on users of Saunton beach close to the excavation and rig site and the South West Coast Path (SWCP) at Broadsands. Major – moderate adverse effects are predicted on the users of the SWCP south of Saunton Sands hotel and within 0.5km of the excavations. These effects are considered to be significant adverse. During construction of the substation, moderate adverse effects are predicted on people visiting Northam Burrows, with moderate minor adverse effects from various viewpoints in Braunton Burrows within the AONB. At year 15, these effects reduce to moderate – minor adverse and are not considered to be significant. ADVERSE EFFECTS IN RELATION TO THE AONB MANAGEMENT PLAN 2019-2024 Management Plan policy A1 requires decision makers to "Ensure that the landscape character, natural beauty and special qualities of the AONB are conserved, enhanced and fully respected in all decisions affecting the Area", policy A4 "Recommend that no development should be permitted inside or outside the AONB that would harm the natural beauty, character or special qualities of the AONB" and policy A5: "Ensure developments comply with the North Devon Landscape	

Consultee	Summary of comments	The Applicant's response
	and Seascape Character Assessments". In light of the adverse effects predicted on visual amenity and landscape elements, the proposal would not meet the requirements of these policies. The effects would be significant during the construction stage but would reduce with time.	
The South West Coast Path Association	While we do not object to the application, having reviewed the Environmental Statement (ES) and in particular Chapter 20, the Landscape and Visual Appraisal, we have the following comments to make. The Association is pleased to see that the ES has assessed the impacts on users of the SWCP and Tarka Trail, open access land and public rights of way. We note that the ES identifies significant visual effects as a result of the installation of the landfall to MLWS and Onshore Export Cable Corridor for localised sections of the SWCP for example at Saunton Downs, Saunton Sands, north of the River Taw near Crow Beach House and south of the river to the north of the existing East Yelland substation. We understand that the key significant impacts on the SWCP and where appropriate the England Coast Path (ECP) will be during the construction and installation phases of the project. There should be an emphasis during this stage on preserving the continuity of the SWCP/ECP and a requirement for any temporary management measures such as path diversions, local restrictions, exclusions and alternative routes to be discussed and agreed at an early stage with the SWCPA, Devon County Council and the	An assessment of the impact of the Project on public rights of way (including the SWCP) is provided in **Chapter 15: Land Use** of the **Onshore ES. Appendix 15.A: Outline Public Rights of Way Strategy** sets out how access will be maintained throughout construction in order to mitigate the impacts from construction. This will be further developed as part of the Construction Environmental Management Plan (CEMP) post-consent. Following the completion of the onshore construction the site will be reinstated to match the conditions pre-construction, for example hedgerows removed or coppiced will be replanted or allowed to regrow, and the topsoil will be reinstated across the working area. There will also be landscaping works around the White Cross Onshore Substation as part of the embedded and additional mitigation measures, including the planting of mixed deciduous woodland to the west and south of the substation to mitigate the potential visual effects (see **Section 20.4.4** of **Chapter 20: Onshore Landscape and Visual Amenity** of the **Onshore ES).** Further details of the proposed landscaping mitigation measures,

Consultee	Summary of comments	The Applicant's response
	National Trails team at Natural England. There is a need to protect coastal views and access to the views from the coast path, an objective recognised nationally through the development of the ECP. The maintenance of landscape quality and landscape character as a backdrop to the SWCP/ECP is of importance to its integrity and positive experience of users. As such the Association would like to stress the importance, as recognised in the ES, for any disturbed land cover and habitats to be reinstated with the aim of returning the disturbed ground to its original use. The fabric and National Trail standards of the SWCP/ECP must be maintained in any reinstatement of sections of the coast path that have been temporarily diverted as a result of the onshore works.	including of the ongoing maintenance requirements, are set out in **Appendix N: Outline Landscape and Ecological Management Plan** of this **ES Addendum**.
Torridge District Council	The council provide comments on the landscape impact of the proposed development with reference to the relevant policies of the North Devon and Torridge Local Plan (NDTLP): ▪ Policy ST04 (Improving the Quality of Development) ▪ Policy DM04 (Design Principles) The council concludes that the application site would be located adjacent to an existing industrial use and within close proximity to existing energy distribution infrastructure. It is the opinion of TDC, that the proposed development would not significantly impact the visual or residential amenities of the district and therefore have no further comments to make.	As detailed in **Section 20.4.4** of **Chapter 20: Onshore Landscape and Visual Amenity** of the **Onshore ES** mitigation measures have been embedded into the design, including woodland planting around Onshore Substation to provide screening, and hedgerows and scrub for landscape and ecological connectivity. Further details of the proposed landscaping mitigation measures, including of the ongoing maintenance requirements, are set out in **Appendix N: Outline Landscape and Ecological Management Plan** of this **ES Addendum**. To provide additional mitigation a **Substation Design Code** was submitted as **Appendix B** to the

Consultee	Summary of comments	The Applicant's response
		Design and Access Statement that formed part of the planning application. This seeks to minimise potentially adverse impacts, as well as creating development which is sympathetic to its local context.

6.10 Socio-economics (including Tourism and Recreation)

212. The assessment of effects on socio-economics are covered within Chapter 21: Socio-Economics (including Tourism and Recreation) of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 21.A: Economic Impact Assessment.

213. Comments were received from the following consultees in relation to Chapter 21, their comments and the responses are summarised in **Table 6.12** below:

- Braunton Parish Council
- Devon County Council
- Fremington Parish Council
- North Devon Biosphere
- North Devon Council.

6.10.1 Business Disruption and Compensation Scheme & Community Benefit Fund

214. A number of comments from regulators, statutory consultees and the public were raised in relation to potential impacts to businesses as a result of the construction phase of the Project. Comments also queried whether or not there would be a community benefit fund or other direct benefits such a energy discounts.

215. There will be a business disruption and compensation scheme in place for the White Cross project ahead of the commencement of construction. This scheme will deliver in excess of the statutory compensation code requirements to ensure that no business is worse off as a result of the White Cross construction programme. Details of the scheme and associated criteria for business owners to meet will be shared in due course.

216. White Cross Offshore Windfarm is fully committed to delivering a community benefit scheme in line with UK Government guidance. Initial engagement with local people, businesses and organisations has commenced to identify key themes and projects of local relevance which will deliver strategic benefits to the local community. The process to develop this scheme will be ongoing.

217. The community benefit scheme will focus on community wide benefits and will not include direct benefits to individual households via electricity bill discounts. This is in line with Government intention not to include undergrounded onshore electricity transmission cables within the direct benefit scope due to the lower long-term impact of this type of infrastructure on the communities hosting it.

Table 6.11 Consultation responses to Chapter 20 Landscape and Visual Amenity

Consultee	Summary of comments	The Applicant's response
Braunton Parish Council	The proposed onshore cable route would have a significant detrimental impact on the community in terms of loss of tourism, disruption to local social-economics, adverse effect to the natural environment including the Northern Devon UNESCO Biosphere and Buffer Zone for the core dune system.	Assessment of the impacts of the Projects on socio-economics, including tourism, was presented in **Chapter 21: Socio-economics, Tourism and Recreation** of the Onshore ES. This assessed minor adverse effects on tourism and recreation during the onshore construction, and operations and maintenance phases of the Project. Additionally WCOWL has been liaising with the local businesses / landowners to ensure appropriate compensation is arranged for to account for any losses during construction (see **Section 6.10.1** above).
Devon County Council	It is noted that there will be a temporary loss of parking provision at Saunton Sands car park during the construction phase. It is understood that parking provision within this location will be reinstated following construction works. In order to ensure the impact on the local economy is minimised, it is recommended that the Local Planning Authority secure the car park's reinstatement with no net loss of spaces and that	WCOWL acknowledges DCC's comments regarding re-instatement of the car park at Saunton Sands, further detail of the proposed works at Saunton Sands is provided in **Section 5.2** of this **ES Addendum**. WCOWL are exploring options for the provision of an alternative car park during the works as detailed in **Section 5.2** of this **ES Addendum**.

Consultee	Summary of comments	The Applicant's response
	construction is kept to a minimum during main holiday periods.	
	Should there be any negative impacts on businesses, adequate compensation should be provided taking into account the strongly seasonal nature of the businesses in Saunton.	Assessment of the impacts of the Project on socio-economics, including tourism, was presented in **Chapter 21: Socio-economics, Tourism and Recreation** of the **Onshore ES**. This assessed minor adverse effects on tourism and recreation during the onshore construction, and operations and maintenance phases of the Project. Additionally WCOWL has been liaising with the local businesses / landowners to ensure appropriate compensation is arranged for to account for any losses during construction (see **Section 6.10.1** above).
	It is recommended that screening is provided at the Yelland sub-station to ensure any visual impacts are minimised for users of the Tarka Trail and for other leisure and tourism users of the estuary and Braunton Burrows.	Tree planting is proposed around the substation area to provide screening as mitigation for visual impact. Further information is provided in an **Outline Landscape and Ecological Management Plan** submitted as **Appendix N** to this **ES Addendum**.
	Finally, it is recommended that the Local Planning Authority considers the wider grid capacity in Northern Devon at a strategic level. This is to ensure that the UK and Northern Devon can gain maximum benefit from both increased low carbon power generation and gains in economic impact, particularly locally.	Whilst recognising that that comment was addressed at NDC WCOWL can confirm that they have and will continue to undertake extensive engagement with the supply chain across Northern Devon and the southwest in order to identify opportunities to increase the beneficial impacts to the economy of the local area and wider region. More information on the need for the can be found in **Section 1.2** above and **Chapter 2: Need for the Project** of both the Onshore and Offshore ES.

Consultee	Summary of comments	The Applicant's response
Fremington Parish Council	The proposal will increase local employment opportunities and the Parish Council would like to see that this parish and adjoining parishes benefit from energy discounts as a result of the scheme.	WCWOL welcome the comment and recognition of the potential beneficial socio-economic impacts of the Project. WCOWL are committed to delivering a community benefit scheme in line with UK Government guidance (see **Section 6.10.1** above).
North Devon Biosphere	We recognise that the development and even the landfall of the project at Saunton Sands will have negligible impact on the wave climate in the surfing beaches of the Biosphere and the World Surfing Reserve. However, more consideration needs to be given to the timing of operations here to avoid the impact on the visitor economy of the area.	Assessment of the impacts of the Project on socio-economics, including tourism, was presented in **Chapter 21: Socio-economics, Tourism and Recreation** of the **Onshore ES**. This assessed minor adverse effects on tourism and recreation during the onshore construction, and operations and maintenance phases of the Project. Further detail of the proposed works at Saunton Sands, including the timings of the works and measures to minimise the impact on the visitor economy is provided in **Section 5.2** of this **ES Addendum**. WCOWL are exploring options for the provision of an alternative car park during the works as detailed in **Section 5.2** of this **ES Addendum**.

6.11 Human Health

218. The assessment of effects on human health are covered within Chapter 22: Human Health of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 22.A: Baseline Information.

219. Comments were received from the following consultees in relation to Chapter 22, their comments and the responses are summarised in **Table 6.13** below:

- Environmental Health Officer (North Devon Council).

Table 6.12 Consultation responses to Chapter 22 Human Health

Consultee	Summary of comments	The Applicant's response
Environmental Health Officer (North Devon Council)	Environmental Health have no grounds to doubt the conclusions reached in regard to Electromagnetic Fields (EMFs): • The development will only incorporate equipment that is designed and installed in compliance with relevant exposure limits and standards. To ensure this, all equipment capable of producing EMFs will be assessed in accordance with the provisions of the UK Government's Code of • Practice on Compliance which incorporates compliance with the International Commission on Non-ionizing Radiation Protection 1998 Guidelines for limiting exposure to time-varying electric, magnetic and EMFs (up to 300 GHz). • The assessment finds that the proposed onshore export cable corridor and onshore substation would not create any plausible source-pathway-receptor relationships and that there would therefore be no likely significant population health effects for the general population or for vulnerable groups as a result of EMFs.	WCOWL note Environmental Health have no comments to make specifically on the topic of human health in relation to EMFs. Comment on Human Health in relation to Air Quality are presented and responded to in **Table 6.2** of this **ES Addendum**. Comment on Human Health in relation to Noise and Vibration are presented and responded to in **Table 6.9** of this **ES Addendum**.

6.12 Climate Change

220. The assessment of effects on climate change are covered within Chapter 23: Climate Change of the Onshore Environmental Statement, the chapter was supported by the following appendix:

- Appendix 23.A: Greenhouse Gas Assessment Methodology.

221. Comments were received from the following consultees in relation to Chapter 23, their comments and the responses are summarised in **Table 6.14** below:

- North Devon Coast Areas of Outstanding Natural Beauty.

Table 6.13 Consultation responses to Chapter 23 Climate Change

Consultee	Summary of comments	The Applicant's response
North Devon Coast Areas of Outstanding Natural Beauty	CLIMATE CHANGE EFFECTS Chapter 2 of the Environmental Statement sets out the need for the project in the context of the need to address climate change and the local and national policy context. The contribution that the windfarm (including the onshore works) would make to national targets are set out. White Cross would contribute 100MW of the government target of 5GW from onshore floating wind. The UK has a target of 50GW from onshore wind generation by 2030, of which nearly 14GW is already commissioned (Dept for Business and Trade figures). Both the AONB Management Plan and published landscape character assessments recognise the potential for climate change to impact landscape & seascape, coastal and marine habitats. Forces for Change identified for the Landscape Character Types (LCT) in the AONB that will be affected by the proposals include: • LCT 4A Estuaries: Sea level rise and coastal erosion as a result of climate change, resulting in a significant rise in the estuary's water levels and a consequential widening of its channels. • Future climate change modelling predicting that by 2100, most spring tides will breach the current good defences protecting settlements and farmland along the estuary fringes.	The Applicant acknowledge the comments and notes that the North Devon Coast Areas of Outstanding Natural Beauty recognise the contribution that the Project will have towards mitigating the long-term and irreversible effects of Climate Change. As outlined in the Applicants response to comments on Onshore Landscape and Visual Amenity (**Table 6.11** above) the impacts during the construction phase of the project are temporary, short-term and reversible. And, with the implementation of embedded and additional mitigation measures, the impacts during the operation and maintenance phase of the Project will be no greater than **moderate-minor adverse** and therefore **not significant** in EIA terms.

Consultee	Summary of comments	The Applicant's response
	• LCT 4B Marine Levels and Coastal Plains: Sea level rise and coastal erosion as a result of climate change, resulting in rising water levels across Braunton Marsh and more frequent good events, affecting the agricultural viability of the area and the composition of valued semi-natural habitats. • LCT 4E Extensive Intertidal Sands: Sea level rise and coastal erosion as a result of climate change, leading to a gradual retreat of the coastline and potential loss of valued habitats and coastal archaeology, • LCT 4F Dunes: Sea level rise and coastal erosion as a result of climate change, leading to a gradual retreat of the coastline and erosion of the sand dunes to the old cliff base. The dunes' protective functions for coastal flooding might also be compromised. For all LCTs, landscape guidelines include a reference to the need to plan for climate change "Plan for the future impacts of climate change, particularly as a result of sea level rise and coastal erosion, allowing natural processes to take place wherever possible whilst ensuring that local communities are involved in making decisions about their future landscape." <u>POSITIVE EFFECTS ON AONB MANAGEMENT PLAN POLICIES</u> The Environmental Quality and Climate Change objective of the AONB Management Plan includes polices that would support the development.	

Consultee	Summary of comments	The Applicant's response
	Policy D1 "Increase understanding, adaptation and mitigation of climate change impacts on coastal landscapes and communities" and policy B2 "Identify and address actual and potential impacts on biodiversity from invasive species, disease and climate change". The development would contribute to mitigating and reducing the effects of climate change on the wider region, including the AONB. In the long term, the development would contribute towards policies aimed at conserving natural beauty and landscape character through aiming to reduce the effects of landscape change as a result of climate change (policies A1, A4 and A5).	

6.13 Major Accidents and Disasters

222. The assessment of effects on major accidents and disasters are covered within Chapter 24: Major Accidents and Disasters of the Onshore Environmental Statement.

223. Comments were received from the following consultees in relation to Chapter 23, their comments and the responses are summarised in **Table 6.15** below:

- Devon and Cornwall Police
- Health and Safety Executive: Land Use Planning.

Table 6.14 Consultation responses to Chapter 24 Major Accidents and Disasters

Consultee	Summary of comments	The Applicant's response
Devon and Cornwall Police	Any planting must not reduce surveillance opportunities in the long term be these natural or by CCTV, therefore, an ongoing maintenance programme must also be implemented. I would also advise that a perimeter detection system (PIDS) is linked with the CCTV to provide a real time alert to any intrusion, this would be essential if the proposed sitewide	Screening of the major accidents and disasters with the potential to occur in relation to the Projects is provided in **Chapter 24: Major Accidents and Disasters** of the **Onshore ES**, and **Chapter 26: Major Accidents and Disasters** of the **Offshore ES**. WCOWL acknowledges these comments and will consider them within the security, lighting and

Consultee	Summary of comments	The Applicant's response
	security fence is not to be to a tested/certificated standard. The threat of immediate response to any criminal/unauthorised intrusion, combined with the CCTV recording, is often more likely to deter criminals from pursuing any further action. A passport for compliance document previously known as an Operational Requirement should be drawn up prior to installation to ensure any system will be fit for purpose. This site may not need that many cameras but would advise that any system has the capacity to install more cameras at a later stage. CCTV should be designed in co-ordination with external lighting and landscaping, and have a recording format that is acceptable to the Police of evidential quality if intended for prosecution. CCTV systems may have to be registered with the Information Commissioners Office and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Where appropriate, individual buildings/containers within the site, for example storage facilities, should also be protected by an intruder alarm. This should be monitored and compliant with National Police Chiefs Councils current guidance. Given there would likely be various sites during any construction phases, its important these site are also suitably protected and monitored to reduce the opportunities for theft, damage and disruption.	landscaping elements of the detailed design. The recommendation for inclusion of appropriate security fencing and CCTV at the proposed substation, including during the construction phase, is also noted.
Health and Safety Executive: Land Use Planning	Wind turbines and the offshore windfarm electricity export cable are usually not a relevant development in relation to land-use planning in the vicinity of	Screening of the major accidents and disasters with the potential to occur in relation to the Projects is provided in **Chapter 24: Major Accidents and Disasters** of the **Onshore ES**, and **Chapter 26:**

Consultee	Summary of comments	The Applicant's response
	major hazard sites and major accident hazard pipelines. This is because they do not, in themselves, involve the introduction of people into the area. However, if the proposed development is located within a safeguarding zone for a HSE licensed explosives site then the HSE's Explosives Inspectorate should be contacted.	**Major Accidents and Disasters** of the **Offshore ES**. The assessments demonstrated that for all of the potential major accidents and disasters screened in for assessment the residual risk, following the implementation of embedded mitigations, was As Low As Reasonably Possible (ALARP).

7. Response to comments on the Offshore Project

224. As set out in **Section 2.3** the responses to the Offshore Application were collated by the MMO and provided to the Applicant in two documents. Therefore, to aid the MMO in their review of responses the same structure has been used by WCOWL, with detailed responses to NE comments (see **Section 2.4**) provided in **Appendix A: Response to Natural England**; and detailed responses to comments from all other statutory and non-statutory consultees provided in **Appendix B: Response to MMO.** The responses provided in **Appendix B** cover the following topics:

- Marine and Physical Processes
- Marine Water and Sediment Quality
- Benthic and Intertidal Ecology
- Fish and Shellfish Ecology
- Marine Mammal and Marine Turtle Ecology
- Offshore Ornithology
- Commercial Fisheries
- Shipping and Navigation
- Marine Archaeology and Cultural Heritage
- Civil and Military Aviation
- Infrastructure and Other Users
- Offshore Seascape, Landscape and Visual Amenity.

225. The response to comments received on the Offshore Application from Natural England and the Environment Agency are provided in separate appendices:

- **Appendix A: Response to Natural England**
- **Appendix C: Response to the Environment Agency.**

8. References

The Crown Estate (2023) Information Memorandum Celtic Sea Floating Offshore Wind Leasing Round 5. Available at: Information_Memorandum.pdf (ctfassets.net) [Accessed 01 July 2024].