

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House (2 The Square)
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BS1 6PN

Our ref: AE/2025/130509/03-L01
Your ref: EN010109

Date: 15 July 2025

Dear Sir/Madam

APPLICATION BY NORTH FALLS OFFSHORE WIND FARM LTD FOR NORTH FALLS OFFSHORE WIND FARM

THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION (EXQ3)

Thank you for consulting with the Environment Agency. We note that the questions in ExQ3 reflect the issues raised in our Relevant Representations.

We also note the schedule of changes to the draft DCO to include us as a named consultee on requirements 8,12,15,22 and 23 and we wish to raise our support for this.

Please find below our answers to the questions raised which are referenced by the numbers provided.

Q11.0.1

Reviewed documents:

- Chapter 9.66- Groundwater Risk Assessment and Monitoring Plan - Private Water Supplies and Licenced Abstractions Parts 1 to 4
- Chapter 7.15- Outline Horizontal Directional Drilling Method Statement and Contingency Plan

Outline Horizontal Directional Drilling Method Statement and Contingency Plan

Page 10 and 11- Reference to Figure 1.1- this does not appear to be included in the document.

Risk and Control Measures

Will private water supplies be considered under the same umbrella as sensitive sites with respect to potential drilling mud breakout during the onshore HDD?

Groundwater Risk Assessment and Monitoring Plan - Private Water Supplies and Licenced Abstractions

2.14 Radius of Influence

Considering the uncertainties in the empirical Sichardt formula we agree with conservative use of 250m to screen potentially impacted groundwater receptors.

4 Preliminary Groundwater Risk Assessment

Abstractions scoped-in (cf. Tables 11, 12 and 13)

Agree with the general approach and level of detail and monitoring. This area is known for a large number of shallow wells which supply properties for potable water supply which may also be protected rights or lawful users.

5 Hydrogeological Impact Assessment

The assessments of these supplies relies heavily on the SLR Private Water Supply Monitoring Report (February 2025). Has this been made available? Has there been any additional groundwater levels monitoring or have the main inferences of groundwater levels across the DCO buffer zone been made from the Hungerdowns Farm monitoring borehole? For the applicant's information- other nearby monitoring points in the relevant aquifer in the Kesgrave Catchment Subgroup may be available on the Hydrology Data Explorer: [Hydrology Data Explorer](#).

The assessment is also based on a conservative Radius of Influence. The levels measurements taken in private water supplies were also performed in July/August 2024 which is typically a seasonal low in levels. However, due to the extremely wet Winter of 2023-24 groundwater levels in the high-storage Kesgrave Catchment Subgroup aquifer remained Above Normal (Cunnane Rankings) at Hungerdowns Farm (TM02_791), Glebe Cottages (TM03_900) and Lawford House Farm (TM03_900) in December 2024 and Exceptionally High during July and August 2024 so are not representative of low levels that may follow a poor recharge season and/or dry summer. This means the summer-period headroom in the private water supplies may not usually be as high as has been measured.

5.2.1 to 5.2.4. Private Water Supplies

We are satisfied with the assessment of these water supplies. The use of trenchless crossing is effective mitigation to avoid potential issues caused by dewatering at these locations.

6 Risk Assessment

6.1 Potential Effects (100.)

During construction of trenched cable emplacement and substation the potential for dewatering operations causing drawdown in the shallow groundwater of the Kesgrave Catchment Subgroup and/or Cover Sands may also impact groundwater

receptors. As the depths of the foundations and whether or not sheet piling will be used as part of construction and operation is also unknown at this time, the potential dewatering and its impacts cannot be assessed.

We note potential dewatering will likely have no effect post-construction phase, although subsurface structures are still likely to impact groundwater flows during the operational phase.

6.3 Impact on Groundwater Flows

(112.) The statement here that levels collected in July/August 2024 are similar to levels following dry summer periods is not correct. Groundwater levels, specifically at Hungerdowns Farm were exceptionally high from March to October 2024, with record highs for respective months occurring from March to June of that year. I would strongly suggest a more complete review of data from this monitoring point (available on the Hydrology Data Explorer) to attempt to extrapolate a more conservative assessment. It is unfortunate that the applicant was only able to collect data from private water supplied in 2024 to submit at this time. At time of writing (July 2025) we are currently in a period of dry weather so I would suggest some comparative data could be collected this summer as levels are still in a recession from last year.

(116.) As monitoring is also required at these sites, we suggest those sites visited last year and considered at-risk of dewatering during the construction phase to also be revisited.

6.4 Impact on Groundwater Quality

(119) We agree baseline level monitoring should be undertaken. RH07, RH17, RH18, RH30b, RH10, RH11a, RH14, RH24 and RH25 have all been identified as being at risk from adverse water quality impacts. Appropriate water quality monitoring should be carried out at these locations.

(123) We agree monitoring for pH, Chromium including Chromium VI should be undertaken at PWS within 100m of any CBS placed during construction. Appendix D Outline Groundwater Monitoring and Mitigation refers to Schedule 1 and 11 of the Private Water Supply Regulations (England) 2016, Schedule I and II. The Schedules should be included in the Appendix.

(125) The chemical composition of the drilling fluids should be provided and be suitable for drilling in proximity to PWS.

6.4.4 We look forward to reviewing the Piling Risk Assessment when made available. Please note we have just published new guidance on piling risk on the CL:AIRE website: [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#)

(131) Private water supplies are not within the 250 m radius supplied. However, as the depth of the substation excavation is currently unknown, radial impacts are also unknown. A new radius of impact should be reviewed at the piling risk assessment, when the required excavation depths and dewatering requirements are known.

Additional Information.

The dewatering works may require an abstraction licence if more than 20m³/day is abstracted. Please refer to Regulation 5 of The Water Abstraction and Impounding (Exemptions) Regulations 2017 to assess whether the works may be exempt from abstraction licensing. Please note that the regulations apply to a single operation, not different dewatering locations within the same operation.

Q11.0.2

The Bentonite Breakout Plan appears thorough, incorporating both emergency contact details and a well-structured decision tree for managing potential leakage incidents. Additionally, the inclusion of mitigation measures to help prevent leaks is welcomed.

Q11.0.3

We can confirm that SoCG Item 4 [REP5-076] is now agreed.

We trust this advice is useful.

Yours faithfully,



Planning Officer

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