

The Examining Authority
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2024/135560/07-L02
Your ref: EN010130
Date: 21 February 2025

Dear Members of the Examining Authority

Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an order granting development consent for the Outer Dowsing Offshore Wind Project (Generating station and transmission infrastructure)

Pursuant to Deadline 4a, the Environment Agency notes that the Examining Authority invites comments on any other submissions received at Deadline 4. Accordingly, we provide comments on the following submissions, together with updates relating to other matters within the Environment Agency's remit.

**1.0 [\[REP4-006\]](#) Draft Development Consent Order
*Requirement 31 (Soil Management Plan)***

1.1 We welcome our inclusion as a specific consultee to the discharge of Requirement 31, which will enable us to advise on stockpiling methods/locations/handling in the flood zones/hazard areas (as requested in our Deadline 3 representation [\[REP3-064\]](#)).

1.2 The onshore Export Cable Corridor and 400kV Cables flood risk assessment ('the FRA') [\[REP4-024\]](#), paragraph 162] confirms that the details (regarding stockpiling and phasing) will be finalised post-consent and will be minimised or avoided, where possible, within all hazard areas. The Outline Soil Management Plan, paragraph 79 [\[REP4-069\]](#), confirms that soil stockpiling within the floodplain will be minimised or avoided, where possible, within all hazard areas. Paragraph 80 also confirms that all stockpiling will be located on the landward side of any flood defences. These amendments address our outstanding points on stockpiling within the floodplain [\[REP1-048\]](#), paragraphs 7.5 to 7.6].

2.0 [REP4-022](#) (Part 1 of 2) and [REP4-024](#) (Part 2 of 2)] Appendix 24.2 Flood Risk Assessment: Onshore ECC & 400kV Cables (Document Reference: 6.3.24.2, Rev: V4.0, Date: 3 February 2025)

2.1 Sections 24.1.5 and 24.5: In our Relevant Representation [\[RR-018\]](#), we advised that the FRA must demonstrate that the climate change allowances and

scenarios used in the Environment Agency modelling are appropriate for assessment of this project. The Applicant's response to our Relevant Representation confirmed that *'the climate change scenario considered (2115) is in excess of the lifetime of development (2065) and is therefore considered a conservative assessment of risk'*. We requested [[REP1-048](#), paragraph 7.7] that this be recorded in the FRA to demonstrate that the climate change allowances are appropriate and that flood risk has been assessed and considered for the lifetime of the development. This has not been done. However, we consider that the absence of this information does not change the assessment and overall conclusions made on flood risk.

2.2 Noise Bund (Hydraulic Modelling and Impact)

We have reviewed the noise bund modelling undertaken (submitted in 4 parts: [REP4-095](#) (Part 1 of 4), [REP4-096](#) (Part 2 of 4), [REP4-097](#) (Part 3 of 4) and [REP4-098](#) (Part 4 of 4)) and we can confirm that it is 'fit for purpose'. The FRA uses the findings of the noise bund hydraulic modelling to demonstrate the impacts of the proposed temporary noise bund on the surrounding area.

2.3 The hydraulic modelling considers the design flood¹ and to check the sensitivity to more extreme events, the hydraulic modelling also considered the 0.1% event (1 in 1000 chance each year) plus an allowance for climate change. In its conclusions, the FRA considers the impact of the temporary bund for the extreme event rather than the design event.

2.4 The FRA does not set out the impact of the temporary noise bund for the 0.5% ('design') event (1 in 200 chance each year) with an allowance for climate change. To assist the Examining Authority in considering the design event, we have annotated the locations where there is a change in wet and dry conditions onto Figure No. 54 [[REP4-098](#)] (the flood depth difference for the 0.5% AEP plus CC Breach 2 Proposed Scenario) and we attach this as Appendix A below. This highlights –

- Area 1 (purple outline): The modelling shows a reduction compared to the baseline flood depths.
- Area 2 (orange outline): The modelling shows areas that were previously wet and are now dry.
- Area 3 (blue outline): The modelling shows an increase of between 0.01 to 0.03m (10mm to 30mm). However, this is confined to an area of open water/pond which is likely to impact upon the modelling.
- Area 4 (black outline): The modelling shows a decrease and increase in flood depths due to the temporary noise bund.

2.5 The impact of the temporary bund for the 0.1% event (1 in 1000 chance each year) with an allowance for climate change is set out within the FRA and shown in Figure No. 62 of 15.7 Noise Bund Hydraulic Modelling Report Appendix C Figures (Part 4 of 4) [[REP4-098](#)].

2.6 The FRA shows that any increase in flood depths are to the areas east and north of the noise bund location and concludes that *'there are no sensitive receptors in the areas of increased flood depths, with the majority of the areas being*

¹ The 'design flood' is a flood event of a given annual flood probability, which is generally taken as tidal flooding with a 0.5% annual probability (1 in 200 chance each year) plus an appropriate allowance for climate change (Reference ID: 7-002-20220825 Planning Practice Guidance, flood risk and coastal change).

agricultural fields' (paragraph 122). The modelling report also confirms that *'these increases are away from potential receptors and are not deemed to pose an increase in flood risk to receptors'*.

- 2.7 The hydraulic modelling shows that the scale of this increase could be deemed relatively small when considered against the significant flood depths that these areas may experience in the absence of the project (as shown in the baseline hydraulic modelling outputs) and the FRA concludes that no *'additional mitigation measures, other than those outlined in Section 24.7.1, are necessary in regard to the noise bund and flood risk'*. It is also noted that these increases will be temporary, during the construction phase of the development only.
- 2.8 The Planning Practice Guidance, paragraph 049 (Reference ID: 7-049-20220825) advocates that FRAs consider the extent and nature of any increase in risk and assess its significance. This is also a consideration for the Examining Authority and the Secretary of State when balancing the acceptability of this impact against the benefits of the project, as required by paragraph 5.8.42 of the Overarching National Policy Statement for Energy (EN-1).
- 2.9 To assist with your deliberations on this matter, we have highlighted the increases of up to 30mm for the 0.5% ('design') event (1 in 200 chance each year) with climate change and up to 60mm (as referenced in paragraph 123 of the FRA) for the 0.1% event (1 in 1000 chance each year) with climate change and the areas affected (resulting from the presence of the proposed temporary noise bund). However, as stated in the FRA, these increases do not appear to impact on any sensitive receptors.
- 2.10 HDD Pit Bunding
We are pleased to note that the FRA (Section 24.4.2, paragraph 65) confirms that the landfall Horizontal Directional Drilling Pit Bunding will provide protection to the 0.5% AEP (annual exceedance probability) 97.5% confidence extreme sea level, as requested by the Environment Agency. We had, in our Deadline 4 representation [REP4-127], requested that this be expanded in the outline Code of Construction Practice document, however, we are satisfied that this is now included in the FRA to demonstrate agreement between the parties on this point.
- 2.11 I can now confirm that all the issues raised by the Environment Agency in respect of this FRA are now resolved. We are of the view that the FRA provides an assessment that is appropriate to the scale, nature and location of the development and is sufficient to inform the Secretary of State's consideration of the flood risk Exception Test, as required by paragraph 5.8.11 of EN-1. Accordingly, the Environment Agency **withdraws its holding objection**, outlined in paragraph 13.3.1 of its Relevant Representation [RR-018].
- 3.0 **[REP4-027] ONSS part 1 of 2 & [REP4-028] ONSS part 2 of 2**
- 3.1 We received the modelling files in respect of the 75-year climate change scenario for the Onshore Substation (ONSS) on 14 February 2025. We are currently reviewing these and we will provide comments on the modelling, together with the updated ONSS flood risk assessment, when complete.

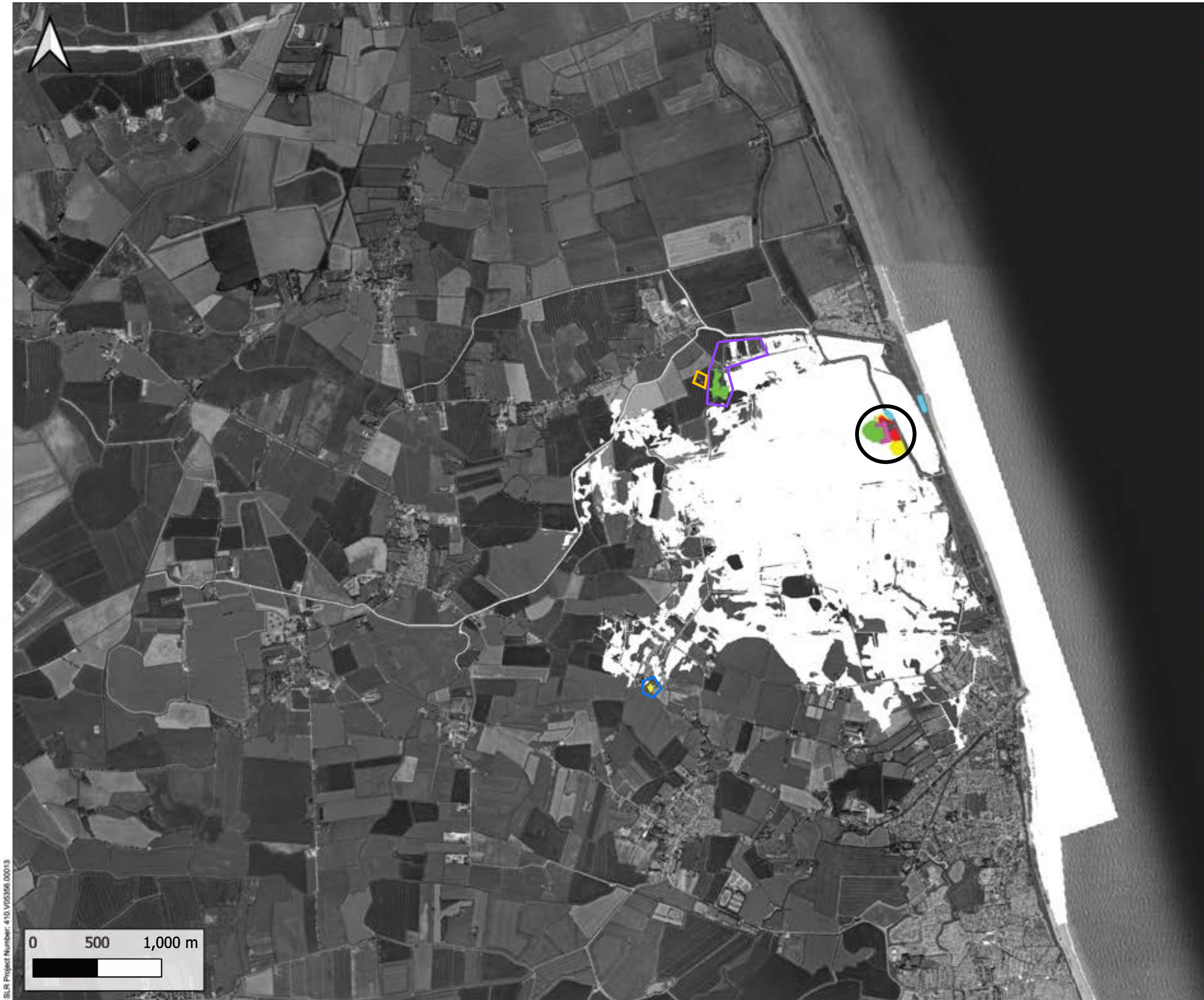
Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me at the number below.

Yours sincerely

Annette Hewitson
Principal Planning Adviser, MSc, MRTPI
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Appendix A

**Wet and dry conditions annotated onto Figure No. 54 [\[REP4-098\]](#)
(the flood depth difference for the 0.5% AEP plus CC Breach 2
Proposed Scenario)**



Legend

- Breach Location
- Proposed Noise Bund
- Difference in Depth (m)
 - ≤ -0.01
 - $-0.01 - 0.01$
 - $0.01 - 0.03$
 - $0.03 - 0.05$
 - $0.05 - 0.15$
- Change in Conditions
 - Was wet, now dry
 - Was dry, now wet

*Note: Due to the model cell resolution, the modelled extent of the noise bund is shown to be greater than in reality. This is a modelling assumption and is required to ensure that the flooding mechanisms are accurately represented within the hydraulic model.

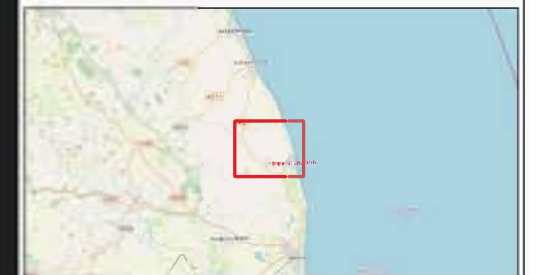


Figure No. 54

Project
Outer Dowsing Offshore Wind -
Noise Bund Breach Modelling
Client
Outer Dowsing Offshore Wind

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**Flood Depth Difference
0.5% AEP + CC Breach 2
Proposed Scenario**

Scale A3	Version 1.0	Date January 2025
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