

## Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an Order Granting Development Consent for the Outer Dowsing Offshore Wind project Project

### The Examining Authority's written questions and requests for information (ExQ1)

**Issued on 13 January 2025. Responses to be submitted at Deadline 4, on Monday 3 February 2025**

Please find below answers to the Examining Authority's written questions from the Environment Agency (EA) [ref no. 20049058].

Ref No.	Question	EA response
	<b>General and cross-topic questions</b>	
Q2 GC 1.2	<p><b>National Planning Policy Framework and Legislation</b></p> <p>The applicant and interested parties are requested to provide comments on any updates or changes to UK Government legislation, policy, or guidance relevant to the determination of this application that have been issued since the submission of the application.</p> <p><b>To the applicant and interested parties:</b> Please include a summary of the implications, if any, for this Examination.</p> <p><b>To the applicant and the Environment Agency (EA)</b></p> <p>Paragraphs 173 to 175 of the revised National Planning Policy Framework 2024 outline a sequential, risk-based approach for individual applications in areas currently or potentially at risk from any form of flooding. Provide a summary of implications, if any, for this Examination with respect to Climate Change, Flooding and Coastal Change.</p> <p>Note: Such updates should include, but need not be limited to, the National Planning Policy Framework published on 12 December 2024, the Clean Power 2030 Action Plan published on 13 December 2024, and other</p>	<p>Paragraphs 173 to 175 of the National Planning Policy Framework 2024 have been updated to clarify the approach that should be taken in applying the sequential test to individual planning applications. It is important to note that the general approach to steering new development to areas with the lowest risk of flooding from any source remains unchanged. However, paragraph 175 now promotes a more pragmatic approach to the sequential test when only part of a development site is affected by flood risk and clarifies that where evidence (a site-specific flood risk assessment) confirms there will be no built development or escape routes etc. within an area at risk, then the sequential test does not need to be applied.</p> <p>In the context of this application, the Applicant has presented evidence to suggest that high risk areas cannot be avoided, and we are working with them to secure appropriate mitigation measures to manage the risk.</p> <p>EN-1 Overarching National Policy Statement for Energy advises at paragraph 5.8.36 that the Secretary of State should be satisfied that the Sequential Test has been applied and satisfied as part of site selection and we can provide further advice in relation to the risk to alternative sites if this is required.</p>

Ref No.	Question	EA response
	recently published Ministerial statements and policy papers.	
	<b>Land Use, Geology and Ground Conditions</b>	
Q2 LU 1.12	<p><b>Climate change, increased rainfall and soil impacts</b></p> <p>At Issue Specific Hearing 3 [<a href="#">REP3-051</a>], the ExA sought clarification from the applicant regarding the possible effects of increased peak rain fall intensity due to climate change on earth movement and subsidence. In response the applicant has provided a clarification note regarding Climate Change, Increased Rainfall &amp; Soil Impacts [<a href="#">REP3-055</a>]. Please provide comments on the assumptions and conclusions made in the clarification note.</p>	<p>These matters fall under the remit of Lincolnshire County Council as the lead local flood authority (LLFA) and we defer to its views on this matter.</p>
	<b>Water Environment</b>	
Q2 WE 1.1	<p><b>National assessment of flood and coastal erosion risk</b></p> <p>On 17 December 2024 the Environment Agency published its research and analysis of Flood Risk and Coastal Erosion in England titled 'National assessment of flood and coastal erosion risk in England 2024'. The ExA notes that there may also be further updates regarding Climate Change Scenarios, Long-Term Flood Risk checks, etc.</p> <p><b>To the EA:</b></p> <p>Please provide a timeline for when these changes will come into effect and any implications for this examination due to these changes.</p>	<p>On 28 January 2025, the Environment Agency published the Risk of Flooding from Rivers and Sea (RoFRS) and Risk of Flooding from Surface Water (RoFSW) products.</p> <p>The RoFRS shows the chance of flooding from rivers and the sea to areas of land, considering the presence and condition of flood defences. The RoFSW shows the chance of flooding from surface water to areas of land. As well as present day risk of flooding from rivers and sea and from surface water, climate change scenarios have been produced to indicate the predicted impacts of climate change on future risk.</p> <p>The Flood Risk Assessments, which form part of the Environmental Statement for this DCO application, use existing local fluvial and tidal flood risk data to assess the risk of flooding to and from the proposed development over its expected lifetime. Additional site-specific detailed modelling for the substation and the noise bund at the landfall location have been / are being carried out, including appropriate allowances for the impact of climate change.</p> <p>We consider that the above-mentioned updates should not materially affect the assessments already undertaken (and in progress) in the Environmental Statement and Flood Risk Assessments.</p> <p>We defer to the LLFA in respect of surface water flood risk.</p>

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		<p>On 25 March 2025, we will be updating our Flood Map for Planning, which will show updated Flood Zones using the new National Flood Risk Assessment (NaFRA) data. We are unable to comment on what this might show as it is subject to change until the time it is published. However, the existing local fluvial and tidal flood risk data already used for the assessment of this application provides more detail in respect of residual risk, which means that there should be no implications for the current examination.</p>