MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 3.2.3 to Response to RR - Environment Agency (RR-677)

Deadline: Procedural Deadline
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-JVW-19013
MOR001-FLO-CON-CAG-RPT-0019

Document Reference: S_PD_3.2.3

11 April 2025
F01

Document status					
Version	**Purpose of document**	**Approved by**	**Date**	**Approved by**	**Date**
F01	Procedural Deadline	AS	April 2025	IM	April 2025

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1.1 Introduction

1.1.1.1 Following closure of the relevant representation period under Section 56 of the Planning Act 2008 for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to as 'the Transmission Assets') (the Applicants), the Applicants have taken the opportunity to review each of the Relevant Representations (RRs) received from stakeholders who registered as Interested Parties in the examination.

1.1.1.2 Table 2.1 provides an overview of the Applicants' response to the Relevant Representation of Environment Agency (RR-677).

2 Responses to Relevant Representations

2.1 Environment Agency

Table 2.1: RR-0677– Environment Agency (EA)

Reference	Relevant Representation Comment	Applicants' response
RR-0677 0677.1	**1. Ecology** When high voltage cables go under rivers there is potential for the electromagnetic field (EMF) generated to impact on fish behaviour. In the absence of conclusive evidence of no impact, we adopt the precautionary principle and require that appropriate measures are put in place by the developer, so that no detectable EMFs result from the installation of underground cables within the wetted area of an inland waterbody. This is in line with planning policy NPS EN3. Whilst we support an increase in depth as mitigation, details on the reasoning behind the depth chosen should be provided, with evidence that magnetic fields at this depth will not be detectable from the cable within the wetted area. If sufficient evidence cannot be presented, then it is likely that a requirement for monitoring of EMF levels where cables are laid under watercourses will be required.	EMFs occur naturally as well as being produced wherever electricity is generated, transmitted or used. The UK Government has adopted the 1998 Guidelines for Limiting Exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) produced by the International Commission on Non-Ionising Radiation Protection (ICNIRP). With regard to potential EMF impacts, the Transmission Assets will adopt the ICNIRP guidelines and Government voluntary Code of Practice on EMF public exposure. Such considerations are inherent to the detailed engineering considerations of cable specification and routing. (see CoT106 of Volume 1, Annex 5.3: Commitments register of the ES (AS-030)). Please refer to the EMF Compliance Statement for further information (Volume 1 Annex 3.4 of the ES (APP-029)). The Applicants present in Table 3.33 of Volume 1, Chapter 3: Project description (AS-024), depth of cable burial below the Ribble River as 7-45 m. The ranges of EMFs when buried are known to only extend a few metres around the cable (see section 3.11.7 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-048). For the Ribble Estuary crossing, the much greater cable burial depth will mean that EMFs will be negligible at the riverbed and as such smelt will not be capable of detecting these and therefore there is no impact. Regarding potential EMF monitoring, no specific monitoring is proposed in Volume 2, Chapter 3: Fish and shellfish ecology (APP-048) as the potential impact of EMF on fish is assessed as a minor adverse effect, which is considered not significant in Environmental Impact Assessment (EIA) terms.
RR-0677 0677.2	It is noted that a number of ecological surveys are being carried out to inform the detailed Ecological Management Plan, as secured by requirement 12. We request that the	The Outline Biosecurity Protocol (APP-205), forms part of the Code of Construction Practice (CoCP) (APP-193). The detailed CoCP(s) and accompanying plans/protocols are secured by Requirement 8 of Schedules 2A and 2B of the draft Development

Reference	Relevant Representation Comment	Applicants' response
	Environment Agency is included as a consultee under requirement 12 and look forward to reviewing these documents in order to advise the determining authority accordingly. These include: • the detailed Biosecurity Plan • the outstanding water vole surveys • mitigation measures for otters Habitat creation and improvement proposals especially regarding Lea Marsh Fields and Dow Brook.	Consent Order (DCO) (AS-004). Detailed CoCP(s), including detailed biosecurity protocols, will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders (including the Environment Agency), as appropriate. With regards to water vole surveys, the Applicants refer to their response to RR-0677 0677.12. The Applicants confirm that water vole surveys were undertaken in late August, September and early October 2024 as part of the wider water vole survey programme. The Applicants confirm that Volume 3, Annex 3.9: Water Vole Survey Technical Report (APP-083) will be updated and submitted at Deadline 1 of the Examination to show the location of these surveys. The Applicants also confirm that no new evidence of water vole were identified during the late August to early October surveys to that which was reported in Volume 3, Annex 3.9: Water Vole Survey Technical Report (APP-083). The Applicants note the Environment Agency's desire to be a consultee in regards to otter mitigation at Lea marsh which is outlined within the Outline Ecological Management Plan (OEMP) (APP-212). The requirement to produce the detailed EMP(s) in accordance with the OEMP for approval by the relevant local planning authorities, is secured by Schedules 2A and 2B of Requirement 12 of the draft DCO (AS-004). The Applicants can confirm that they are engaging with the Environment Agency to discuss their concerns and will provide an update to the Examining Authority at Deadline 2. Additionally, the Applicants also note the Environment Agency's comments in regards to habitat improvements associated with the Biodiversity Benefit Statement and will proactively engage with them on this matter in a meeting to be held on 24 April 2025.
RR-0677 0677.3	**2. Flood Risk** The works will require detailed project design, and the Environment Agency requests early involvement in the development of these details. Please see Appendix 2 for suggested text for requirements regarding consultation on design details. Following DCO approval, we request ongoing consultation with the EA regarding the construction of works. This should be secured through amendments to the Outline	**Requirement for consultation on detailed design** The Applicants thank the Environment Agency for the suggested text within Appendix 2 of the Environment Agency's Relevant Representation. The Applicants are committed to ongoing consultation with the Environment Agency through the detailed design stage. This is secured by protective provisions in favour of the Environment Agency, provided in Schedule 10 Part 9 of the draft DCO (AS-004) which provide detail as to where the Environment Agency must be consulted on plans and details of works carried out by the Applicants. On this basis, the Applicants do not consider the proposed additional requirement is necessary.

Reference	Relevant Representation Comment	Applicants' response
	Communications Plan to provide regular joint meetings with relevant stakeholders. It is noted that the applicant intends to disapply FRAPS. We have yet to see the detail of this and thus we do not agree to the disapplication until further details are received and the relevant protective provisions are in place.	**Disapplication of FRAPS** The Applicants note the Environment Agency's comment relating to protective provisions and the disapplication of FRAPS. The Applicants have provided information within the DCO Application to demonstrate that the flood risk will be managed effectively. This includes the Flood Risk Assessment (FRA) (APP-073) which has sufficiently considered the potential flood risk associated with the construction of the onshore infrastructure for the Transmission Assets. Taking into account commitments proposed in section 2.8 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070), the Transmission Assets have a low to very low risk of flooding from all assessed sources and flood risk will not be increased as a result of the development. Volume 1, Chapter 3: Project description of the ES (AS-024), provides details about construction of the Transmission Assets and further details of site-specific works including site-specific crossing method statement(s) will be prepared at detailed design, and submitted to the relevant authorities including the Environment Agency for approval prior to construction. The process for approvals from the v is secured by protective provisions in favour of the Environment Agency provided in Schedule 10 Part 9 of the draft DCO (AS-004). The Applicants are in the process of agreeing the final form of these protective provisions and issued the latest turn to the Environment Agency on 8th April 2025. The above details provided supports the Applicants request to disapply FRAPS. **Outline Communications Plan** The Applicants will develop detailed Communications Plan(s) in line with the Outline Communications Plan (APP-194) which sets out a framework for engaging stakeholders and forms part of the Outline CoCP (APP-193). This is secured by Requirement 8 of the draft DCO Schedules 2A & 2B (AS-004). However, the intention of the Outline Communications Plan (APP-194) and subsequent detailed Communications Plan(s) is in relation to wider stakeholder and community communications around the Transmission Assets in the lead up to, and during construction. Communication and consultation with the Environment Agency is specifically secured via protective provisions in favour of the Environment Agency secured in the draft DCO, which require that the Environment Agency be consulted on and will approve any plans and details of applicable construction works. This is set out in Schedule 10 Part 9 of the Draft DCO (AS-004). Similarly, the Environment Agency is named as a consultee on Requirement 8 (Code of Construction

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		Practice) of Schedules 2A and 2B of the draft DCO, ensuring that Environment Agency will be consulted in relation to their statutory remit prior to and during construction. Therefore, the Applicants do not consider it necessary to make the proposed amendment to the Outline Communications Plan (APP-194).
RR-0677 0677.4	**3. Geology** To manage the risks associated with the installation of the cables a Hydrogeological risk assessment is required for the installation of cables beneath the sand dunes, and for the River Ribble crossing. These must include risk assessment and clarification of the depths of the dewatering that will be required for entry/exit shafts. Please see Appendix 2 for suggested text for requirements. To manage the risks to groundwater associated with deep piled foundations a Foundation Works Risk Assessment is required for any onshore piled structures including the substations. Please see Appendix 2 for suggested text for requirements.	**Requirements for Hydrogeological Risk Assessments** The Applicants have made commitments (CoT128 and CoT41 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to undertake hydrogeological risk assessment(s) in relation to the crossing of Lytham St Annes Dunes SSSI specifically and where the onshore export cable corridor or 400 kV grid connection cable corridor crosses sites of particular sensitivity (e.g. embanked Environment Agency surface watercourses such as the River Ribble). CoT128 is currently secured via Requirement 12 of Schedules 2A & 2B of the draft DCO (Ecological Management Plan (EMP)). This is an error in the Commitment Register (AS-030) which will be updated at Deadline 1, as both CoT128 and CoT41 are secured under Requirement 8 (CoCP) of Schedules 2A & 2B of the draft DCO (AS-004). As stated within Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004), the Environment Agency will be consulted on the detailed Code of Construction Practice(s). The Applicants thank the Environment Agency for the suggested text stated under '1. Hydrogeological Risk Assessment (HyRA)' in Appendix 2 of the Environment Agency's Relevant Representation. The Applicants consider that the commitments (CoT128 and CoT41) to undertake hydrogeological risk assessments are adequately secured under Requirement 8 of Schedules 2A & 2B of the draft DCO (AS-004). On this basis, the Applicants do not consider the proposed additional requirement is necessary. **Requirements for Foundation Risk Assessment** The Applicants have made a commitment (CoT103 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to undertake detailed Piling Risk Assessment(s) as required, where suspected contamination is present and piling is proposed. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Piling Risk Assessments will be implemented, as required, by the Applicants in consultation with the Environment Agency.

Reference	Relevant Representation Comment	Applicants' response
		The Applicants thank the Environment Agency for the suggested text stated under '2. Additional Requirement: Foundation Works Risk Assessment' in Appendix 2 of the Environment Agency's Relevant Representation. The Applicants consider that the commitment (CoT103) to undertake a piling risk assessment is adequately secured under Requirement 8 of Schedules 2A & 2B of the draft DCO (AS-004). On this basis, the Applicants do not consider the proposed additional requirement is necessary.
RR-0677 0677.5	**4. Amended Requirements** We request that the wording of the following Requirements is amended to state that approval by the local planning authority is in consultation with the Environment Agency: • Requirements 4 - Substation works; • Requirement 6 - Provision of landscaping • Requirement 12 - Ecological Management Plan	The Applicants note the Environment Agency's wish to be a consultee for Requirements 4, 6 and 12. With regards to substation works (Works Nos. 21A23A and 21B23B of Part 1 of Schedule 1 of the draft DCO (AS-004)), the Applicants consider the Environment Agency's interest is with respect to the onshore substation drainage outfalls to the Dow Brook. The Applicants have committed (see CoT11 of Volume 1, Annex 5.3: Commitments register of the ES (AS-030)) to preparation of detailed Operational Drainage Management Plans which will include drainage outfall design of the onshore substations to the Dow Brook. The detailed plans will be developed in accordance with the outline Operational Drainage Management Plan (APP-215), which will be submitted to and approved by Lancashire County Council in consultation with the Environment Agency. This is secured via Requirement 20 of Schedules 2A and 2B of the draft DCO (AS-004). On this basis, the Applicants do not consider it necessary to amend the Requirement 4 to include the Environment Agency as consultee. The Applicants can confirm that landscape mitigation planting within the onshore substations will be set back a minimum of 8 m from Dow Brook. Volume 1, Annex 5.3: Commitments register of the ES (AS-030) will be updated to include this new commitment at Deadline 1. On this basis, the Applicants do not consider it necessary to amend the Requirement 6 to include the Environment Agency as consultee. As outlined in RR-0677.2, the Applicants can confirm that they are engaging with the Environment Agency to discuss their concerns and will provide an update to the Examining Authority at Deadline 1.

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RR-0677 0677.6	**5. Timescales** Schedule 12 – Approval of matters specified in requirements In order for the Environment Agency to advise determining authorities in the discharge of requirements we need sufficient time to review documentation. Therefore, we require **21 days** to review consultations on matters specified in requirements.	The Applicants note the Environment Agency's request of 21 days to review consultations on matters specified in requirements under Schedule 12 of the draft DCO (AS-004). The Applicants will update Paragraph 5 of Schedule 12 of the draft DCO (AS-004) to add the following wording into sub paragraph (1): 'or a longer period is agreed with both the undertaker and the discharging authority'.
RR-0677 0677.7	**6. Protective Provisions** Schedule 10 Part 9: For the protection of the Environment Agency. We have provided the applicant with our standard wording and expect to be able to agree this in due course. Please see further advice on this topic in Appendix 3.	The Applicants note comments relating protective provisions of the Environment Agency. The Applicants are in the process of agreeing the final form of these protective provisions and issued the latest version to the Environment Agency on 8th April 2025.
RR-0677 0677.8	**7. Remaining detailed points which have not been addressed** Further detailed issues and comments which need to be resolved and/or noted by the developer have been identified in Appendix 1.	This is noted by the Applicants and the points have been responded to below.
RR-0677 0677.9	**8. Work package tracker** The Environment Agency tracks its position through the planning process. Please see Appendix 4 to see this tracker.	This is noted by the Applicants and will proactively engage with the Environment Agency on the outstanding matters to feed in to the relevant Statement of Common Ground, as a part of the Examination.
RR-0677 0677.10	**9. Consents Strategy** It is recommended that a consents strategy is included which outlines what additional consents are required for this project. This is to ensure all parties (including the	The Applicants would direct the Environment Agency to the Consents and Licences Required Under Other Legislation (APP-232). This sets out the consents which the Applicants currently anticipate may be required that are not sought under the draft Development Consent Order (AS-004), and consents that

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	public) are aware of what is being address and under what consent. This is to increase transparency is the process.	the Applicants are seeking to disapply within the draft DCO (AS-004) which as a result, will not need to be applied for separately.
RR-0677 0677.11 (Appen. 1 APP-088)	**Invasive non-native species technical report** **Fig 1.2-1.7:** Maps from Figure 1.2 to 1.7 have incorrectly identified the Common Frog listed as a Schedule 9 INNS record from the ecology surveys. However Common Frog is not on the list of Schedule 9 invasive species. Wrong information can be misleading Review and amend the maps. **1.4.1:** We request the opportunity to review the detailed Biosecurity Plan through consultation under amended Requirement 12.	The Applicants note that Common Frog has been incorrectly shown on Figures 1.2 to 1.7 of Volume 3, Annex 3.14: Invasive Non-native Species Technical Report (APP-088). This will be added to the errata sheet submitted into Examination at Deadline 1. The Outline Biosecurity Protocol (APP-205), forms part of the Outline Code of Construction Practice (CoCP) (APP-193). The detailed CoCP(s) and accompanying plans/protocols are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed CoCP(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders (including the Environment Agency), as appropriate.
RR-0677 0677.12 (Appen. 1 APP-083)	**Water vole survey technical report** **Section 1.2.4.16 and 1.2.4.17:** Water vole surveys have been undertaken following periods of weather extremes. The surveys in June 2023 were undertaken following an extended period of hot dry weather. The survey in April 2024 was undertaken following a period of heavy rainfall. Possible under-recording. Evidence of water vole are less likely to be recorded following dry weather, and evidence may be washed away during heavy rainfall. The report confirms that 'late season' water vole surveys were ongoing at the time of DCO submission. Once complete this report should be updated to reflect the results and submitted for review.	A campaign of water vole surveys was undertaken between April 2023 and July 2024 on land parcels with habitat that could potentially support water vole and where access was agreed. The surveys were undertaken in accordance with the methodology agreed with the Environment Agency (as part of the EWG) and the results were reported in Volume 3, Annex 3.9: Water Vole Survey Technical Report (APP-083). The water vole survey methodology requires two visits within the breeding season (i.e. early season (between mid-April to June) and late season (between July and September)). The Applicants responded to comments regarding the weather conditions during the June 2023 water vole surveys in Table 3.5 of Volume 3, Chapter 3: Onshore Ecology (APP-075) and subsequent surveys were undertaken in 2024 where access was permitted. A summary of the surveys (as set in Table 3.15 of APP-075) found there was little confirmed evidence of water vole and (together with the infrequent but widespread evidence of mink) considered water vole to be of local importance within the survey area. However, a precautionary approach was adopted for the assessment which assumed that water voles to be present where potentially suitable habitat had been recorded. The Applicants confirm that water vole surveys were undertaken in late August, September 2024 and the first week of October 2024 (as weather conditions allowed the

Reference	Relevant Representation Comment	Applicants' response
		surveys to be recorded as a 'late season' survey). These surveys formed part of the late season surveys that were being completed in accordance with the seasonal survey restrictions and the methodology of the previous water vole surveys. Given the timing of the surveys, the results were not included in the DCO application. The Applicants confirm that Volume 3, Annex 3.9: Water Vole Survey Technical Report (APP-083) will be updated to show the location of these surveys and will be submitted at Deadline 1 of the DCO Examination. The Applicants confirm that no new evidence of water voles was recorded during the late August to early October surveys and therefore, the characterisation of the baseline and the conclusion of the assessment as reported in Volume 3, Chapter 3: Onshore Ecology (APP-075) remain unchanged. Preconstruction surveys for European Protected Species (including water vole) will be undertaken (as secured in Requirement 13 of Schedules 2A & 2B the draft DCO (AS-004)). As set out in the Outline Ecological Management Plan (OEMP) (APP-212) the water vole surveys will be undertaken along all ditches of potential value to water voles that would be affected during construction.
RR-0677 0677.13 (Appen. 1 APP-212)	**Outline Ecological Management Plan** **Section 1.6.4.28:** The recommendation for the discouragement or removal of water vole from the area fails to state that this should be undertaken under the relevant Natural England licence. Potential non-compliance with water vole legislation if a licence isn't obtained prior to disturbance. Re-word section to include the requirement to obtain a displacement licence before removing water vole from the area. In accordance with the mitigation hierarchy, the preferred mitigation would be to first Avoid any locations where water vole burrows are present **CoT128:** We support the commitment to undertake a hydrogeological risk assessment to inform the detailed design for installation of cables beneath the sand dunes.	**Section 1.6.4.28** The Applicants note that the need for an EPS licence and the type of licence required will be determined by the pre-construction surveys. The Applicants also confirm that the stage of construction will not commence until after the licence has been granted (as secured in Requirement 13 of Schedules 2A & 2B of the draft DCO (AS-004)), where potential unavoidable impacts to water vole are identified. The Applicants will apply the mitigation hierarchy prior to obtaining a displacement licence from Natural England, if a licence is deemed to be required. **CoT128:** The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to undertake a detailed hydrogeological risk assessment(s). This is currently secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). The Applicants would like to highlight that this commitment should be secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (AS-004). Under Requirement 8, the Environment Agency are listed as a consultee and therefore will be able to review the Hydrogeology Risk Assessment(s). An update to the Commitments Register (AS-030) will be submitted at Deadline 1.

Reference	Relevant Representation Comment	Applicants' response
	We request the opportunity to review the assessment once produced. This should be secured by Requirement. See Appendix 2. **CoT104:** We support the commitment for the Detailed Ecological Management Plan(s) to include details of mitigation measures for protected or notable species including otters and water voles. These should take into account updated survey results We request the opportunity to review the Detailed Ecological Management Plan through consultation under amended Requirement 12.	**CoT104:** In order to manage the potential impacts of construction of the Transmission Assets, the Applicants will apply the measures described in the Outline Ecological Management Plan (OEMP) (APP-212). The detailed EMP(s) are secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed EMP(s) will be implemented as approved by the relevant local planning authority. However, the Applicants note the Environment Agency's request to review the detailed Ecological Management Plan(s). The Applicants can confirm that they are engaging with the Environment Agency to discuss their concerns and will provide an update to the Examining Authority at Deadline 1.
RR-0677 0677.14 (Appen. 1 APP-216)	**Onshore Biodiversity Benefit Statement** **Section 1.5.2.8 & 1.5.3.13:** The EA support any plans to improve the condition of Dow Brook and the habitat creation at Lea Marsh Fields, particularly the creation of ditches. We request that we are consulted on any such proposals and Landscape Management Plan as they are developed through consultation under amended Requirement 6.	As outlined in RR-0677.5, the Applicants can confirm that they are engaging with the Environment Agency to discuss their concerns and will provide an update to the Examining Authority at Deadline 1. As noted in RR-0677.5, on the basis of the Applicants' commitment to a minimum of 8 m set back of all mitigation landscape planting within the onshore substation sites from Dow Brook, it is not considered necessary to amend the Requirement 6 (Provision of landscaping) to include the Environment Agency as consultee. Volume 1, Annex 5.3: Commitments register of the ES (AS-030) will be updated to include this new commitment at Deadline 1.
RR-0677 0677.15 (Appen. 1 APP-086)	**Otter survey technical report** Only 1 otter survey was completed in the area south of River Ribble, and otter evidence was found. Potential under-recording of this protected species resulting in inadequate mitigation. We support the proposals for further surveys in this area. We request consultation on the findings and any proposed	Otter surveys were undertaken between April 2023 and July 2024 on land parcels with habitat that could potentially support otter and where access was obtained. The surveys were undertaken in accordance with the agreed methodology agreed with the EWG and are reported in Volume 3, Annex 3.12: Otter Survey Technical Report (APP-086). The Applicants note that a full suite (four visits) of surveys were not completed on all watercourses. However, the Applicants consider that the baseline for otters within the survey area (as reported in Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075)) is robust.

Reference	Relevant Representation Comment	Applicants' response
	mitigation measures as incorporated into the Ecological Management Plan under amended Requirement 12.	Pre-construction surveys for European Protected Species (including otter) will be undertaken (as secured in Requirement 13 of Schedules 2A & 2B of the draft DCO (AS-004)). As set out in Table 1.2 of the Outline Ecological Management Plan (oEMP) (APP-212) up to four survey visits will be undertaken at approximately three-month intervals along watercourses of potential value to otters that would be affected during construction. The Applicants note the Environment Agency's request to be a consultee with regards to otter mitigation measures that will form part of the Ecological Management Plan (as secured under Requirement 12 of Schedules 2A & 2B of the draft DCO (AS-004)). Please refer to the Applicants' response to RR-0677.5 regarding this.
RR-0677 0677.16 (Appen. 1 APP-197)	**Outline Pollution Prevention Plan** **1.3.1 Relevant Guidance: The** Applicant should be aware that the Environment Agency PPG guidance referred to here was officially withdrawn in 2015. Although the content may still be relevant the applicant should ensure that current best practice is followed. Failure to consider and implement current best practice may result in increased environmental risk on site. Ensure detailed Pollution Prevention Plans refer to and implement any latest guidance. Ensure detailed Pollution Prevention Plans refer to relevant Environment Agency regulatory position statements which may provide relevant guidance regarding specific situations when the EA will not require a permit to carry out specific regulated activities. Environmental permits: regulatory position statements - GOV.UK	The Applicants note the withdrawal of the Environment Agency PPG guidance and confirm that only relevant measures within the PPG guidance have been used in the preparation of the Outline Pollution Prevention Plan (APP-197). The Applicants confirm that the detailed Pollution Prevention Plan(s) will make reference to Guidance for Pollution Prevention with regards to current environmental best practice and the Environment Agency's Regulatory Position Statements. The Pollution Prevention Plan(s) will form part of the CoCP(s). The Applicants have made a commitment (CoT04) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to prepare detailed Pollution Prevention Plan(s). CoT04 is secured in Requirement 8 of Schedules 2A and 2B to the draft DCO (AS-004). Detailed Pollution Prevention Plan(s) will be implemented by the Applicants as approved by the relevant planning authority in consultation with the relevant stakeholders, as appropriate.
RR-0677 0677.17 (Appen. 1 APP-195)	**Outline Dust Management Plan** **1.4.5.1 Dust suppression:** This section proposes using non-potable water for dust suppression but does not mention the potential need to apply for a water abstraction licence for this purpose.	The Applicants note that the need for abstraction licences for dust management will be confirmed during detailed design. The Applicants have made a commitment (CoT33) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to prepare detailed Dust Management Plan(s). CoT33 is secured in Requirement 8 of Schedules 2A and 2B to the draft DCO (AS-004). Detailed Dust Management Plan(s) will be implemented by the Applicants as approved by the relevant planning authority in consultation with the

Reference	Relevant Representation Comment	Applicants' response
	Failure to recognise the need for an abstraction licence can result in subsequent unnecessary delays to site construction activites. We note that Water Abstraction licence is referenced in APP-232 Consents and Licences Required Under Other Legislation. This should be cross-referenced in the Outline Dust Management Plan to highlight the potential requirement to obtain abstraction permit.	Environment Agency. The Applicants will obtain the abstraction licences as necessary to facilitate the relevant activities.
RR-0677 0677.18 (Appen. 1 APP-024)	**Project Description** **River Ribble Crossing 3.15.8.24 Pages 140-142:** This activity from our regulatory perspective is the largest and most significant civil engineering activity arising from the proposed development and is of primary interest to the Environment Agency in their Flood and Coastal Risk Management regulatory function. **Potential for flood risk and environmental impacts** Following DCO approval, we request detailed and ongoing consultation with the EA regarding the design and construction of works. This should be secured through amendments to the Outline Communications Plan.	The EA's interests and statutory functions are secured through the Protective Provisions in the DCO (Part 9 of Schedule 10 of the Draft DCO (AS-004)). See the Applicants' response to RR-0677.3 on amendments to the Outline Communications Plan and approvals secured through protective provisions.

Reference	Relevant Representation Comment	Applicants' response
	3.15.8.26 Page 140: The amount, duration and methodology for dewatering of the entry/exit pits and disposal of contaminated water is currently unknown. Potential for environmental and flood risk impacts. Following DCO approval, we request detailed and ongoing consultation with the EA regarding the design and construction of works. This should be secured through amendments to the Outline Communications Plan.	The Applicants note the points raised by the EA regarding dewatering at the entry and/or exit pits of trenchless crossing at the River Ribble and disposal of contaminated water. The Applicants have made a commitment (CoT41 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to undertake a hydrogeological risk assessment in relation to where the onshore export cable corridor or 400 kV grid connection cable corridor crosses sites of particular sensitivity (e.g. embanked Environment Agency surface watercourses such as the River Ribble). This is secured under Requirement 8 (CoCP), of Schedules 2A & 2B of the draft DCO (AS-004). The hydrogeological risk assessment will inform detailed design parameters of the crossing design including cable burial depth, dewatering and discharge requirements. Detailed CoCP(s) will be implemented by the Applicants as approved by the relevant planning authorities, in consultation with the relevant stakeholders, including the Environment Agency. In order to manage the potential risk of the discharge of any wastewater generated during dewatering to waterbodies, the Applicants have made a commitment (CoT04 in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to implement a detailed Pollution Prevention Plan(s). The detailed plan will be prepared in line with the Outline Pollution Prevention (APP-197), which forms part of the oCoCP (APP-193). The detailed CoCP(s) are secured by Requirement 8, of Schedules 2A & 2B of the draft DCO (AS-004). Detailed Pollution Prevention Plan(s) will be implemented by the Applicants as approved by the relevant planning authorities in consultation with relevant stakeholders including the Environment Agency. The Environment Agency's protective provisions in the DCO require that the EA be consulted and approve any plans and details of construction works as set out in Schedule 10 Part 9 of the Draft DCO (AS-004). See the Applicants' response to RR-0677.3 on ongoing consultation and amendments to the Outline Communications Plan and approvals secured through protective provisions..

Reference	Relevant Representation Comment	Applicants' response
	3.15.8.35 Page 143: The temporary access tracks and temporary works compounds associated with the proposed Ribble Crossing are inherently potentially high environmental risk Potential for environmental and flood risk impacts. Following DCO approval, we request detailed and ongoing consultation with the EA regarding the design and construction of works, to be secured through amendments to the Communication Plan. Section 1.3.1.1 of Outline Comms Plan states the intention to "Provide regular updates on construction activities through various communication channels, such as newsletters, media coverage, websites, and drop-in sessions." We request the following additional text "- Hold regular joint meetings with relevant stakeholders including but not limited to, Environment Agency and to provide updates on construction activities."	The assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.4 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). The assessment concluded that the Transmission Assets have a low to very low risk of flooding from all assessed sources and flood risk will not be increased as a result of the development. In addition, the Outline Surface Water and Groundwater Management Plan (APP-202), which forms part of the CoCP (APP-193) includes measures in relation to flood risk during the construction phase. The detailed Surface Water and Groundwater Management Plan will be agreed with the relevant planning authority in consultation with the EA. This is secured via Requirement 8 of Schedules 2A & 2B to the draft DCO (AS-004). The EA's protective provisions in the DCO require that the EA be consulted and approve any plans and details of construction works as set out in Schedule 10 Part 9 of the Draft DCO (AS-004). See the Applicants' response to RR-0677.3 on amendments to the Outline Communications Plan and consultation with the Environment Agency on detailed design. Thus, the current commitments to consultation and engagement with the Environment Agency are considered to be sufficient.
RR-0677 0677.19 (Appen. 1 APP-070)	**Hydrology and flood risk** **Glossary:** Within the glossaries there are terminology and definitions that we consider incorrect and unclear. We have previously highlighted these, and the main body of the report has been amended, however the Glossary has not been updated. **Page 10,14:** There remains the potential for confusion. Please ensure the Glossary is updated to reflect the changes made in the report. There is some confusion regarding the stand-off distances for HDD entry and exit points for fluvial and tidal watercourses.	**Glossary:** The Applicants note that terms and definitions within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) will be consistent with the glossary. This will be added to the errata sheet to be submitted into Examination at Deadline 1. **Page 10,14:** The Applicants note that the reference to 'Easement' within the glossary and on page 10 of Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) should be updated to 'stand-off'. This will be added to the errata sheet submitted into Examination at Deadline 1.

Reference	Relevant Representation Comment	Applicants' response
	Reference to the term 'easement' is misleading – the Environment Agency has access requirements, but these should not be referred to as 'easements'. Lack of clarity and potential risk of non-compliance with EPR. Applicant must be aware of the Environmental Permitting (England and Wales) Regulations 2016 The applicant should be aware that 16m is EPR regulatory distance consideration if the watercourse is a tidal waterbody. When referring to HDD entry and exit points, it should be clear that they will be located 16m away from tidally influenced main rivers. This lack of clarity is repeated on Page 14. There is also a specific error in relation to Dow Brook which is tidal south of Preston New Road. And a 16m offset should be applied. **Page 15 Row 3 column 2:** States:- 'Due to limitations in the Strategic Flood Risk Assessment data and of available Environment Agency data relating to fluvial flood risk of the Dow Brook, fluvial Flood Zone 3 is unable to be further divided into Flood Zone 3a and Flood Zone 3b.' Flood Zones 3a and 3b treated simply as FZ3, so unable to ensure development avoids FZ3b. The applicant should be aware of the forthcoming Fylde Coast Authorities Level 1 Strategic Flood Risk Assessment; and the forthcoming 2025 NaFRA2 datasets.	The Applicants confirm their understanding of the regulatory stand-off distances required for tidal waterbodies under the Environmental Permitting Regulations (EPR) (2016). The Applicants have made a commitment (CoT10) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) which states that trenchless techniques will be located 16 m from tidal Environment Agency Main Rivers, and 8m from non-tidal Environment Agency Main Rivers. CoT10 is secured in the draft DCO (AS-004) Schedule 2A and 2B Requirement 8 and DCO Schedule 10 Part 9. The Applicants confirm that these standoff distances have been correctly applied in the assessment presented in Volume 3, Chapter 2: Hydrology and Flood Risk of the ES (APP-070), however note that 'easements' has been incorrectly referenced rather than 'standoff' when referring to the HDD entry and exit points along the onshore export cable corridor and 400kV grid connection cable corridor. The Applicants note that Ordnance Survey mapping data (as set out Table 2.5 of Volume 3, Chapter 2: Hydrology and Flood Risk of the ES (APP-070)) demonstrates that the national tidal limit of Dow Brook is located to the south of Preston New Road. Flood defence data from the Environment Agency (also Table 2.5 of APP-070) indicates that an embankment prevents the watercourse from being tidally influenced upstream of this point. The Applicants note that the 1km study area for the Onshore Substations is located upstream of the national tidal limit, and therefore Dow Brook at this location is fluvial in nature. On this basis, the Applicants consider that they have applied the correct offset distance from the Onshore Substations to Dow Brook (page 14 of Volume 3, Chapter 2: Hydrology and Flood Risk of the ES (APP-070)). **Page 15 Row 3 column 2:** The Applicants note that the Environment Agency published data in January 2025 that included new surface water flood risk extents and depths. The Environment Agency published further data in March 2025 relating to Updated Flood Zones and River and Sea Flood Risk Extents (with and without defences). The Applicants note that the Fylde Coast Authorities Level 1 SFRA has also been published on the Fylde Borough Council website. The Applicants have undertaken a review of the Environment Agency and Fylde Coast Authorities data. The Applicants confirm that the conclusions of the assessment reported in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) remain unchanged and that no additional assessments or changes to the Application documents

Reference	Relevant Representation Comment	Applicants' response
	This new data will be available in due course and should be used to improve understanding of flood risk in this area and inform the detailed design. **Page 18 Row 2 column 2:** Text states 'the achievement of the environmental objectives of the water bodies within the WFD study area will not be compromised as a result of the project activities…' However, the Outline Operational Drainage Management Plan for the substations includes surface water drainage proposals for 2 concrete surface water outfalls discharging surface water at a combined rate of 46.5 l/s. Potential for lack of compliance with WFD. Concrete headwalls impact on watercourse modifications status and have WFD morphology impacts. The Water Framework Directive (WFD) study and other associated supporting documentation should be updated to consider permanent substation drainage proposal impacts. The design should be amended to mitigate any potential impact of WFD objectives. Avoid the use of end of pipe headwalls in watercourses, especially main rivers. Use swales and engineered inlet channels to reduce impacts of modification and of scour associated with point discharges. **Page 48 Row 3 column 4:** The minimum vertical clearances for service crossings below the bed of a main river are derived from Defra guidance. However, this is applicable on the basis that the service crossing does not pass through any bank, culvert, remote defence or river	are required. The Applicants confirm that the new flood risk data will be taken into account during the detailed design stage (i.e. the preparation of detailed Operational Drainage Management Plan(s)) as appropriate. **Page 18 Row 2 column 2:** The Dow Brook is classified as a Heavily Modified Water Body due to flood protection and urbanisation (as reported in Volume 3, Annex 2.1: Water Framework Directive Surface Water and Groundwater Assessment (APP-071)) and it has an objective of good ecological potential. The Outline Operational Drainage Management Plan (APP-215) refers to a headwall on the Dow Brook. The Applicants will actively engage with the Environment Agency on the design of the outfall in a meeting to be held on 24 April 2025 to ensure morphological impacts are minimised. The concrete outfall is an indicative design. Other options will be considered in line with the following guidance: CIRIA (2019) Culvert, Screen and Outfall Manual (C786) and CIRIA (2015) The SuDS Manual (C753F). These will be developed further at the detailed design stage of Transmission Assets. The Applicants have made a commitment (CoT11) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to prepare detailed Operational Drainage Management Plans(s) in accordance with the Outline Operational Drainage Management Plan and in line with the latest relevant drainage guidance notes in consultation with the Environment Agency and the Lead Local Flood Authority (Lancashire County Council). CoT11 is secured in Requirement 20 of Schedules 2A and 2B to the draft DCO (AS-004). **Page 48 Row 3 column 4** The Applicants have made a commitment (CoT10) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to maintaining a minimum 2 m vertical clearance below the hard bed of all Environment Agency Main Rivers, including the

Reference	Relevant Representation Comment	Applicants' response
	control works on the main river or through any sea defence. Flood defences may include sheet piling and clay cut offs. In addition, deep foundations may be encountered. Site-specific information and as-built survey records may need to be reviewed to inform suitable vertical clearances. There are likely to be circumstances where the stated minimum of 2 m vertical clearance may not be appropriate. Insufficient vertical clearance could result in damage to any assets. Additionally, in geomorphologically active situations, it could result in subsequent exposure of the crossing. Have additional regard where there are flood defence assets or where there is active change to channel geomorphology (both vertical and planform). Ensure the stated minimum vertical clearance is maintained for the lifetime of the development. This may mean locating transmission assets at a greater depth and setting the launch and reception pits further back. Include a requirement for detailed design for each trenchless crossing of designated main river to be agreed in consultation with the Environment Agency. **2.6.10.11 Page 77:** It was agreed between Applicant and EA that no bespoke hydraulic modelling was required for the FRA, given the relatively minor nature of the permanent works. However, the scope and extent of the temporary construction phase works are currently unknown. Potential for flood risk impacts from temporary works	landward toe of any associated flood defences. CoT10 is secured in the draft DCO (AS-004) Schedule 2A and 2B Requirement 8 and DCO Schedule 10, Part 9. The commitment also states that the final vertical clearance depths will be identified following the review of site-specific information during detail design stage in consultation with the Environment Agency. This will ensure that damage to assets is avoided and that assets will remain buried with minimum vertical clearance. **2.6.10.11 Page 77:** The Applicants welcome the agreement with the Environment Agency that no bespoke hydraulic modelling was required for the flood risk assessment (as reported in Volume 3, Annex 2.3: Flood Risk Assessment (AS-040, AS-042 and AS-044)) for the permanent works. The Applicants note that the scope and extent of the temporary above ground construction works are defined in Volume 1, Chapter 3: Project Description (AS-024) and the flood risk from these works has been assessed in accordance with the appropriate guidance (Volume 3, Annex 2.3: Flood Risk Assessment of the ES (APP-073 and APP-074)). The assessment (as presented in Volume 3, Chapter 2: Hydrology and Flood

Reference	Relevant Representation Comment	Applicants' response
	It should be recognised that temporary works may yet require bespoke hydraulic modelling post consent.	Risk) concluded that the effects of increased surface runoff during the construction phase on flood risk would not be significant. The Applicants note that maximum design scenario in the sequential construction scenario extends beyond the period assessed (i.e. 2032) in Volume 3, Annex 2.3: Flood Risk Assessment of the ES (APP-073 and APP-074)). As set out in its Rule 9 – ES assessment of Construction Scenarios (AS-070), the Applicants will provide a technical note (at Deadline 1) to clarify that flood risk effects from temporary construction works in the maximum design scenario. The Applicants consider that bespoke hydraulic modelling post consent will not be required for temporary construction works.
	Page 89: Commitment number CoT95 states that the principal contractors will sign up to the flood warning service to enable site personnel to be evacuated from the site in a timely manner prior to a flood event occurring. Evacuation of the site in response to all issued flood Alerts and Warnings could result in frequent and unnecessary disruption to site operations. The applicant should fully understand what the triggers for issuing alerts and warnings are. Flood Warning and Evacuation Plans (FWEP) and relevant actions need a considered approach on a site-by-site basis commensurate with the likelihood and consequences of any flooding.	**Page 89:** Section 1.6.9 of the Outline CoCP (APP-193) states that the Applicants will prepare flood warning and evacuation procedures. These procedures developed further will be prepared as part of the detailed CoCP(s) in consultation with the Environment Agency and will be agreed with the relevant planning authority, post-consent. The flood warning and evacuation procedures will be site-specific and may include measures set out in paragraph 1.7.2.4 of the Outline CoCP (APP-193) (e.g. scheduling work windows against tide times). The Applicants have made a commitment (CoT95) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to sign up to the Flood Warning service and that the flood warning will be applied to the Onshore Infrastructure Area located within Flood Zones 2 and 3 to enable site personnel to be excavated from the site where appropriate. CoT95 is secured via Requirement 8 of Schedules 2A & 2B to the draft DCO (AS-004). The detailed CoCP(s) will be implemented by the Applicants as approved by the relevant planning authority, in consultation with the relevant stakeholder, including the Environment Agency, where applicable.
RR-0677 0677.20 (Appen. 1 APP-)	**Flood risk assessment – Part 1 of 2** **General comment:** We have reviewed the FRA and we have no major concerns with the document. There are some minor details that we have picked up on that should be addressed by the applicant. **Page 32 Column 2:** Throughout the ES there is a failure to recognise the difference between fluvial and tidal	**Flood risk assessment – Part 1 of 2** **General comment:** The Applicants welcome the Environment Agency's feedback and have provided responses below. **Page 32:**

Reference	Relevant Representation Comment	Applicants' response
	watercourses as listed in Schedule 25 of the Environmental Permitting (England and Wales) Regulations 2016, Flood risk activities and excluded flood risk activities (EPR) There is also repeated reference to watercourse 'easements'. There is no reference in the current or previous regulations to 'easements', although the Environment Agency may stipulate and clarify any access requirements. Lack of understanding of the nuances of the EPR may have implications for future permitting requirements. The EPR clarifies the offset is 8 metres of a non-tidal main river (or within 8 metres of any flood defence structure or culvert on that river) or any activity within 16 metres of a tidal main river (or within 16 metres of any flood defence structure or culvert on that river). Do not refer to Environment Agency 'easements', as this terminology is not used in EPR. **Page 34:** The impact of the proposed surface water discharge rates from the substations to Dow Brook has not been assessed within the FRA. A combined discharge rate of 46.5l/s is not an inconsiderable amount of water to be discharging to this small watercourse. Without a proper assessment of the impact of the discharge rate of 46.5l/s, it could lead to the potential for flood risk to be increased elsewhere. The increased surface water discharge rate to Dow Brook should be assessed fully in the detailed design of the substations, in consultation with the EA under amended requirement 4.	The Applicants confirm their understanding of the difference between fluvial and tidal watercourses and refer to their response to RR 677.19 regarding the clarification in terminology and the offset to tidal EA Main Rivers. **Page 34**: The Applicants confirm that the proposed discharge rates assessed in the FRA (AS-040, AS-042 and AS-044) are based on information provided in the Outline Operational Drainage Management Plan (APP-215). The onshore substations are proposed to discharge surface water runoff from the site at a combined rate of 46.5l/s. This rate corresponds to the Qbar greenfield runoff rate. The Applicants have made a commitment (CoT11 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the onshore substations. These discharge rates will be achieved using measures set out in the detailed Operational Drainage Management Plans, which will be submitted to and approved by Lancashire County Council in consultation with the Environment Agency (as secured by Requirement 20 of Schedules 2A & 2B to the draft DCO (AS-004)). The

Reference	Relevant Representation Comment	Applicants' response
	1.4.4.4 and 1.4.4.5 Page 57: Refers to the Fylde Council SFRA (2011) as being relevant to the Morgan and Morecambe onshore substations. The applicant should be aware of the forthcoming Fylde Coast Authorities Level 1 SFRA, which is currently in draft and will include all forms of current and future flood risk, (including climate change) and indicative and modelled FZ3b. The applicant should also be aware of forthcoming revision to EA flood maps (NaFRA2) that may produce data that will supersede the updated SFRA. When published this information will supersede the SFRAs listed in 1.4.4.4. The applicant should be aware that the current and near future published data will significantly improve our understanding of flood risk in the study area. However, we are satisfied with the approach the applicant has made with the currently available data. **Page 112 1.6.4.3:** There is a potential risk that any ground level raising associated with the access tracks could impact on flood risk. Likewise, but not mentioned here, the activity of soil stripping and storage as linear bunds could divert floodwaters. Potential risk that temporary and permanent access tracks, and other temporary works, could result in increased flood risk elsewhere. The detailed design of these works should include a full assessment to ensure that the access tracks and soil stripping do not increase flood risk elsewhere.	detailed Operational Drainage Management Plans will be prepared substantially in accordance with the Outline Operational Drainage Management Plan (APP-215). **1.4.4.4 and 1.4.4.5 Page 57** The Applicants note that several Expert Working Group meetings were held during the drafting of the PEIR and ES and associated technical reports (including the Flood Risk Assessment) in May 2023, August 2023, November 2023). Information regarding updated SFRAs were requested within these meetings, and the Applicants confirm that the technical reporting in the FRA (AS-040, AS-042 and AS-044) was based on the most up to date information available. The Applicants note that the Environment Agency published updated flood data in January and March 2025. Please see the Applicants' s response to RR.0677.19. **Page 112 1.6.4.3:** The Applicants note that temporary and permanent access tracks are located within Flood Zone 1, 2 and 3 and have been assessed as part of Volume 3, Annex 2.3: Flood risk assessment of the ES (AS-040, AS-042 and AS-044). The Applicants have made a commitment (CoT85 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) which stated that temporary haul road(s) will be installed using permeable gravel aggregate with a geotextile or other type of protective matting, or plastic or metal plates or grating where required. CoT85 is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). The Applicants have also made a commitment (CoT09 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) which states that detailed CoCP(s) will be developed in accordance with the Outline CoCP. The Outline CoCP includes information

Reference	Relevant Representation Comment	Applicants' response
		about drainage during construction. CoT09 is secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (AS-004). Measures to control surface water runoff and flood risk will be implemented via the Outline Surface Water Groundwater Management Plan (APP-202). This includes the installation of interceptor drains where the haul road crosses watercourses or public highways. The detailed Surface Water and Groundwater Management Plan(s) will be agreed with the relevant planning authority in consultation with the Environment Agency, which is secured via Requirement 8 of Schedules 2A & 2B to the draft DCO (AS-004). With the implementation of these mitigation measures, the Applicants confirm that the effects of flood risk from increased surface water runoff will not be significant (as reported in Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070)).
RR-0677 0677.21 (Appen. 1 APP-074)	**Flood risk assessment – part 2 of 2** **CoT39 – Repair/reinstatement following any damage to assets:** To ensure compliance with this commitment the EA would request regular progress reports. Clarity is required on works areas that could impact on main river designations or proximity to main river and assets and what may or may not be covered by Protective Provisions. We understand that any impact on Environment Agency asset or 3rd party acting as a de facto flood defence asset will be rectified. We would recommend construction phase works should be the subject regular routine engagement with stakeholders including the EA. Section 1.3.1.1 of Outline Comms Plan states the intention to "Provide regular updates on construction activities through various communication channels, such as newsletters, media coverage, websites, and drop-in sessions."	The Applicants have made commitments (CoT02 and CoT10 in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) which states that trenchless techniques will be used to cross all Environment Agency Main Rivers; that a standoff distance of 8 m will be used from the bank of the EA Main Rivers or the landward toe of any flood defence; and that a minimum 2m vertical clearance will be maintained below the hard bed of all Environment Agency Main Rivers. CoT02 and CoT10 are secured in the draft DCO (AS-004) Schedule 2A and 2B Requirement 8 and DCO Schedule 10 Part 9. Final vertical clearance depths beneath EA Main Rivers will be identified during detailed design stage in consultation with the Environment Agency. The Applicants are committed to ongoing consultation with the Environment Agency through the detailed design stage. This is secured by the Environment Agency's protective provisions in Schedule 10 Part 9 of the draft DCO (AS-004) which provide detail as to where the EA must be consulted on plans and details of works carried out by the Applicants. The Applicants note the EA's suggested amendment to the wording of the Communications Plan however the Applicants consider the protective provisions framework will provide the appropriate mechanism for regular communication with the Environment Agency.

Reference	Relevant Representation Comment	Applicants' response
	Include in this section "- Hold regular joint meetings with relevant stakeholders including but not limited to, Environment Agency and to provide updates on construction activities."	
RR-0677 0677.22 (Appen. 1 APP-200)	**Soil Management Plan** **1.7.3.1 Soil storage:** There does not appear to be any information on surplus soil use or disposal that may arise from permanent works. Soil disposal and temporary soil storage should not impact on floodplain function and should not be land formed where it could divert or obstruct flood waters.	The Applicants note the Environment Agency's comments regarding soil disposal and temporary soil storage. As noted in section 3.15.5 of Volume 1, Chapter 3: Project description of the ES (AS-024), once the installation work is completed, the ground will be reinstated using stored subsoil and topsoil. In line with the final cut and fill levels to be prepared at detailed design, excavated materials will be used to create a level site for substation construction after foundation installation. Any suspected or confirmed contaminated soils will be appropriately separated, contained and tested before removal, if required in line with the Outline Soil Management Plan (APP-200) which is secured via Requirement 8 of Schedules 2A & 2B to the draft DCO (AS-004). Where export excess soil is required, any soil exported would be transported by a licensed waste carrier to an appropriate waste management facility as noted in the Outline Site Waste Management Plan (APP-199) which forms part of the Outline CoCP. This outlines the Transmission Assets waste management strategy in regard to topsoil and subsoil. This is secured in Requirement 8 of Schedules 2A & 2B of the draft DCO (AS-004). Temporary soil storage will be undertaken in accordance with the Outline Soil Management Plan (APP-200), which refers to recognised best practice guidance provided in the Institute of Quarrying (IQ) Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021) to mitigate the risk of flooding.
RR-0677 0677.23 (Appen. 1 APP-068)	**Geology, hydrogeology and ground conditions** **Table 1.14 Row 2 and Table 1.17 Row 2:** There is discrepancy between the two tables regarding what has been scoped in/out for this topic. The text, and the use of merged columns, is inconsistent between the two tables. Lack of clarity regarding what has been scoped in/out, and therefore lack of clarity regarding proposed mitigation measures.	**Table 1.14 Row 2 and Table 1.17 Row 2:** The Applicants confirm that the assessment in Volume 3, Annex 2.1: Water Framework Directive Surface Water and Groundwater Assessment (APP-071) considers groundwater bodies in the context of the Water Framework Directive and only screens groundwater bodies that are in continuity with locally important surface aquifers. However, the assessment in Volume 3, Chapter 1: Geology, Hydrogeology and Ground Conditions (APP-068) considers all groundwater bodies (including those groundwater bodies that are not connected to locally important surface aquifers). The Applicants confirm that this approach is in accordance with guidance and that no updates to the tables are required.

Reference	Relevant Representation Comment	Applicants' response
	Review and update Tables 1.14 & 1.17. Provide clarification regarding which tests have been scoped in and out, and provide justifications for these decisions. **Table 1.14 and Table 1.17 Row 2:** There is inconsistency between the conclusions made in (APP-071) and the reasoning provided in (APP-068). In App-071 the potential for saline intrusion is scoped out, stating that it was "not identified as a potential impact in Volume 3, Chapter 1" (APP 068). However, in APP-068 there is no specific consideration regarding saline intrusion, and the potential for saline intrusion is not explicitly ruled out. Lack of clarity regarding what potential impacts have been considered. Provide further justification as to why saline or other intrusion is not considered to be an impact. Especially in the light of potential sources of historical contamination given in V.3 Ch.1 **Commitments:** There isn't a commitment for a hydrogeological risk assessment for the dewatering that will be required for the entry/exit shafts associated with the River Ribble Crossing. Such a document will be mandatory for the eventual abstraction licence application and so the early production of one can be regarded as an opportunity. The dewatering in this location is likely to be the deepest and so will create potentially more risk. Include a requirement for a hydrogeological risk assessment associated with the River Ribble Crossing, which will be used to inform the dewatering activity and support subsequent environmental permitting requirements.	**Table 1.14 and Table 1.17 Row 2:** With regards to the potential for the saline intrusion of freshwater bodies through drilling, the Applicants note that freshwater may be encountered if lenses of groundwater form above the saline water where the dunes extend above MHWS. The Applicants have made a commitment (CoT119) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to undertake a hydrogeological risk assessment in relation to the crossing of Lytham St Annes Dunes SSSI. The assessment will be used to inform the detailed site - specific crossing design. The crossing design will consider potential impacts such as saline intrusion where appropriate. CoT119 is secured in the draft DCO (AS-004) Schedules 2A and 2B Requirement 8. **Commitments:** The Applicants have made a commitment (CoT41) in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to undertake hydrogeological risk assessment(s) to inform site-specific crossing method statements (where required) where the onshore export cable corridor or 400kV corridor crosses sites of particular sensitivity (e.g. River Ribble Crossing). CoT41 is secured in the draft DCO (AS-004) Schedule 2A and 2B Requirement 8. The hydrogeological risk assessment will consider the dewatering of entry/exit shafts associated with this crossing.

Reference	Relevant Representation Comment	Applicants' response
	1.11.5.6: It is not clear what the dewatering depth will be in the shaft locations for the Ribble Crossing. 13m is stated but the depths of the shafts are stated as 45m. The depth of dewatering is a crucial factor that assists in quantifying the risk of the activity to the water environment. The risk to the environment may be underestimated if the dewatering depth is greater than stated. Provide clarification in the risk assessment. **1.11.9:** The empirically-derived estimate indicates the zone of influence of dewatering will not extend to the margin of the SSSI. The report indicates that although dewatering impact risk is low, the installation of the cable duct could significantly impact the hydrogeology of the SSSI if installed within an impermeable zone, resulting in a high impact magnitude. The sensitive SSSI is connected to shallow groundwater and may be impacted by dewatering. Consider a physical investigation and test pumping to inform the zone of influence in this location. The proposed hydrogeological risk assessments for Lytham St Annes Dunes SSSI; and for St Annes Old Links Golf Course, to be carried out at detailed design stage, should be secured by Requirement.	**1.11.5.6:** The Applicants note that the dewatering depth in the shaft locations will be confirmed in the hydrogeological risk assessment for the River Ribble Crossing (as set out in CoT41 in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030). CoT41 is secured via Requirement 8 of Schedules 2A & 2B to the draft DCO (AS-004) and will therefore require consultation with the Environment Agency. The Environment Agency can therefore provide further input on this at detailed design stage. **1.11.9:** The potential impacts from the potential de-watering activities the Transition Joint Bays (TJB) (Works Nos. 10A/10B as shown within the Works Plans - Onshore and Offshore Part 1 of 2 (AS-017) is considered within Section 1.11.9 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068). The assessment concluded that there is the potential for a localised reduction in groundwater levels associated with the de-watering, in close proximity to the TJBs. However, it is considered that groundwater levels would be temporary and would recover after construction. This assessment of the maximum design scenario considered de-watering being undertaken by wellpoint. Paragraph 3.11.4.16, of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) outlines that a preliminary assessment of the impact of dewatering was undertaken using available borehole data. As stated above, this determined that the reduction in groundwater levels would be localised to the TJBs and therefore no changes in groundwater because of dewatering during construction of the Transmission Assets are anticipated within Lytham St Annes Dunes SSSI. The preliminary assessment assumed a precautionary zone of influence of 240 m from the trenchless technique entry pits (Works Nos. 10A/10B), which does not coincide with Lytham St Annes Dunes SSSI (located 600 m away) (see Paragraph 3.11.4.16 of APP-075 for further detail regarding how this was undertaken). On this basis, the assessment concluded that there would be

Reference	Relevant Representation Comment	Applicants' response
	Table 1.19 and section 1.11.9.13: There is inconsistency regarding the maximum depth of the direct pipe entry pits. 1.11.9.13 states 4m. Table 1.19 states 6m Lack of clarity Ensure consistency between these 2 statements and confirm the maximum entry pit depth. **1.11.12:** The impacts of heat on groundwater quality have been excluded from further consideration. This is considered premature given the outline provided in section 1.11.12.2. This could be a particular issue around the Lytham St Annes Dunes SSSI where the flora/fauna communities may have susceptibilities to ambient temperature changes. Provide further consideration at the detailed design stage when the ground conditions and the thermal characteristics of the cables are better understood. Only exclude when impacts are known not to be significant, or mitigation is available.	no adverse effect on Lytham St Annes Dunes SSSI because of dewatering during the construction phase of the Transmission Assets. The potential impacts of the Transmission Assets on Lytham St Annes Dunes SSSI, including on dune slack communities during the installation of offshore export cables below Lytham St Annes Dunes SSSI are considered in Section 3.11.4 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to undertake hydrogeological risk assessment(s) in relation to the crossing of the Lytham St Annes Dunes SSSI. These assessment(s) will be used to inform the detailed site-specific crossing design(s) for the installation of the offshore export cables beneath Lytham St Annes Dunes SSSI. This is secured by Requirement 12 of Schedules 2A & 2B of the draft development consent order (AS-004). Detailed EMP(s) will be implemented by the Applicants as approved by the relevant planning authorities. Taking the above information into account, including the commitment to undertake further hydrogeological assessment prior to the commencement of construction, it is considered the impacts of the Transmission Assets on Lytham St Annes Dunes SSSI, including dune slack communities as a consequence of dewatering have been sufficiently assessed within Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). **Table 1.19 and section 1.11.9.13** The Applicants note that the maximum direct pipe entry pipe has been incorrectly stated in Section 1.11.9.13 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions. The Applicants confirm that the maximum direct pipe entry pit depth is 6m. This will be added to the errata sheet submitted into Examination at Deadline 1. **1.11.12** Lytham St Annes Dunes SSSI will be crossed using trenchless techniques for which the exit pit will be situated 100 m seaward of the western boundary of Lytham St Annes Dunes SSSI (as set out in CoT44, secured by Requirement 8 of Schedules 2A & 2B, of the draft DCO (AS-004)) and the Works Plans (AS-014 and AS-015), and will also be included within the detailed CoCP(s) secured by Requirement 8 of Schedules 2A & 2B, of the draft DCO (AS-004)). The Applicants note that the typical burial depths of the trenchless technique will range from a minimum of 10 m up to a maximum depth of 30 m

Reference	Relevant Representation Comment	Applicants' response
	1.11.3.11: Construction of piled foundations could potentially create new migration pathways connecting surface contamination sources and the underlying bedrock Principal aquifer at depth. Reference to local BGS records indicates that sandstone bedrock has been encountered locally at a depth of 30.2m bgl (BGS borehole record SD436W61). In the absence of confirmation of proposed piling depth, there remains the risk that piling could create a preferential contaminant migration pathway into the principal aquifer, although it is acknowledged that the proposed substation sites are unlikely to be impacted by significant existing contamination. Potential for contaminants to reach the underlying sandstone bedrock aquifer. Foundation Works Risk Assessment should be secured by Requirement for the substations and any other piled structures to be constructed onshore.	below the surface between MHWS and the TJBs located at Blackpool Airport (as stated in Table 3.13 of Volume 1: Chapter 3: Project Description AS-024). As set out in paragraph 3.15.2.8 of Volume 1, Chapter 2: Project description (AS-024), the cables will be suitably spaced out in order to minimise the mutual heating effect of one cable circuit on another and allow for heat dissipation. This consideration is required for the design, to ensure efficient transmission across the electrical system. In addition, the onshore export cables themselves will consist of copper or aluminium conductors wrapped with various materials for insulation, protection, and sealing to reduce heat dissipation (paragraph 3.15.2.7 of AS-024) **1.11.3.11** Further to RR-677.4 above, the Applicants have made a commitment (CoT103) in in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to undertake a piling risk assessment where piling is proposed in areas of potential contamination. Consultation with the Environment Agency will be sought. CoT103 is secured in Requirement 8 of Schedules 2A & 2B of the the draft DCO (AS-004).
RR-0677 0677.24 (Appen. 1 APP-005)	**Draft Development Consent Order** **Schedule 10 Protective Provisions Part 9 2. (4)** Typographical error Lack of clarity regarding Agency's response to submission of plans Amend text to read: "The Agency must respond to the submission of any plans before the expiration of 2 months	The Applicants note this relevant response and confirm this will be reflected in the Environment Agency protective provisions which will be updated within the draft DCO once agreed with the Environment Agency.

Reference	Relevant Representation Comment	Applicants' response
	of the submission of the plans or such other time period as is agreed between the parties.	
RR-0677 0677.25 (Appen. 2.1)	**Appendix 2 – Suggested text for additional Requirements** **1. Additional Requirement: Hydrogeological Risk Assessment (HyRA)** No Horizontal Direct Drilling (HDD) or any other trenchless utility installation methods forming part of the authorised development shall commence until a Hydrogeological Risk Assessment (HyRA) report that addresses the risks to the groundwater resources that may be impacted has been submitted to and approved in writing by the relevant local planning authority in consultation with the Environment Agency. The report must include details of 1. The pre-construction baseline conditions of all features identified during a comprehensive water features survey of the area to be subject to trenchless utility installation; 2. A hydrogeological model for the area that has been identified as being affected by the trenchless utility installation; 3. Suitable monitoring locations and parameters to be used for the duration of the proposed trenchless utility installation and will serve as monitoring points for the verification of successful implementation; and 4. A dewatering management plan containing a groundwater monitoring programme that must be implemented to ensure the continued safeguards of any abstractions identified by the water features survey. The authorised development must be carried out in accordance with the approved dewatering management plan as informed by the HyRA.	See the Applicants' response to RR-0677.4 on the suggested additional requirement for hydrogeological risk assessments. Based on the response to RR-0677.4, the Applicants do not consider that the proposed additional requirement is necessary. As per CoT128, CoT119 and CoT41 in Volume 1, Annex 5.3: Commitments Register of the ES (AS-030), the hydrogeological risk assessment(s) at detailed design would be informed by desk-based review as well as ground investigation information where necessary which would provide information on pre-construction baseline of dependent water features and the hydrogeological model for the area. Any monitoring requirements (groundwater and surface water monitoring) will be identified as a result of the hydrogeological risk assessment(s) and will be agreed in consultation with the Environment Agency and other relevant stakeholders prior to construction. In addition, to manage the potential risk of dewatering on existing groundwater abstractions, measures set out in a detailed Surface Water and Groundwater Monitoring Plan will be implement in line with the Outline Surface Water Groundwater Management Plan (APP-202), which forms part of the Outline CoCP (secured under Requirement 8 of Schedules 2A and Schedule 2B of the draft DCO (AS-004)). The detailed plan will be approved by the relevant planning authorities in consultation with relevant stakeholders including the Environment Agency.

Reference	Relevant Representation Comment	Applicants' response
RR-0677 0677.26 (Appen. 2.2)	**Appendix 2 – Suggested text for additional Requirements** **2. Additional Requirement: Foundation Works Risk Assessment** No part of the authorised development is to commence until a Foundation Works Risk Assessment (FWRA) for any onshore piled foundations has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency. The FWRA must include: i. Options for the proposed piling method at each location where piling is proposed; ii. For each piling method option at each location, mitigation measures to minimise detrimental impact on underlying groundwater resources. The authorised development must be carried out in accordance with the approved method statements and, where relevant, the approved risk assessment.	See the Applicants' response to RR-0677.4 on the suggested additional requirement for Foundation Risk Assessment. Based on the response to RR-0677.4, the Applicants do not consider that the proposed additional requirement is necessary.
RR-0677 0677.27 (Appen. 2.3)	**Appendix 2 – Suggested text for additional Requirements** **3. Additional Requirement: Consultation with the Environment Agency on detail design** Construction works relating to all trenchless crossing of designated main rivers, (including any interaction with Environment Agency flood defences) as identified in the Onshore Crossing Schedule, must not commence until the detailed design, vertical clearance depth and an associated work programme for the construction phase has been submitted to and approved by the relevant Local Authority in consultation with the Environment Agency.	See the Applicants' response to RR-0677.3 on the suggested additional requirement for consultation on detailed design. In addition, the Applicants have made a commitment (CoT10 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that the final vertical clearance depths beneath Environment Agency Main Rivers will be identified following the review of site-specific information during detail design stage in consultation with the Environment Agency. This is secured by Requirement 8 of Schedules 2A & 2B of the draft DCO (AS-004). On this basis, the Applicants do not consider the proposed additional requirement is necessary.

Reference	Relevant Representation Comment	Applicants' response
RR-0677 0677.28 (Appen. 3)	**Flood Risk Activity Permits (FRAPs)** It is noted the intention of the developer to disapply a number of FRAPs and include them as protective provisions. Please note the works associated with this project will require detailed project design and the Environment Agency requests early involvement in the development of these where they relate to our remit. Specific areas of concern are: • The flood risk associated with the above ground aspects of the temporary construction phase ie construction compounds, temporary fencing, hoarding, temporary access roads, soil storage, and management and disposal of surface water and dewatering activities. • The design of the transmission assets crossings for the intertidal area, the sand dunes, and main river watercourses. Including the above and below-ground temporary works, and interaction with EA flood defence assets • The above ground permanent works and the Morgan and Morecambe substations.	See the Applicants response to RR-0677.3 on the disapplication of FRAPS.
RR-0677 0677.29 (Appen. 4)	**Appendix 4: Work Package Tracker**	This is noted by the Applicants.