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Environment Agency

The Planning Inspectorate

DoggerBankSouth@planninginspectorate.gov.uk

Our ref: 20050175
Your ref: EN010125

Date: 25 April 2025

Dear Sir/Madam

Dogger Bank South Offshore Wind Farms Project: Environment Agency response to Issue Specific Hearing 4 Action Points and Rule 17 letter

Please find below our responses in relation to action points arising from Issue Specific Hearing (ISH) 4 (9 April 2025) and the subsequent Rule 17 letter (15 April) for the Dogger Bank South Offshore Wind Farms project.

Action Points from ISH4

2) To confirm whether the 2013 River Hull and Holderness Drain Flood Mapping Study has been combined into, or superseded by, NaFRA2, particularly in the areas around Flood Zones (FZ) 2 and 3 - *Deadline 4*

Our new Risk of Flood from Rivers and Sea and Flood Map for Planning (Flood Zones 2 and 3) dataset have been created as part of the new national flood risk assessment (NaFRA2), which brings together local detailed model outputs with new national modelling (NNM) and asset breach scenarios. In the case of the site in question the **2013 River Hull and Holderness Drain Flood Mapping Study** has been used as the primary data source for the new national assessment of flood risk (NaFRA2) within this locality.
The new NaFRA2 data, as explained above, is derived from multiple sources of information, with outputs being used to inform both the Risk of Flood from Rivers and Sea (**RoFRS**) and Flood Map for Planning (**FMfP** - Flood Zones 2 and 3) products.

The FMfP (Flood Zones 2 and 3) and supporting datasets are designed to only give an indication of flood risk to an area of land and are not suitable for showing whether an individual property/area is at risk of flooding (in an undefended scenario). They are also produced to support the implementation of Government planning policy by planning authorities. The Flood Zones are one of the flood risk datasets used to set out when Flood Risk Assessments (FRAs) and further detailed site-specific investigations are required and are used by local planning authorities to know when to consult the Environment Agency on planning applications in line with Schedule 4 of the Town and Country Planning (Development Management Procedure) Order 2015.

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RoFRS is a probabilistic product that represent the presence and condition of flood risk management assets and takes account of the chance of them overtopping or failing and shows the overall flood risk from rivers and the sea. Though this is the case, these outputs do not provide the design flood depths needed for detailed planning considerations required in an FRA. As such, detailed local modelling, like the **2013 River Hull and Holderness Drain Flood Mapping Study,** must be used (if available) to inform any detailed Flood Risk Assessment's required.

We have noted that NaFRA2 shows there is an increased risk around surface water in the future, in proximity of the substation. We request that the applicant considers this information alongside their plans, to understand if there is an interaction. If so, we request they consider whether any further mitigation to the building or site is required, using the ERYC SFRA.

3) To provide an opinion on the matter below which the Examining Authority (ExA) raised and your position on a potential increase to flood risk elsewhere? The applicants identify that the temporary construction compounds would occupy an area of 5,625m2. The EA identify two of these would be wholly within FZ3. In the response to ExQ1 reference HF 1.3, the applicants explain the associated displacement of floodwater would be small relative to the wider flood extent - *Deadline 4*

We have spoken with the applicant to get an understanding of what they propose to put on these compounds and how long they are likely to be in place for.

We understand that equipment may be on site for somewhere between 4 and 6 years. We understand that there may be welfare units/offices on site, generators and soil storage.

We acknowledge that the soil will be stored in such a way to not alter flow paths.
The Two Satellite Construction compounds the applicant has identified in Flood Zone 3 are:
Section 7 – TCC-A mainly in FZ 3 the area around this compound is very rural around, so we have less concern about the impacts from temporary displacement, however, request the applicant considers any impacts it may have with the flood data available.
Section 8-TCC-B border FZ3 the areas around this compound are more urban, and there are some FZ1 properties nearby. We have asked the applicant to look at data available including flood zones, modelled levels and ground levels, to give some confidence that the proposal will not increase flood risk to properties in the locality.
In addition, we have discussed what they will have in place to limit the impact of flooding to any offices/welfare units on site – such as setting finished floor levels appropriately, providing flood proofing etc in line with the SFRA. We have also asked for some assurance on the proposed access/egress routes.
The applicant currently has a data clarification enquiry in with the Environment Agency. We have now looked at this and replied to the applicant. The miss-match between the flood map and the gridded outputs/level data at the two locations they queried is due to only 1d modelled outputs (modelled flood outlines) being produced

for the area north of the A1035. This means that even though this model was used to inform the flood zones in the Flood Map for Planning (using the 1D flood outlines), there is no gridded data (2d) outputs available north of the A1035.
Our Flood Map for Planning only uses the 1D modelled flood outlines to contribute towards the flood zones, as such 2D data outputs are often limited to urban/critical areas to manage costs.

8) To confirm its position on the proposed watercourse crossings Wx-029 and Wx-030 and the associated environmental impacts [REP2-014] - ***Deadline 4***

WX-029 will be clear span. The only additional requirement we have here is that the abutments for the crossing are located away from the embankment such that the clear span encompasses the bank on both sides of the watercourse.
WX-030 – this will be culverted. In principle we do not object to the culvert crossing, though the culvert must be appropriately sized to pass a flood flow.
We have let the applicant know that the Meaux and Routh East Drain channel is deep and steep sided so it may be difficult to reinstate the channel when the culvert is removed.
In relation to all watercourse crossings whether clear span or culverted we would expect that the sites are reinstated to the existing conditions once the temporary crossings are removed.
Therefore, we have asked the applicant whether reinstatement and monitoring after the crossings have been removed could be included either in the proposals, or within the requirements of the DCO. We will be meeting with the applicants and our legal team to understand whether this is best secured through the requirements or through the protected provisions.

11) To comment/ provide an opinion on the assessment of temporary watercourse access crossings and trenched cable crossings method in Environmental Statement (ES) Chapter 20 [REP1-014] and additional information submitted by the applicants in relation to action point 10 (EA & LLFA TO ANSWER) - *Deadline 5*

We will provide a response to this by Deadline 5.

14) Respond to outstanding questions in ExQ1 related to hydrology and flood risk matters. (EA & LLFA TO ANSWER) - *Deadline 4*

CA.1.17 - In principle we are happy with the proposal set out in the Outline Code of Construction Practice Table 3.2, however when we met the applicant, we suggested re-wording Requirement 19 of the draft DCO to specifically mention watercourse crossings and crossing methodologies. However, we will be meeting with the applicants and our legal team to understand whether this is best secured through a re-worded requirement or through the protected provisions.

HF1.2 – In addition to our previous answer we can confirm that the 2013 River Hull and Holderness Drain Flood Mapping Study was used as the primary data source for the new national assessment of flood risk (NaFRA2) within this locality, reflecting that

it is the best local model we have for the River Hull, however due to its age, we would always advise caution when considering its outputs as factors may have changed over that time, for example climate change. Unfortunately, it is going to be several years before a new EA local model is available for the River Hull. The 2013 River Hull and Holderness Drain Flood Mapping Study Model did include climate change at the time, but to understand current/future risk the climate change assumptions at the time should be reviewed against the most up to date information.

When we spoke to the applicant about future flood risk, we suggested adding an additional requirement. This is because no detailed modelling has been undertaken, and our flood risk response has been based on a 32-year lifetime. Our recommended requirement would be that the facility must be decommissioned and offsite after 2061. If it is to remain in place after this date, then modelling must be started prior to 2061 to understand the most current climate change predictions and how this may impact future flood risk and the implications it may have on the facility as well as what mitigation may be required. The applicants have assured us this has already been captured elsewhere, and we will review this.

HF1.7 – Cumulative impacts regarding flooding should be taken account of in the Flood Risk Assessment.
The Environment Agency (EA) do not currently have any significant EA capital schemes along the proposed route that may align with the construction period of this proposal. However, we will still be undertaking regular inspection and maintenance of our assets throughout the construction phase and beyond. Please also note, that if there are any failures of assets then we would have to carry out unplanned/emergency works.

15) ExQ1 [PDA-014] - question MCP1.4 was directed to the EA; however, no response was submitted to this question as part of the EA's response in [REP3-042]. The question related to cable protection in the nearshore. In the statement of common ground between the applicants and EA [REP1-029] it is suggested that the cable protection measures in the nearshore environment are not currently agreed and no further information was submitted as part of the relevant representation or any written representations afterwards. Provide further details on the issues raised and works required to resolve this. In addition, provide your views on the updated coastal erosion technical note (revision 2) [REP3-023]? - *Deadline 4*

We can confirm that we are now satisfied with the information provided and with the mitigation proposed by the Applicants. We are happy that the position of this item be amended to agreed within the Statement of Common Ground.

Response to Rule 17 letter

HF.1.12 oCoCP content and quality
Can you comment on the details provided in the oCoCP (revision 3) [REP1-025] related to flood management, the drainage strategy, surface water management plan and watercourse crossings

including:
• If the level of detail is sufficient to frame the necessary mitigation of the potential effects during construction and operation of the projects.
We have reviewed the Outline Code of Construction Practice with flood risk in mind, below are some further detailed comments on specific sections:

Emergency Response Evacuation and Pollution Control Plan
We have asked the applicant for further assurance that and emergency evacuation route/plan will be achievable, in particular for temporary compounds Section 7 – TCC-A and Section 8-TCC-B.

Outline Drainage Strategy and Surface Water Management Plan
In principle we are happy with the proposal, however request that if any surface water is to discharge to main river then we are consulted.

Flood Management
We would like to reiterate our response to the Issue Specific Hearing 4 – Question 3, as we feel it is relevant here:
We have spoken with the applicant to get an understanding of what they propose to put in their temporary compounds and how long they are likely to be in place for.
We understand that equipment may be on site for somewhere between 4 and 6 years.
We understand that there may be welfare units/offices on site, generators and soil storage.

We acknowledge that the soil will be stored in such a way to not alter flow paths.
The Two Satellite Construction compounds the applicant has identified in Flood Zone 3 are:
Section 7 – TCC-A mainly in FZ 3 the area around this compound is very rural around, so we have less concern about the impacts from temporary displacement, however, request the applicant considers any impacts it may have with the flood data available.
Section 8-TCC-B border FZ3 the areas around this compound are more urban, and there are some FZ1 properties nearby. We have asked the applicant to look at data available including flood zones, modelled levels and ground levels, to give some confidence that the proposal will not increase flood risk to properties in the locality.
In addition, we have discussed what they will have in place to limit the impact of flooding to any offices/welfare units on site – such as setting finished floor levels appropriately, providing flood proofing etc in line with the SFRA. We have also asked for some assurance on the proposed access/egress routes.

Watercourse Crossings – Main Rivers and Ordinary Watercourses and Crossing Method Statements

In principle we are happy with the proposal set out in the Outline Code of Construction Practice, however when we met the applicant we suggested re-wording Requirement 19 of the draft DCO to specifically mention watercourse crossings and crossing methodologies. However, we will be meeting with the applicants and our legal team to understand whether this is best secured through a re-worded requirement or through the protected provisions.

We require this to be clear to enable us to secure discussions ahead of any works taking place, to ensure our satisfaction with the proposals.

WX-030 – this will be culverted. In principle we do not object to the culvert crossing, though the culvert must be appropriately sized to pass a flood flow.

We have let the applicant know that the Meaux and Routh East Drain channel is deep and steep sided so it may be difficult to reinstate the channel when the culvert is removed.

In relation to all watercourse crossings whether clear span or culverted we would expect that the sites are reinstated to the existing conditions once the temporary crossings are removed.

Therefore, we have asked the applicant whether reinstatement and monitoring after the crossings have been removed could be included either in the proposals, or within the requirements of the DCO. We will be meeting with the applicants and our legal team to understand whether this is best secured through the requirements or through the protected provisions.

Where temporary dams are required, we expect the applicant to assess the impact this may have on flood risk during the works.

We are still discussing proposed protective provisions with the applicant, so are unable to comment further on this at this time.

Flood Defence Monitoring

We are pleased to see this has been incorporated, however we would also like this to be extended to where temporary crossings are removed, such as the culvert crossing at WX-030.

Piling Risk Assessment

We expect that any piling near flood defences would be picked up when detailed method statements are drawn up, we would like to ensure that we are part of those discussions. We request clarification that this will be secured by a requirement – we shall discuss with our legal team and the applicants.

• *If there is reasonable certainty of the quality and content of the future detailed CoCP, whether the approval bodies identified in Tables 3-2 and 3-3 of the oCoCP (revision 3) [REP1-025] would be appropriate.*

Satisfied with table 3.2 from a flood risk perspective, the only comment we have to make is that if surface water is directed to an Environment Agency Main River, then we would also like to be consulted on the Surface Water Management Plan.

• *If the measures listed for temporary culverts in section 6.3.2.6 of the oCoCP (revision*

3) [REP1-025] would be appropriate for permanent culverts, as suggested in paragraph 205 of the same document.

As none of these effect main rivers we have no comment to make on this.

Please do not hesitate to contact me if you require any further information. We look forward to continuing to work with the applicant to resolve any outstanding matters and to ensure the best environmental outcome for this project.

Yours faithfully

[redacted]
Planning Specialist – Sustainable Places Yorkshire

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