

HND Implementation Plan

Response to feedback from public
consultation

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1 Introduction

Document Purpose

This document has been created to provide a response to the feedback received following the public consultation held on the Holistic Network Design Implementation Plan. This document gives an overview of the consultation, groups together the main themes arising from the comments received and provides our response.

Background

The Draft HND Implementation Plan ('The Plan') provides an overview of the Holistic Network Design (HND), and Holistic Network Design Follow Up Exercise (HNDFUE) carried out under the Offshore Transmission Network Review (OTNR). The Plan is defined as the cumulative offshore network design recommendations from the HND and HNDFUE processes, as of August 2024.

These recommendations are formed of several high-level offshore network designs, the purpose of which is to connect offshore wind projects to the National Electricity Transmission System (NETS). The HND Implementation Plan design represents the combined output of the HND and the HNDFUE design processes, and subsequent impact assessments (IAs). The scale and complexity of this final combined design necessitated a staged approach, with individual designs being produced across four distinct design processes. These recommendations and in scope projects were published by the Electricity System Operator (ESO) (predecessor to the National Energy System Operator (NESO)) within the Pathway to 2030 and Beyond 2030 suite of documents. The individual design recommendations were, in published order:

- [Pathway to 2030 Holistic Network Design](#) July 2022
- [Beyond 2030](#) March 2024
- [Beyond 2030: Celtic Sea](#) August 2024
- [Beyond 2030: INTOG](#) December 2024

Public Consultation

Between November 2025 and January 2026, NESO consulted with the public on our Holistic Network Design (HND) Implementation Plan, and associated environmental reports, to gather stakeholder views, enabling participants to provide their expert views on the Plan and environmental assessments prior to their finalisation.

We invited feedback on the following:

1. The implementation plan.
2. The environmental assessments including the Strategic Environmental Assessment (SEA), Marine Conservation Zone Assessment (MCZa) and Habitats Regulations Assessment (HRA).
3. Recommendations for future consultations.

We promoted our consultation via our website, newspaper articles and notifying stakeholders that had been involved in the development of the Plan through the HND exercises.

The HND Implementation Plan public consultation generated responses from more than 20 organisations across Great Britain and together they have provided a range of valuable feedback and insight about the content of the HND Implementation Plan and environmental assessments. Respondents to the consultation included national government departments, electricity Transmission Owners (TOs), Statutory Nature Conservation Bodies (SNCBs), environmental non-governmental organisations, industry trade associations and offshore wind developers.

Since the consultation closed on the 30 January 2026, we have reviewed all the comments received and used them to inform any necessary updates to the HND Implementation Plan and environmental assessments.

This document sets out a summary of respondent’s feedback, detailing the main areas of feedback. This document does not respond to individual comments made as part of this consultation; we have grouped responses into themes and have provided an annex for some of the more technical responses received.

2 Feedback Themes

Highlights

While there was feedback regarding areas for improvement, there was also a significant amount of positive feedback on various aspects of the HND Implementation Plan. The decision to move beyond appraisals and conduct formal statutory strategic environmental assessments has been widely welcomed, as it supports informed recommendations and the work that was carried out whilst completing the initial design appraisals.

Stakeholders advised that the summary of the Holistic Network Design (HND) process was particularly useful in providing a clearer understanding of the plan development steps. It was also acknowledged that the HND and HND FUE processes represent significant progress in strategic energy planning, as they influence the design of networks early on, leading to positive environmental outcomes. They noted that it is crucial that the lessons learned from these processes are applied to the subsequent Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan (CSNP) processes to ensure the efforts of all involved agencies are worthwhile.

There was also considerable technical commentary in support of the separate documents, highlighting the value of the detailed work undertaken. Additionally, the opportunity to provide feedback was acknowledged and appreciated by consultation respondents.

Our response

We are pleased to hear that our decision to move beyond our original appraisals and conduct formal statutory strategic environmental assessments has been widely welcomed. This approach intended to solidify the extensive environmental appraisals that were carried out throughout the design process, and it is gratifying to see that this effort is valued by stakeholders.

We are also glad that stakeholders found the summary of the HND process particularly useful in clarifying development of the plan. Providing transparency and fostering understanding are key priorities for NESO.

We endeavour to apply the lessons learned from these processes to subsequent strategic energy plans; we will ensure that the insights gained are carried forward to maximise the value of the collective efforts of all agencies involved.

Additionally, we appreciate the recognition of the technical work and value it has added. The positive commonality on these aspects reinforces the importance of detailed and thorough analysis.

We are grateful for the acknowledgement of the consultation process and the opportunity it provided for stakeholders to contribute. Feedback is invaluable in shaping our approach and we remain committed to building on this progress.

Strategic (Plan-Level) vs Project-Level Assessment

Retrospective Application

Several respondents noted the fact that the exercise is retrospective and therefore could have less influence than would be ideal. Some Developers highlighted that project decisions are already advanced or consented, which means the plan-level assessment cannot materially influence outcomes. They outlined that this situation could result in discrepancies between plan-level corridors and project-level designs. This leads to concerns that the plan appears more procedural rather than influential, as its ability to guide project development and outcomes is limited.

The feedback consistently highlighted a desire for more detailed information at the plan level and seeks clarity on why certain key issues are addressed in project-level assessments instead. While many respondents acknowledge the strategic nature of the plan, they suggest that a clearer explanation and justification of the balance between plan-level and project-level assessments would be beneficial.

There is a view that the high-level nature of the information limits the value of the plan as a strategic tool. As a result, unresolved issues are often deferred to individual project assessments, which may not provide the comprehensive overview that a strategic plan is intended to offer.

Implementation of recommendations

Many responses make the case that deferring key decisions to the project level shifts risk and burden further down the line. This approach is seen to weaken the mitigation hierarchy, which traditionally follows the sequence of avoid, reduce, and then mitigate impacts. Additionally, it increases the risk of inconsistent outcomes between projects.

Respondents also highlighted that the plan is not legally binding on developers, which means it cannot guarantee the delivery of mitigation measures identified at the plan level. This raises questions about the reliability and enforceability of the plan's recommendations. The need for clarity around responsibilities among NESO, developers, Transmission Owners, and consenting authorities was requested. Statutory bodies expressed concerns about whether non-binding mitigation can be confidently relied upon in HRA conclusions, suggesting a need for greater certainty and legal enforceability in the plan's framework.

Our response

Retrospective Application

We, as the Electricity System Operator (ESO) in 2024 took the decision to conduct a Habitats Regulations Assessment/Appraisal (HRA), a Marine Conservation Zone Assessment (MCZa) and a Strategic Environmental Assessment (SEA) for the latest HND and HNDfUE recommendations (as of August 2024). Although not included as part of the original HND and HNDfUE commission, in consultation with our environmental stakeholders we considered these assessments are an appropriate level of environmental assessment at a strategic planning level. While the HND and HNDfUE environmental and community appraisal process was built upon the principles of an SEA, the scale and complexity of this final combined design necessitated a staged approach. By commissioning these environmental assessments, NESO were able to formalise this appraisal process, while allowing for possible net impact of our design recommendations to be assessed.

Implementation of recommendations

The law will require developers to implement relevant measures through project level environmental assessment processes, such as HRA, and that will include measures such as those identified in the Implementation Plan Appropriate Assessment as being suitable. The purpose of the mitigation section in the Appropriate Assessment is to confirm that subject to detailed development there are mitigation measures which have been successfully applied before and should be able to be applied for these projects. Moreover, because the Plan is not binding on developers it also means that ultimately there is complete scope for Adverse Effect on Integrity (AEIOI) to be avoided or adequately mitigated at the project level because there is freedom for the developer to design around constraints.

The status and purpose of the documents in planning is to provide mitigation recommendations for developers.

More information

Further information is outlined within our HND Implementation Plan, Environmental Assessments, and our HND Implementation Plan FAQ document issued alongside the suite of reports during the public consultation. We have also included a section on 'Future Project Development and Consenting' within the HND Implementation Plan which outlines the distinction between the strategic nature of the HND Implementation Plan and the subsequent project level developments. A figure has also been produced within the HND Implementation Plan to clearly illustrate how roles and responsibilities vary across the development of an offshore wind farm cabling project - from initial strategic recommendations through to detailed project development and consenting.

It is acknowledged that following the design recommendations made in the HND and HNDFUE publications, the in scope projects are now progressing the development of their individual projects. Final designs may not follow the study corridors identified by this Implementation Plan. Due to the nature of the HND/HNDFUE recommended designs, where designs were more advanced in the planning and consenting process, NESO carried out targeted Developer engagement throughout the development of the draft HND Implementation Plan and associated environmental assessments. We encouraged feedback from the developers at all stages, taking feedback into account.

Cross Plan Alignment

A significant theme is alignment between strategic plans, specifically the Holistic Network Design (HND), the Strategic Spatial Energy Plan (SSEP), and the Centralised Strategic Network Plan (CSNP). Stakeholders emphasised that the HND Implementation plan should not operate in isolation but should clearly demonstrate how it integrates with the SSEP and CSNP as these plans evolve. There was a concern that the offshore elements (HND/HNDFUE) and onshore elements (CSNP) were due to be assessed separately, although their impacts are cumulative. Stakeholders requested explicit guidance on how conclusions, assumptions, and constraints are being shared between plans.

Another key area is the consistency of environmental assessments across plans. Stakeholders pointed out inconsistencies in how impacts and mitigation are treated in Strategic Environmental Assessments (SEA), Habitats Regulations Assessments (HRA), and Marine Conservation Zone (MCZ) assessments across different plans. They advocate for common baselines and clear explanations when assumptions differ. Without this consistency, there is a risk of fragmented project-level consenting, forcing developers and regulators to reconcile conflicting signals from different plans.

Finally, there is a call for clarity on the relationships between plans and between projects. Stakeholders' express uncertainty about the weight and influence of plan-level conclusions at the project level, how project-level changes feed back into future plan updates, and the division of responsibilities among NESO, developers, Transmission Owners, and consenting authorities. They suggest the need for clearer, potentially visual, explanations of how HND, SSEP, and CSNP relate to one another throughout their lifecycle, from strategic design to consenting and delivery.

Our response

The nature of previous offshore design exercises necessitated a staged approach, and NESO appreciates the feedback for areas of continued improvement. The vast majority of the onshore elements were considered to be wider works and not directly enabling works for the HND/HNDFUE plan. It was therefore deemed that several of these onshore reinforcements would need to be reassessed in the CSNP. This provided us with sufficient confidence that incorporating onshore reinforcements into the CSNP and its associated environmental assessments was the

appropriate timing. The future strategic energy plans (SEP) will supersede the previous design processes and will include feedback loops between and within SEP plans going forward.

We recognise the importance of ensuring that the plans being developed in SEP are not developed in isolation. We are committed to providing clear guidance on how assumptions, constraints and conclusions are shared and aligned across the plans as they evolve. Learnings from the HND have and will continue to be shared across SEP.

Stakeholder engagement

Several stakeholders recognised the efforts NESO had taken to ensure stakeholder engagement remained at the centre of the development of HND and HND FUE, the overall HND Implementation Plan, and environmental assessments. Many stakeholders also recognised and appreciated where their previous comments and recommendations had been taken on board.

A few stakeholders expressed that engagement occurred too late and with a top-down approach. They felt that engagement was initiated after key decisions had already been made, limiting their ability to influence outcomes. There was a call for earlier involvement, particularly during the option development and scoping stages.

Stakeholders requested clearer audit trails to show what feedback had been accepted, what was not, and the reasons behind these decisions. There were several positive acknowledgements on the inclusion of a SEA comment log, which provided an overview of comments and responses received during the initial SEA scoping phase.

Some stakeholders submitted responses via email and requested that this method be formally supported in future consultations to allow for more comprehensive input into the consultation due to character limits within the online forms.

Regional stakeholders felt that local knowledge was under-represented, especially where impacts are highly place specific. There were requests for regionally focused engagement processes, in addition to national-level consultations, to ensure local perspectives are adequately considered.

Stakeholders highlighted opportunities to improve coordination across plan consultations, particularly around timing, scope and feedback loops.

Our response

The HND Implementation Plan was created following the completion of the Holistic Network Design (HND), HND Follow up Exercise (HND FUE), Celtic Sea and INTOG (Innovation Targeted Oil and Gas) where a vast amount of stakeholder engagement had already taken place with a wide variety of stakeholders. Consultation was carried out during the development of the design

appraisal exercises as well as during the initial screening, scoping and assessment stages of the environmental assessments. NESO have gone beyond all statutory requirements in consultation of the design exercises and HND Implementation Plan. Further detail on the engagement carried out in the appraisal stage of the design exercises can be found in our [Stakeholder Approach, Engagement and Feedback Report](#).

In addition to this feedback document, we are considering how best to approach sharing responses received. One way in which we are doing this is by having a technical annex at the end of this document which goes into further detail on specific questions. As part of the SEA Post Adoption Statement, a high level comment log with responses will be produced as an appendix. This will cover not only the SEA related comments but also wider comments and responses relating to the HND Implementation Plan, HRA and MCZa.

During the HND public consultation, stakeholders were able to submit feedback in several ways to ensure the online form did not constrain their ability to engage. This included the option to provide a written response to our NESO postal address, as well as offering the option to email a response as an attachment using our NESO consultation email address,

We appreciate and acknowledge the feedback given on the how stakeholders feedback and when. The depth and breadth of feedback that has been requested from environmental and wider stakeholders across NESO is extensive and we continue to utilise feedback we have received to help inform other processes being undertaken.

Stronger Cumulative and in Combination Impact Assessment

Consultees from various stakeholder groups highlighted the approach to cumulative and in-combination effects across each of the environmental assessments. Some views expressed that the current approach is high-level, not fully reflecting the spatial realities, especially in areas with multiple connections.

Stakeholders expressed a need for cumulative assessments to be more explicit and spatially defined. They advocate for these assessments to be integrated into the main body of the Implementation Plan and SEA, rather than being in the appendices or described only in high-level narrative terms. There is strong support for providing summaries of cumulative effects by specific hotspot areas, such as locations where multiple routes converge. Stakeholders emphasise the importance of clear statements regarding the significance or acceptability of cumulative effects in these locations.

Stakeholders raised the generic treatment of cumulative effects within the assessments. It was noted that these sections are often high-level and qualitative, focusing on national scope rather than local interactions. They feedback that routes are assessed largely in isolation, and the combined pressure from multiple connections in the same area is underrepresented. This left stakeholders uncertain about whether cumulative effects are genuinely acceptable or untested. They request that spatially defined cumulative conclusions, especially in constrained areas like Lincolnshire, Peterhead, the Celtic Sea, and east coast landfalls, be presented consistently and summarised in plain English for better understanding by developers, regulators, and communities.

Stakeholders raised that a common regulatory issue is that cumulative assessments should be conducted at the plan level, as this is where holistic, cross-project effects can be addressed. Deferring these assessments to project-level Environmental Impact Assessments (EIAs) risks inconsistency and missed opportunities for strategic mitigation and avoidance. Stakeholders noted that plan-level assessments are crucial for understanding and managing cumulative impacts before routing decisions are made.

The cumulative effects on fisheries and marine users were also highlighted. Stakeholders raised the impacts on fishing grounds, displacement, safety, long-term access, and economic viability. These organisations called for strategic cumulative modelling and consideration of long-term and sequential cabling impacts, especially when cabling intersects with other infrastructures like offshore wind, marine protected areas, oil and gas, and carbon capture and storage.

Our response

The SEA Environmental Report has further examined and expanded the spatial consideration of potential cumulative effects of development within identified route corridors of the Plan, as well as the potential for in-combination effects with other existing and planned infrastructure. To bring cumulative conclusions into the core narrative of the SEA, Section 9.2.1 Cumulative/In-combination effects has been expanded to include reference to planned offshore transmission reinforcements and consideration of designated site avoidance. For cumulative/in-combination effected with other strategic-level plans, additional text has been added to expand on the potential interaction and in-combination effects, whilst also recognising that there is insufficient detail to fully assess the cumulative and in-combination effects at this strategic level, as there are no confirmed designs or methodologies for each of the cable routes. Relevant plans and projects should be considered and assessed further for the potential for cumulative and in-combination effects at the project level. Recommendations have been made towards dealing with these potential cumulative issues, which have also been fed through into the Plan.

In accordance with the relevant HRA legislative test, in-combination assessment is required only where adverse effects on integrity (AEOI) have been excluded for the HND Implementation Plan alone. The plan-level assessment has only concluded no AEOI where either (i) no impact

pathway exists, or (ii) mitigation at project level would address potential effects. The assessment has not relied on impacts (with or without mitigation) falling below quantitative thresholds (e.g. a particular noise threshold) that could subsequently be exceeded by multiple projects in combination. Therefore, if a pathway of impact exists, the HRA has identified the need for mitigation and the measures available to avoid an adverse effect on integrity.

The mitigation measures identified throughout the HRA and MCZa reports for the identified 'alone' impacts would be capable of addressing the contribution of the HND Implementation Plan to 'in combination' effects with other plans and projects, with the exception of a small number of corridors which were taken forward to derogations. The same types of measures would also address the contribution of the projects in the HND Implementation Plan to 'in combination' effects with other plans and projects to an acceptable level. For example, if two cables or projects result in noise impacts on the same European site, the identified noise control measures identified in this report (e.g. seasonal avoidance, noise reduction techniques) can be employed to render both acceptable. Therefore, a detailed analysis of the other plans and projects is not necessary to confirm that there are mechanisms available to avoid an 'in combination' effect. The appraisal therefore serves to document the plans and projects screened, rather than to undertake a separate detailed in-combination effects appraisal at plan-level.

Mitigation Hierarchy

Stakeholders emphasised the importance of prioritising avoidance of impacts on sensitive sites from the outset, rather than deferring this consideration to the project design phase. They comment that plan-level decisions should focus on avoiding these areas before proceeding to mitigation or compensation. It was suggested that there may be an over-reliance on project-level mitigation, and that issues could be underestimated on the assumption that they will be addressed later, without certainty that this will be feasible.

While there was broad support for identifying mitigation at the plan level, stakeholders seek clear distinctions between plan-level principles and what will be delivered in projects. They call for transparency about which measures are expected to be implemented. For unavoidable impacts, particularly on benthic habitats and MPAs, there is a request for clear guidelines on when strategic mitigation or compensation is necessary, and assurance that these measures are realistic and timely.

A Fishing group suggested that current mitigation efforts focus too narrowly on environmental aspects, without full consideration of socio-economic impacts. They advocate for avoiding high-value fishing areas rather than relying on mitigation or compensation at a later stage. Stakeholders accepted that not all impacts can be avoided, but they want stronger evidence that decisions are truly driven by the mitigation hierarchy. They asked for more precautionary and explicit planning to reduce risks.

In summary, stakeholders asked for a stronger emphasis on avoidance from the beginning, less reliance on uncertain future mitigation, and clearer communication about what mitigation can realistically achieve.

Our response

Consideration of the mitigation hierarchy, with particular focus on avoidance of designated sites as far as practical, was paramount in the development of the Plan. Through our strategic environmental assessments, avoidance of key constraints where practical was a significant factor in determining reasonable study corridors. An overview of the HND/HNDFUE appraisal process and the Constraint BRAG Ratings are detailed within [Appendix A of the HND Implementation Plan](#). The aim of the Plan and environmental assessments is to guide future developments and mitigation through strategic oversight. Developers will also be required to implement relevant measures through their own environmental assessments.

All strategic mitigation that has been included within the HND environmental assessments is based on a high level of confidence it would be technically feasible for the developer to deliver based on the strategic level of information known. The ultimate feasibility will be determined at a project level when detailed designs are known, and necessary technical and environmental survey work has been conducted. These assumptions are detailed throughout the HND Implementation Plan and environmental reports. The SEA mitigation has taken on board specific recommendations from respondents and clarified that specific mitigation measures will be based on the design detail available at the project stage.

The potential cumulative effects on commercial fisheries have been raised within the cumulative effects and mitigation sections; however economic appraisal is not within the scope of the SEA. The SEA that has been carried out on the HND Implementation Plan was not mandated or required under legislation as the Plan will not have formal weight in planning law. However, NESO will continue to work with the fishing industry in the development of strategic energy planning,

Baselines and monitoring

Baselines

In the feedback stakeholders advise that it's important to use the latest information when assessing plans. They outlined that if outdated information is used, it can misrepresent the current environmental risks, make conclusions less reliable, and cause inconsistencies when compared to project-specific assessments. Therefore, it's essential to include the most recent updates on projects, designs, and related plans to make sure assessments are accurate.

Monitoring

Respondents highlighted that monitoring should not only track how plans or projects are progressing but also compare the actual environmental effects with what was predicted. This could spot any differences and new impacts, allowing these insights to be used for improving future plans and decisions. Monitoring is seen as an important tool to show that strategic planning is flexible and based on evidence.

Stakeholders favour updating plans based on triggers, rather than just relying on set review cycles. This means that plans can be updated when significant new information or impacts come up, keeping them relevant as projects and knowledge develop. Clear definitions of what counts as a "material change" are important for this method to work well.

Overall, stakeholders asked for more transparency about what is known and unknown. They want better connections between monitoring, evidence, and how plans evolve, supporting a more flexible approach that keeps plans relevant as things change.

Our response

Baselines

The HRA and MCZa must relate to the HND Implementation Plan which provides study corridors and does not commit to specific designs or design details. Therefore, while the latest information on projects has been consulted the HRA and MCZa must be an assessment of the HND Implementation Plan and not stray into assessing individual Development Consent Orders (DCO). This is because the HND Implementation Plan deliberately allows flexibility for developers within the study corridors. The assessments have referenced available information from projects but must remain an assessment of the plan (i.e. the parameters set by the 5 km wide study corridors) and not stray into assessing individual developers' proposals, for which there is a separate process. The HND Implementation Plan and its HRA/MCZa are inevitably a 'snapshot' of a point in time, as with any plan. Arguably consented developments could be omitted entirely from the HRA (except in combination) but that would involve frequent changes to the plan. Instead, there is a cycle over which the plan will be updated. Consented wind farms would be included in the 'in combination' assessment (as these are not part of the Plan). If 'transmission

assets are waiting recommendation' then in principle they have not yet been fixed or finalised. It is important that the HRA and MCZ of the plan assess the plan and not the subsequent cable projects which are subject to their own HRAs.

All the mitigation measures discussed in the HRA and MCZa report are known to be effective from other projects. At the plan level, since detailed design information or routes are not set by the HND Implementation Plan, the consideration of mitigation at the plan level is a matter of identifying that effective mitigation solutions exist. They will, however, need tailoring and a more detailed investigation, for each DCO in order to ensure they are designed effectively and if necessary to allow the identification of additional mitigation measures.

Monitoring

With regards to monitoring, the "HND Implementation Plan Iteration Schedule" has been expanded to provide more detail on the future monitoring phases and expectations around how changes, such as individual HND/HNDFUE project updates or wider industry knowledge, will be captured. This also captures 'triggers' or 'material changes' that would result in the Plan being revised more frequently than the current three-year schedule.

4. Next Steps

Following the feedback received we have made some amendments to the HND Implementation plan and environmental assessments. We will now submit the HRA Derogations report to the Department for Energy Security and Net Zero (DESNZ) in their role as 'Appropriate Authority' within the context of the Conservation of Habitats and Species Regulations 2017 (as amended), and other associated regulations.

Following DESNZ approval, any necessary amendments will be made to the HND Implementation Plan and/ or environmental assessments ahead of the final HND Implementation Plan being published alongside all final environmental assessments and the SEA Statement which summarises how the environment has been considered in the development of the Plan.

As with all strategic plans, the HND Implementation Plan will then undergo a formal revision cycle to look at updates which have happened since the August 2024 baseline freeze. This review schedule process, which is anticipated to commence in 2027, has been outlined in the HND Implementation Plan.

5. Technical Annex

Migratory Fish Methodology

The feedback highlights that a consistent methodology hasn't been used for screening migratory fish features in or out. It suggests that whilst feedback provided was minor it should be considered if the assessment is going to be used in future project level assessments.

Our response

MCZa Appendix A has been amended to reflect this. It should be noted that these SACs are all over 100 km from the study corridor (and thus beyond the distance used in the AA for identifying significant barrier effects) and the majority are on (or drain to) the south coast of Wales. Moreover, the likely migration routes in Figure 7 show that fish travelling to these SACs are likely to come from the south-west (i.e. the Celtic Sea into the Bristol Channel) rather than from the north through the Irish Sea, which would mean there is limited opportunity for interaction between fish from these SACs and identified study corridors.

Fish Datasets

Table 10 page 73-80 protected and priority fish and shellfish species.

The feedback acknowledges the use of fisheries sensitivity maps by Coull et al. (1998) and Ellis et al. (2012), but advises noting their limitations, particularly due to the lack of survey data for inshore coastal waters under 30m depth, estuaries, and the age of some data. NRW recommends consulting additional data sources for the Celtic Sea, like the PELTIC surveys by Cefas. The report "Spawning and nursery grounds of forage fish in Welsh and surroundings waters" by Campanella & van der Kooij (2021) is highlighted as a valuable updated summary of data sources for significant areas for various fish species in Welsh waters.

Our response

This feedback has been noted. These datasets were considered to provide the best comparative coverage across the full study area, however, further studies and data should be considered, as relevant for the area, at the project level. The suggested data sources have been referenced in the mitigation section of the SEA ER for consideration at the project level, where relevant for the area.

Fisheries

Feedback from stakeholders suggested that the SEA, HRA and MCZ assessments do not fully recognise the risks posed to fishing grounds, critical spawning and nursery habitats, or the long-term sustainability of commercial fisheries across UK waters.

Our response

Spawning and nursery grounds were considered and assessed as a sensitivity indicator for commercial fisheries (Material Assets) as well as biodiversity, flora and fauna in the SEA ER, however the data suitable for use at this strategic level classifies large areas as sensitive grounds, and project-level data should provide greater accuracy. The relative intensity of fishing activity was also considered and scored as a sensitivity indicator for commercial fisheries (Material Assets). The spatial assessment has been expanded in Section 9.2.1 Cumulative/in-combination effects in the SEA ER, and recommendations for coordination brought through to the mitigation in Section 10.1.

Otter Screening Distances

The feedback indicates that a 2 km distance is insufficient, while the 20 km distance used in the screening is closer to standard practice. It suggests determining the exact distances at the sites through survey or mitigation to minimise impacts. The “Ecology of the European Otter” document published by Natural England is recommended as an appropriate reference.

Our response

The justification for the 2 km distance at AA stage is provided on page 475 of the HRA where it states, 'In coastal environments otters do tend to have much smaller home ranges and travel shorter distances (2 km according to Vincent Wildlife Trust).

EMF Impacts from Subsea Power Cables

The feedback highlights the assessment of electromagnetic fields (EMF) emitted by subsea cables, noting they affect species within tens of metres, but the significance is downplayed. Species affected include herring, electroreceptive species like skates, migratory species such as salmonids and eels, and juvenile demersal fish. The assessments fail to consider cumulative EMF exposure from multiple cables, behavioural changes, impacts on feeding patterns, catchability, stock distribution, and fishing operations. It warns that EMF effects could materially alter stock availability and fleet behaviour, especially in areas heavily fished by SFF members, and this has not been meaningfully assessed.

Our response

EMF effects are considered to be appropriately considered across all of the HND Implementation Plan environmental assessments. Within the HRA and MCZ assessments, EMF impacts are considered including sensitive receptors (e.g. elasmobranchs, migratory fish and benthic species), potential behavioural responses, and the influence of cable configuration. The assessment reflects the current evidence base, which indicates effects are highly localised and limited to small, short-term behavioural changes, with no evidence of population-level impacts. Cumulative and site-specific considerations will be addressed at the project level where sufficient design detail is available.

With regards to the SEA, reference to elasmobranch sensitive species has been included within the high level impact effects in Table 28 of the SEA ER. Regarding offshore cabling the table notes that there is potential for adverse effects on fish stocks. The spatial assessment has been expanded in Section 9.2.1 Cumulative/in-combination effects in the SEA ER, and recommendations for coordination brought through to the mitigation in Section 10.1.

Consideration of Alternatives

Stakeholders requested clarification on the “Consideration of Alternatives” mentioned in Section 9 of the SEA Environmental Report. There is confusion regarding whether these alternatives align with the reasonable alternatives presented in the SEA ER. Or if they pertain to those considered in other environmental assessments.

Our response

Section 9 of the SEA ER considers potential strategic level alternatives as part of the SEA process and makes reference to the route and option appraisal process that considered many alternative routes and options, and which was subject to a light SEA assessment. This section does not consider alternatives that were considered and appraised within the HRA and MCZ assessments – these are discussed within the recommended design appraisals in Section 9.1 of the SEA ER.

The feedback seeks further clarity on the outcomes of the cumulative assessment involving other plans and programmes considered, there is difficulty in locating detailed information on the cumulative effects assessed within them.

Our response

Spatial consideration of other projects has been further considered and expanded in Section 9.2.1 Cumulative / In-combination effects of cabling and onshore infrastructure with other HND cables and existing and planned infrastructure in the SEA ER. For strategic-level plans, additional text

has been added to expand on the potential interaction and in-combination effects, whilst also recognising that there is insufficient detail to fully assess the cumulative and in-combination effects at this strategic level, as there are no confirmed designs or methodologies for each of the cable routes. Relevant plans should be considered and assessed further for the potential for cumulative and in-combination effects at the project level.

Clarification on the consideration of alternatives within an HRA/MCZa content was requested by some stakeholders.

Our response

With regards to HRA and MCZa point of view, it is not legally necessary to consider alternatives unless there is reason to believe that the study corridor cannot be delivered without adverse effects on the integrity of European sites, or, in the case of MCZas, without giving rise to a significant risk of hindering the achievement of conservation objectives for designated features. The study corridors have been defined as 5 km wide (and thus much wider than the actual cable routes) to enable the developers to avoid impacts where this is feasible. There is a limit to the extent to which the HND Implementation Plan can avoid European sites and MCZas as the export corridors must connect windfarms to shore and some of these windfarms (beyond the control of NESO) are within European sites or MCZas.