

Outer Dowsing Offshore Wind

Statement of Common Ground with the Environment Agency

Deadline 6

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Abbreviations / Acronyms

Abbreviation / Acronym	Description
CoCP	Code of Construction Practice
DEFRA	Department for the Environment, Food and Rural Affairs
EA	Environment Agency
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EN-1	Overarching National Policy Statement for Energy
ES	Environmental Statement
FRA	Flood Risk Assessment
FRA3	Flood Risk Exempt Activity 3: Service crossing below the bed of a main river not involving an open cut technique
GW	gigawatt
MLWS	Mean Low Water Springs
NCERM2	National Coastal Erosion Mapping 2
NGESO	National Grid ESO
NGET	National Grid Electricity Transmission
ODOW	Outer Dowsing Offshore Wind
OnSS	Onshore substation
SOCG	Statement of Common Ground

Terminology

Term	Definition
Environmental Statement	The suite of documents that detail the processes and results of the EIA.
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), Total Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation (a wholly owned Green Investment Group portfolio company), TotalEnergies and GULF.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.

1 Introduction

1.1 Outer Dowsing Offshore Wind (ODOW)

1. Outer Dowsing Offshore Wind (“The Project”) is a proposed offshore windfarm, with an Array Area located approximately 33 miles (54km) off the coast of Lincolnshire. The Project has a total installed capacity of 1.5GW which is roughly equivalent to the annual electricity consumption of over 1.6 million UK households.
2. The Project includes the offshore and onshore infrastructure required to transmit the power generated by the wind turbines to an onshore substation (OnSS) at Surfleet Marsh and subsequently into the National Grid Transmission System at Weston Marsh, the grid connection point specified by National Grid Electricity System Operator (NGESO), in its grid connection offer for the Project.

1.2 The purpose of this Statement of Common Ground (SOCG)

3. The Environment Agency (EA) is a public body, sponsored by the Department for the Environment, Food and Rural Affairs (DEFRA), which has statutory duties and powers to protect and improve the environment, with statutory functions relating to main rivers, pollution, waste management, coastal defences and flood risk. There will be an interface between ODOW and the EA at locations where the Project intersects with main rivers, coastal defences, flood defences and in relation to the project’s management of flood risk, flood resilience and flood protection relating to the onshore substation (OnSS).
4. The EA is identified in the draft DCO as a consultee in the approval process for certain pre-construction documents in respect of certain construction activities, relating to its statutory duties.
5. An environmental permit would ordinarily be required from the EA pursuant to regulation 12(1)(a) (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016 in relation to the carrying out of a flood risk activity however regulation 12(1)(a) and the provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991 that require consent or approval for the carrying out of works have been disapplied in the Draft DCO (see Article 7) (document REP5-002 and the consent of the EA to the disapplication has been sought by the Applicant. Protective provisions have been included in the Draft DCO in Part 4 of Schedule 18 for the benefit of the EA in order to protect the assets over which the EA has responsibilities, replacing the normal environmental permit process for flood risk activities.
6. This draft SOCG has been prepared by the Applicant and the EA. It identifies topics that are relevant to the EA’s statutory role and its assets and states whether relevant matters are agreed, not agreed or still in discussion.
7. This SOCG has been prepared with due regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015).

1.3 Topics addressed in this Statement of Common Ground (SOCG)

8. Table 1 sets out the topics addressed in this SOCG which relate to the EA’s statutory roles. The topics referred to are referenced against the relevant chapter of the Environmental Statement (ES), or other DCO application plans or documents.

Table 1 Topics included in this SOCG

Topic	Application Documents and references
The protection of the EA's existing assets, resources, and flood protection responsibilities	<p>ES Project Description, Appendix 3.2 Onshore Crossing Schedule (document REP4a-067)</p> <p>Onshore Crossings Plan (document REP4A-005)</p> <p>Outline Code of Construction Practice (document REP5-113)</p> <p>Draft DCO (document REP5-002)</p> <p>Book of Reference (document REP4-013)</p> <p>Land Plans (document REP4-003-4)</p>
The Project's hydrology and hydrogeology, flood risk, ground water and water framework directive assessments and outline management plans	<p>ES Chapter 3, Project Description (document REP5-009)</p> <p>ES Chapter 23 Geology and Ground Conditions (document REP4A-015)</p> <p>ES Chapter 24, Hydrology, Hydrogeology and Flood Risk (document REP-4A-018)</p> <p>ES Chapter 24, Appendix 1 Groundwater Risk Assessment (REP4A-059)</p> <p>ES Chapter 24, Appendix 2 ECC FRA (REP4-022-025)</p> <p>ES Chapter 24, Appendix 3 OnSS FRA (REP4-027-028)</p> <p>ES Chapter 8, Appendix 1, WFD (APP-153)</p> <p>Outline Code of Construction Practice (REP5-113))</p> <p>Outline Operational Drainage Management Plan (APP-286)</p> <p>Outline Surface Water Drainage Strategy (APP-273)</p> <p>Outline Soil Management Plan (REP5-115)</p> <p>Outline Pollution Prevention and Emergency Incident Response Plan (APP-272)</p> <p>Outline Project Environmental Management Plan (REP4A-094)</p> <p>Outline Cable Specification and Installation Plan (REP5-117)</p> <p>Outline Site Waste Management Plan (APP-271)</p> <p>Noise Bund Hydraulic Modelling Report (REP4-094-098)</p>

1.4 Identification of items agreed / not agreed / in discussion.

9. This SOCG identifies the relevant topics listed in Table 2 as agreed, not agreed or in discussion using a colour coding system. The system used throughout this document is summarised in Table 2 below.

Table 2 Colour coding system

Classification	Meaning
Agreed	Agreement has been reached between the parties
In discussion	This matter has not been 'agreed' or 'not agreed' but discussions are continuing, or information is to be provided with the intention of reaching agreement.
Not agreed (No material impact)	This matter has not been agreed, but discussions have been concluded and it is considered that it does not have a material impact.
Not Agreed	This matter has not been agreed, and discussions are not currently ongoing.

1.5 Consultation undertaken to date.

10. The Applicant has engaged with the EA from the commencement of the development process of the onshore aspects of the Project, regarding the crossings of main rivers and flood defences and the relevant flood risk assessments. The EA is part of the 'Expert Topic Group' relating to hydrology and hydrogeology and attended quarterly online presentations by the Applicant and its environmental consultant. In addition to the general briefings and consultations, specific meetings have been held to address topics relevant to the EA's statutory roles. Table 3 sets out the specific engagement conducted to date and the key discussion points.

Table 3 Engagement with the EA regarding specific topics

Engagement Date	Topic/ Key Discussion Points
Apr 2023	<ul style="list-style-type: none">▪ Project Introductions▪ Scoping of Issues▪ Project Updates▪ Geotechnical Investigations (beach borehole permit)▪ Beach Nourishment works▪ Project Landfall works▪ Flood defences and coastal assets▪ EA Steeping catchment management plans

Engagement Date	Topic/ Key Discussion Points
	<ul style="list-style-type: none"> Trenchless crossings Wainfleet relief channel bridge Construction assumptions
Jul 2023	<ul style="list-style-type: none"> Flood defences and coastal assets IDB crossing arrangements (for EA info only) EA Beach nourishment – outline SIMOPS agreements EA Steeping catchment management plan DCO and Protective Provisions OnSS flood resilience design Wainfleet relief channel bridge
Aug 2023	<ul style="list-style-type: none"> Submission of ODOW methodology for river Welland breach flood modelling for EA review
Sep 2023	<ul style="list-style-type: none"> EA (Estates): bridge ownership
Oct 2023	<ul style="list-style-type: none"> DCO and Protective Provisions Disapplication of EP Regulations Use of Environmental Permit exemptions EA Beach Nourishment – comments on SIMOPS Other EA assets OnSS flood risk modelling update OnSS flood protection proposals
Jan 2024	<ul style="list-style-type: none"> Landfall methodology Temporary flood protection during landfall installation TJB permanent site level East coast defences- commitment re cable depth Beach nourishment works Topics for SOCG
Jan 2024	<ul style="list-style-type: none"> Flood risk modelling report Flood modelling review arrangements Flood Risk Assessment (FRA) Sequential test FRA Exception test Topics for SOCG
Mar 2024	<ul style="list-style-type: none"> The EA's beach nourishment works at landfall - review of issues and the basis for a future agreement FRA approach for the noise bund at the landfall drill site
July 2024	<ul style="list-style-type: none"> Review of SOCG comments following receipt of the EA's 'Relevant Representations to PINS.
Aug 2024	<ul style="list-style-type: none"> Review of Relevant Reps and proposed responses re (1) Flood Risk and (2) Contaminated Land and Groundwater
October 2024	<ul style="list-style-type: none"> The Applicant's response to the EA's Relevant and Written Reps
November 2024	<ul style="list-style-type: none"> The Applicant's response to the EA's Relevant and Written Reps
December 2024	<ul style="list-style-type: none"> Beach works cooperation agreement
January 2025	<ul style="list-style-type: none"> Beach works cooperation agreement

2 Statement of Common Ground

2.1 Protection of the EA's existing assets and areas of responsibility

11. The following topics relate to EA's existing assets, and resources, it's protection and future maintenance.

Table 4 Protection of the EA's assets and areas of responsibility

ODOW Position		EA Position	Status
Identification and Protection of EA's existing assets			
<i>Crossing Schedule</i>			
EA1	The crossing schedule (Volume 3, Chapter 3 Project Description, Appendix 3.2 (document REP5-009)) and crossing plans (document REP4A-005) included in the application accurately identify the main rivers, coastal and flood defences for which the EA has responsibilities within the ODOW application boundary.	The EA agrees that the application accurately identifies the main rivers, coastal and flood defences. The EA is the principal flood risk management operating authority, which has the power (but not the legal obligation) to manage flood risk from designated main rivers and the sea.	
<i>Trenchless cable installation</i>			
EA2	Cable installation under the coastal defences, main rivers and associated defences will be undertaken by trenchless techniques as described in the outline Code of Construction Practice (CoCP) (document REP5-113))	The EA welcomes the Applicant's commitment to undertake crossings of coastal defences, main rivers and associated defences using trenchless techniques.	

ODOW Position		EA Position	Status
<i>Haul road crossings</i>			
EA3	<p>The Haul Road Crossings Location Plan (Figure 27.3, document APP-271) shows the haul road crossing route. No locations are identified where it is necessary to install a temporary bridge at a main river. All main river haul road crossings are achieved either using existing road bridges or using an EA bridge at the Wainfleet Relief Channel.</p>	<p>The EA is pleased to note that no temporary bridges will be required at main rivers and that all haul road crossings are achieved either using existing road bridge or using the EA's bridge at the Wainfleet Relief Channel.</p>	
<i>Construction access (Fosdyke Bridge)</i>			
EA4	<p>The Project includes the improvement and use of an existing farm and IDB pumping station access track adjacent to the river Welland flood defence at Fosdyke Bridge, within 16m specified of the tidal defence.</p> <p>The Applicant provided the EA with information regarding the proposals in this area and the EA accepted that the use of the access track adjacent to the River Welland will not undermine the stability of the flood defence at Fosdyke Bridge, as set out in REP1-048.</p>	<p>The Applicant has provided information in a Technical Note ('Access arrangements alongside the River Welland', ref: PP1-ODOW-DEV-CS-NOT-0087_03, dated 8 October 2024) to demonstrate that the use of the access track adjacent to the River Welland will not undermine the stability of the flood defence at Fosdyke Bridge. The Technical Note has provided the EA with the assurance it requested and this matter is now agreed.</p>	
<i>Stopping up of Highways</i>			

ODOW Position	EA Position	Status
EA5	<p>The Project draft DCO (document REP5-002) includes powers to stop up highways at all construction access locations, including Roman Bank, which is used by the EA to access its beach pull over at Wolla Point. The planned work that would potentially require the implementation of the stopping up powers at this location is the construction of the access point (AC-01), which would potentially require a short-term road closure for a number of days only, as a traffic management measure.</p> <p>The Applicant has committed to facilitate continued, unrestricted access over Roman Bank for the EA and any contractors working on its behalf (provided that the EA gives the Applicant reasonable notice of its need to take access over any part of Roman Bank which is temporarily stopped up) in the event that the EA's access is materially obstructed by reason of the stopping up or diversion of Roman Bank under the powers conferred by article 12 (temporary stopping up of streets) of the DCO. This is secured in the paragraph 8(2) of the protective provisions for the protection of the Environment Agency forming Schedule 18. Part 5 of the DCO (document REP5-002).</p>	<p>The EA needs to maintain access along Roman Bank to enable it to carry out beach nourishments and associated works and be able to access/use its compound/depot at all times. The EA seeks an assurance that it will either be consulted in advance of any prohibition to utilise Roman Bank or given private access rights and an alternative access or means of secure storage for its equipment.</p> <p>The Applicant suggested that this matter could be secured through Protective Provisions and the EA agreed that this will be appropriate. This is now secured in paragraph 8(2) of the Protective Provisions for the protection of the Environment Agency in Schedule 18, Part 4 of the DCO. This matter is now resolved.</p>
<i>Beach access</i>		

ODOW Position		EA Position	Status
EA6	<p>The Applicant has committed to install the cables under Anderby Beach by means of trenchless technique. This is secured in requirement 9(4) of the draft DCO (document REP5-002).</p> <p>It has been agreed between the parties in the beach works cooperation agreement that in the unlikely event that ODOW does require to access Anderby Beach at ground surface level, ODOW will not do so without first securing the Agency's prior written approval to do so.</p>	<p>The EA understands that the construction of the Project does not require works to be undertaken on the beach and access to this would only be required during an emergency. The EA seeks to ensure that if emergency access is required then construction traffic does not utilise the Anderby Creek Tunnel for this or impact the stability of the flood defences whilst obtaining access to the beach.</p> <p>Any emergency access to the beach will require prior approval from the EA, which is secured via the Protective Provisions in Schedule 18, Part 4 of the DCO.</p>	
Protection of Bathing Water quality			
EA7	<p>The Project landfall HDDs will be designed to exit the seabed in pre-excavated pits, a minimum distance of 500m from the inter-tidal area, to avoid potential impacts to bathing water quality. The Applicant has committed to installing the exit pits a minimum of 500m from MLWS offshore in the outline Code of Construction Practice (document REP5-113) and the outline Cable Specification and Installation Plan (document REP4A-096).</p> <p>The EA confirmed that this matter is resolved in its Written Representation REP1-048-1.9 (REP1-048).</p>	<p>The EA no longer seeks the inclusion of an additional condition in Schedule 11, Part 2 of the DCO to protect Bathing Waters as it is satisfied that the commitment that the HDD exit pits will be no closer than 500m to the MLWS mark has been appropriately secured in the outline Code of Construction Practice and the outline Cable Specification and Installation Plan.</p>	
The Draft DCO and Requirements			

ODOW Position		EA Position	Status
EA8	The draft DCO (document REP5-002) includes the requirements necessary to protect the EA's assets and operations, including the EA being a consultee in the approval process for activities relevant to the protection of its assets and its statutory roles.	The EA agrees that all Articles and Requirements (relevant to its remit) contained in the latest draft DCO [REP4a-006] are drafted appropriately and include the EA as a consultee, prior to discharge, where appropriate.	
Protective Provisions			
EA9a	The protective provisions for the protection of the Environment Agency forming Schedule 18, Part 4 of the draft DCO (document REP5-002) are agreed between the Applicant and the EA., The side agreement, relating to the EA's beach nourishment works has been finalised.	Protective Provisions for the benefit of the EA are agreed. The Protective Provisions, as included in Schedule 18, Part 4 of the draft DCO (document REP5-002), have been drafted to work alongside a legal agreement, which the Applicant has signed.	
Disapplication of legislation			
EA9b	The draft DCO (document REP5-002) Article 7 (Application and modification of legislative provisions) disapplies certain provisions of the Environmental Permitting (England and Wales) Regulations 2016 and provisions of any byelaws made under or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991. Article 7 of the DCO (Application and modification of legislative provisions) insofar as it disapplies legislative provisions relevant to the EA, is agreed, following the agreement of Protective Provisions and the beach nourishment works side agreement.	Protective Provisions for the benefit of the EA are agreed. These have been drafted to work alongside a legal agreement, which the Applicant has signed. The EA's agreement to the disapplication of the Environmental Permitting (England and Wales) Regulations 2016, as included in Article 7 of the draft DCO (document REP5-002), was confirmed by formal letter to the Applicant on 4 April 2025.	

ODOW Position	EA Position	Status	
Exempt flood risk activities / Cable installation			
EA10	<p>For cable installation crossings under a main river, which meet the requirements of Flood Risk Activity Exemption 3 (FRA3), the applicant will submit exemption notifications. Subject to complying with FRA3, exemptions will be registered for cable installation at the following main rivers:</p> <ul style="list-style-type: none">- Willoughby High Drain- River Lymn- Steeping River- Wainfleet Relief Channel- River Welland (Fosdyke) <p>Subject to specific construction parameters being met to comply with the exemption requirements.</p> <p>Activities that do not meet the relevant exemption requirements will be carried out in accordance with the requirements of the protective provisions.</p>	<p>The EA is satisfied with the Applicant’s proposal to utilise FRA3 where it can meet the exemption requirements and submit details to be approved under the Environmental Permitting Regulations 2016 (which may be substituted by Protective Provisions on agreement of wording for these to be included in Schedule 18, Part 4 of the DCO – see EA9a above), where it cannot.</p>	

ODOW Position		EA Position	Status
	<p>The following works are not considered to meet the requirements of FRA3 and details will be submitted for approval in accordance with the requirements of the protective provisions.</p> <ul style="list-style-type: none"> - Trenchless landfall cable installation under the coastal defenses - Trenchless cable installation at the Haven (River Witham) - Access road construction activities (River Welland, Fosdyke Bridge) 		
EA Saltfleet – Gibraltar Point annual beach nourishment works / Landfall installation			
EA11	<p>The Applicant and the EA have negotiated a Beach Works Cooperation Agreement to govern coordination of the Applicant's works and the EA's annual beach nourishment works. The agreement includes provision for the EA to withdraw its holding objection. This agreement has now been completed.</p>	<p>The EA submitted a holding objection on the grounds of the potential increase in flood risk to third parties that could be caused if the installation of the ECC interferes with/delays the annual beach nourishment works, which take place at the landfall location.</p> <p>The Applicant has now signed a legal agreement with the EA to ensure the ECC works do not prejudice the beach nourishment works. Accordingly, the holding objection is now resolved/withdrawn.</p>	
EA East Coast Defences / Landfall installation			

ODOW Position	EA Position	Status
EA12	<p>The EA's current strategy for maintaining the coastal defences at the landfall point for the Project is through annual beach nourishment. This may change in the future, and it may be necessary to install sheet piles as a form of defence. The applicant has demonstrated to the EA that the cables will be installed at sufficient depth to allow for pile installation and the EA will have the opportunity to review and approve the cable installation design at this location, pre-construction.</p> <p>The Applicant has requested that it is consulted in advance of any pile driving within 10m of the cables in order to confirm that the works will be carried out safely.</p> <p>The EA confirmed that this matter is resolved in its Written Representation REP1-048-3.1 (REP1-048)</p>	
EA Steeping River Catchment Management Plan		
EA13	<p>The EA has a Steeping Catchment Action Plan which may, in the future, involve bank reinforcement works at the Steeping River and Wainfleet relief channel. The applicant has engaged with the EA regarding these crossings, and it is agreed that the depth of crossing will be sufficient to avoid any interference with future works</p>	

2.2 Hydrology and hydrogeology, flood risk, ground water and water framework directive assessments

2.2.1 The following aspects relate to the assessments that the applicant has submitted in support of its application.

Table 5 Assessments

ODOW Position		EA Position	Status
Hydrology, Hydrogeology and Flood Risk			
EA14	<p>The applicant has carried out and presented, in the project Environmental Statement, assessments of potential impacts of the project upon hydrology, hydrogeology and flood risk and identified mitigation measures where appropriate.</p> <p>The conclusions of the assessments are that the project will not have any significant impacts upon hydrology, hydrogeology or flood risk and all potential impacts are low.</p>	<p>The EA has reviewed the updated Chapter 24 document [REP4a-017], additional information and responses from the Applicant on these topics and is satisfied that all matters (within its remit) have been appropriately assessed and mitigation, as required, is adequately secured through the DCO.</p>	
Groundwater Risk Assessment			
EA15	<p>The applicant has carried out an assessment of the project in relation to groundwater receptors, which concludes that the potential impact to private water supplies and other receptors is low.</p> <p>In response to the EA's Relevant Representation, the applicant is has committed to providing Water Quality Management and Mitigation Plan to formalise the protection of groundwater during construction.</p>	<p>The EA set out its comments in respect of this Assessment in sections 12 and 13.2 of its Relevant Representation.</p> <p>All matters of concern have been addressed by the Applicant and the EA is satisfied that the final Groundwater Risk Assessment will be produced prior to the commencement of development, in consultation with the EA, as secured through Requirement 18(2)(j) of the DCO.</p>	

ODOW Position	EA Position	Status
	<p>Requirement 18 (code of construction practice) of the draft DCO (REP5-002) has been updated to require that the CoCP to be submitted for approval prior to commencement of any stage of the onshore transmission works includes a Water Quality Management and Mitigation Plan. The outline CoCP (REP4A-075) has been updated to include an outline of this plan and a commitment that the GWRA will be updated prior to producing this plan.</p> <p>The EA confirmed that this matter is resolved in its Deadline 3 representation (REP3-064).</p>	
Flood Risk Assessment – ECC and 400kV cable corridor		
EA16	<p>The applicant has carried out a flood risk assessment for the ECC and 400kV cable corridor, including the sequential and exception tests. The assessment has considered the relevant sources of flooding.</p> <p>In conclusion, based on the information outlined within the FRA, the perceived level of flood risk to, and caused by the construction, maintenance, and operation of the onshore ECC and 400kV cable corridor is low, and the Project would be safe under the assessed flood conditions, without any material increase to flood risk elsewhere.</p>	<p>The EA set out its comments in respect of this Assessment in section 13.3 of its Relevant Representation, making a holding objection due to insufficient information in the FRA to determine if the project satisfies the flood risk Exception Test (as required by EN-1 paragraph 5.8.11).</p> <p>All matters of concern have now been addressed by the Applicant through the submission of additional modelling, technical notes, and an amended FRA [REP4-022 part 1 and REP4-024 part 2].</p>

ODOW Position		EA Position	Status
		<p>The EA is satisfied that the FRA provides an assessment that is appropriate to the scale, nature and location of the development and is sufficient to inform consideration of the 2nd bullet point of the flood risk Exception Test, as required by EN-1.</p> <p>Accordingly, the holding objection is now resolved/withdrawn.</p>	
Flood Risk Assessment – OnSS			
EA17	<p>The applicant has consulted with the EA to establish the correct parameters for the flood risk assessment and the scope of the modelling required to establish the maximum flood depth level that the site needs to be protected against.</p> <p>The applicant has carried out the appropriate hydraulic modelling of a breach of defences and the indicative design arrangements provide the appropriate level of protection.</p> <p>The applicant has correctly followed the process of the sequential and exception tests in relation to the OnSS, including the consideration of 75 years of climate change.</p> <p>The OnSS indicative design will ensure that the site will remain operational, and equipment will be safe under the maximum modelled flood scenario.</p>	<p>The EA sets out its comments in respect of this Assessment in section 13.4 of its Relevant Representation, making a holding objection due to the current hydraulic modelling underpinning the FRA not yet being considered fit for purpose.</p> <p>All matters of concern have now been addressed through the submission of additional modelling, technical notes and an amended FRA [REP4-027 part 1 and REP4-028 part 2].</p> <p>The EA is satisfied that the FRA provides an assessment that is appropriate to the scale, nature and location of the development and is sufficient to inform consideration of the 2nd bullet point of the flood risk Exception Test, as required by EN-1.</p> <p>Accordingly, the holding objection is now resolved/withdrawn.</p>	

ODOW Position		EA Position	Status
	In conclusion, based on the information outlined within the FRA, the perceived level of flood risk to, and caused by the construction, maintenance, and operation of the onshore substation is low, and the Project would be safe under the assessed flood conditions, without any material increase to flood risk elsewhere.		
Outline Code of Construction Practice (CoCP)			
EA18	The applicant has prepared an outline Code of Construction Practice (Document REP4A-075) which the final CoCP(s) to be submitted for approval prior to construction will be in accordance with. The EA agrees that this draft outline plan is appropriate and secures mitigation measures requested by the EA during the Examination of the DCO. The EA will be consulted on the final CoCP(s) submitted for approval under Requirement 18 of the DCO. The EA confirmed that the incorporation of the Water Quality Management and Monitoring Plan into the COCP was acceptable in its Deadline 3 submission (REP3-064).	<p>The EA is generally satisfied with the scope of topics included in the Outline CoCP and welcomes its inclusion as a consultee to Requirement 18 in the DCO to enable it to review and advise on the final document.</p> <p>The EA welcomes the additional Water Quality Management and Mitigation Plan (PD1-038) to be incorporated into the CoCP and the confirmation that the revised Groundwater Risk Assessment will be an appendix to this Plan.</p>	

ODOW Position	EA Position	Status
Outline Construction Management Plans / Strategies		
EA19	<p>The applicant has prepared a suite of outline management plans relating to the management of construction activity and the implementation of mitigation measures. The EA has reviewed the plans and agrees that these are acceptable in relation to topics relevant to the EA.</p> <p>The EA is satisfied with the scope of topics included in the:</p> <ul style="list-style-type: none"> 2.2.2 Outline Soil Management Plan (REP4a-079); • Outline Pollution Prevention and Emergency Incident Response Plan (APP-272); 2.2.3 Outline Site Waste Management Plan (APP-274); 2.2.4 Outline Project Environmental Management Plan (REP4a-094); 2.2.5 Outline Cable Specification and Installation Plan (REP4a-096); • Outline Operational Drainage Management Plan (APP-286). 	

ODOW Position		EA Position	Status
Land Contamination			
EA20	<p>The Applicant has assessed potential impacts from contaminated land in ES Chapter 23 (REP4A-015 and Appendix 1 (Preliminary Land Quality Risk Assessment) (REP4A-056). The assessment provided is satisfactory and demonstrates that an appropriate assessment has been undertaken to identify potential sources of contamination.</p> <p>Requirement 16 in the draft DCO (REP4A-006) secures further investigation and assessment at the appropriate time and will enable the EA to provide advice as a consultee to its discharge.</p>	<p>The EA sets out its comments in respect of this Assessment in section 12 of its Relevant Representation. The EA is satisfied that Chapter 23 and Appendix 1 (Preliminary Land Quality Risk Assessment) are satisfactory and demonstrate that an appropriate assessment has been undertaken to identify potential sources of contamination. Requirement 16 in the draft DCO secures further investigation and assessment at the appropriate time and will enable the EA to provide advice as a consultee to its discharge.</p>	
Book of Reference			
EA21	<p>The applicant has identified the EA's interests in land in the Book of Reference (REP4-013) and the Land Plan (REP4-003-4)) and the proposed protective provisions provide the necessary protection required.</p>	<p>The EA is listed as a Category 1 (as assumed owner, or reputed owner) for various plots in the Book of Reference. The EA's Estates Department is liaising with the Applicant on this matter and does not have any comments to submit into the Examination regarding this.</p>	

2.3 Offshore

2.3.1 The following aspects relate to the assessments that the applicant has submitted in support of its application.

Table 6 Offshore elements

ODOW Position		EA Position	Status
Marine Physical Processes			
EA22	<p>Methodologies within the Marine Physical Processes Chapter (REP4A-151) have been agreed through the evidence plan process and engagement with consultees. The National Coastal Erosion Mapping 2 (NCERM2) was included as an additional data source to support the conclusions only; use of these data does not change the conclusions of the assessment. When the NCERM2 data becomes available, the assessment can be updated if required.</p>	<p>The EA published NCERM2 data in January 2025 and this is now referenced within the assessment.</p>	
EA23	<p>Beach nourishment has been undertaken along the coast for more than 30 years. Although there is no certainty that this will continue, it is understood that there is an ongoing requirement. In the event that the replenishment scheme is not continued, coastal erosion has been considered in the design of the HDD, cable burial depth and position of the onshore transition pit.</p> <p>The Applicant has provided the EA with indicative cable installation depth under the coastal defences which it believes will safeguard the project against future erosion. The depth of cable burial under the sea defences is a detail that requires pre-construction approval by the EA under the protective provisions for the protection of the EA.</p>	<p>The EA is satisfied that the assessment in respect of potential impacts on coastal erosion is appropriate. The EA takes comfort from the indicative burial depth for the cable and this will ultimately be approved prior to construction by the EA under its Protective Provisions.</p>	

	ODOW Position	EA Position	Status
EA24	<p>The Chapel Point to Wolla Bank SSSI is designated for glacial sedimentary geological features; the exit pit will avoid interaction with the SSSI and therefore the Applicant's position is that there is no pathway of effect on this receptor.</p> <p>The potential impact of cable installation works upon the SSSI is considered in ES Chapter 23, Geology and Ground Conditions (document REP4A-015) section 23.7.1.4 'Designated Sites'.</p> <p>The Applicant has also submitted a Preliminary Land Quality Risk Assessment (PLQRA) Appendix 23.1 (document REP4A-056), which assesses the risk to the SSSI.</p> <p>The Applicant is undertaking geo-technical investigations which will be used to inform the detailed design of the landfall installation including micro-siting of the exit pits.</p>	<p>The EA welcomes the use of geo-technical investigations, which will aid in the micro-siting of the exit pit and cable protection (if used). The EA does not wish to submit any further comments on this matter and defers to Natural England in respect of issues relating to the SSSI.</p>	
EA25	<p>The Applicant has undertaken a robust impact assessment and concluded that the dune system will not be impacted. The dunes were assessed as a sensitive receptor within Impact 3 and 4 of the Marine Physical Processes chapter (paragraph 7.12.1.3).</p>	<p>The EA is satisfied that all issues in respect of marine physical processes have been addressed in the ES and supporting documents.</p>	

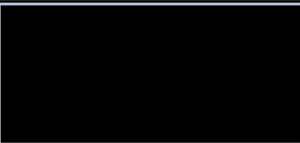

ODOW Position		EA Position	Status
	The dunes are also considered in the Preliminary Land Quality Risk Assessment (PLQRA) Appendix 23.1 (document REP4A-056), where these form part of a designated site.		
Marine Water and Sediment Quality			
EA26	The assessment undertaken for Marine Sediment and Water Quality is robust and appropriate.	The EA has reviewed Chapter 8 with respect to its remit on this topic and this is satisfactory.	
Water Framework Directive			
EA27	<p>The Water Framework Directive assessment considers the potential for a reduction in water quality within the Lincolnshire coastal water body and relevant bathing waters at Moggs Eye and Anderby. Any changes are expected to be short lived and within the natural variation of the marine environment.</p> <p>The Project landfall HDDs will exit the seabed in pre-excavated pits, a minimum distance of 500m from MLWS, to avoid potential impacts to bathing water quality. The Outline CoCP and Outline Cable Specification and Installation Plan secure that the landfall exit pits will be a minimum of 500m offshore from MLWS. The EA confirmed that it is now satisfied with this in its summary of written representations to the ExA (REP1-055).</p>	<p>The EA notes that paragraph 152 of the WFD acknowledges that disturbance of the seabed, which can be associated with cable installation and associated landfall works, may release sediment bound contaminants into the water column and therefore reduce water quality. Paragraph 154 also acknowledges that an increase of suspended sediment (including bentonite) from cable installation and trenchless technique activities at the landfall has the potential to result in an increase in bacterial counts within the water column. It is stated that 'any bacterial increase within the water column would be in the order of days'.</p> <p>The EA notes that the ES concludes that the works will not cause an issue to bathing water quality but this is not supported with any evidence.</p>	

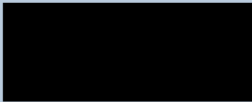

ODOW Position		EA Position	Status
		<p>The EA challenges the assumption that 'The consistent 'Excellent' performance of nearby Bathing Waters indicates that the levels of bacteria within the sediments, in close proximity to these Bathing Waters, do not result in a reduction in water quality during natural elevated suspension events' and that 'This suggests that elevated bacterial concentrations are unlikely to result from disturbance of seabed sediments in the vicinity of these Bathing Waters'.</p> <p>However, the EA is satisfied that the Applicant has now committed to the HDD exit pits being no closer than 500m from the MLWS mark and this mitigation has been appropriately secured in the outline Code of Construction Practice and the outline Cable Specification and Installation Plan.</p> <p>Accordingly, the Environment Agency confirms that it is now satisfied with the conclusions of the WFD in relation to Bathing Waters.</p>	
EA28	The Water Framework Directive assessment undertaken in relation to the impacts of the project on the Lincolnshire Coastal water body is robust and appropriate	The EA is generally satisfied with the Applicant's approach and conclusions that these sections of the export cable corridor activity are unlikely to result in a deterioration at water body scale or jeopardise the attainment of water body objectives. Significant impacts to protected areas within these WFD waterbodies are also unlikely.	

ODOW Position		EA Position	Status
		However, we defer to Natural England and the Marine Management Organisation in respect offshore habitats in protected areas, fish and shellfish etc, which are outside of the EA's jurisdiction.	
Benthic and Intertidal Ecology			
EA29	The assessment undertaken for Benthic and Intertidal Ecology is robust and appropriate.	The EA have reviewed Chapter 9 with respect to the EA's remit on this topic and this is satisfactory.	
Fish and Shellfish Ecology			
EA30	The assessment undertaken for Fish and Shellfish Ecology is robust and appropriate.	The EA have reviewed Chapter 10 with respect to the EA's remit on this topic and this is satisfactory.	

3 Signatures

12. The above statement of common ground has been prepared by Outer Dowsing Offshore Wind and the EA and is agreed on the date below.

Signed for the EA 	
Name	
Position	Principal Planning Adviser
Date	4 th April 2025
Duly authorised for and on behalf of the Environment Agency	

Signed for Outer Dowsing Offshore Wind 	
Name	
Position	Development Manager
Date	4 th April 2025
Duly authorised for and on behalf of Outer Dowsing Offshore Wind	