

# Outer Dowsing Offshore Wind

## Pre-examination Principal Issues Progress Tracker

Procedural Deadline 19 September

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# 1 Introduction and Document Purpose

## 1.1 Introduction

1. The Rule 6 Letter (PD-009) was published by the Examining Authority on the 4<sup>th</sup> of September 2024.
2. This Pre-Examination Principal Issues Progress Tracker has been prepared to support the application by GT R4 Limited trading as Outer Dowsing Offshore Wind (the ‘Applicant’) for development consent to construct, operate and decommission the proposed Outer Dowsing Offshore Wind Farm (the Project).

## 1.2 Document Purpose

3. This document has been produced in response to the Examining Authority’s Rule 6 letter (PD-009) requesting a Pre-examination Progress Tracker, reporting on what the Applicant considers are the principal, and other notable, issues in the Examination.
4. The Examining Authority provided headings following their initial assessment of the application documents, which detail the Examining Authority (ExA)’s view of Principal Issues. The Applicant has further detailed throughout the tables in this document what the Applicant believes the Principal Issues under each of these heading are, and the perceived likelihood of resolution.
5. As outlined in the Rule 6 Letter (PD-009) the Applicant has been requested to submit a ‘Mid-Examination’ Progress Tracker, expected to be submitted at Deadline 3 in accordance with the draft Examination Timetable, and Closing Statements to be submitted at the final deadline.

## 1.3 Document Structure and Outline

6. Section 1.5 Pre-Examination Principal Issues Progress Trackers contains tables that set out what the Applicant believes the principal issues are grouped by topic, as set out in Annex C of the Examining Authority’s Rule 6 letter (PD-009), logs the Interested Parties that have raised them and summarises both the Interested Parties’ and the Applicant’s positions, alongside the likelihood of resolving the issue. Section 1.4 Planned Engagement Processes to Progress Issues, below outline the steps the Applicant plans to use to progress positions and seek alignment with Interested Parties where possible and the anticipated timelines for that.
7. For ease of reference, and in accordance with the ExA’s suggestion in the Rule 6 letter (PD-009) the tables use a colour-coding “RAGG” colour system to guide the reader to the likelihood of resolving the issues as follows:

Colour	Likelihood of Resolution
Red	The Interested Party / Parties and the Applicant are unable to align their positions.
Amber	The Interested Party / Parties and the Applicant are in discussions to discern whether positions can be aligned
Green	The Interested Party / Parties’ and the Applicant’s positions are aligned.
Light Green	The Applicant has responded to the Interested Party/Parties comments within submissions made at this deadline, and believes this matter will be resolved pending confirmation from the Interested Parties.
Grey	The Interested Party / Parties and the Applicant’s positions are not aligned, however the matter is considered immaterial.

## 1.4 Planned Engagement Processes to Progress Issues

8. The Applicant considers that the majority of the principal issues outlined in this document can be resolved through collaborative engagement with parties. An outline of proposed engagement and timelines to seek resolution with parties is provided below:
  - Responding in detail to Relevant Representations (document reference 15.3, submitted as part of this suite of documents). Further comment or information may be requested by some parties, which the Applicant will provide where required, to progress positions,
  - Responding to Written Representations at Deadline 3 to clarify positions, progress and provide additional information as needed in order to seek resolution,
  - Where Statements of Common Ground (SoCGs) are being undertaken, the Applicant will work with parties, per their availability, to progress positions and agree further areas of common ground, providing updates on this process through Deadlines 1-5, where possible noting not all parties may be in a position to provide updates at each deadline,
  - Where Principal Areas of Disagreement Statements (PADSs) are being undertaken and parties drafting them are open to collaborative working, the Applicant will seek to engage with parties to progress positions and resolve areas of disagreement in advance of Deadline 6, when final PADSs will be submitted by parties,
  - Meetings and written bilateral engagement.
9. The Applicant will continue to work with interested parties to resolve issues, with the timings of meetings, written communications, provision of documents or information for review etc. to be agreed with the parties, as needed, in order to progress positions to an area of agreement. Flexibility on timelines may be required for some parties to fully and effectively engage, so that their principal issues can be fully understood and where appropriate addressed and resolved by the Applicant.

## 1.5 Pre-Examination Principal Issues Progress Trackers

### 1.1.1. Benthic Ecology, Intertidal, Subtidal and Coastal Effects

Table 1.1: Benthic Ecology, Intertidal, Subtidal and Coastal Effects

Interested Party	Principal Issues	Progress
Natural England (RR-045)	Cable protection within the nearshore area	<p>The Applicant has responded to comments relating to Natural England’s advice around avoiding near shore cable protection and avoiding sediment transportation. within the Applicant’s Response to Relevant Representations (document reference 15.3).</p> <p>The Applicant has provided further clarity on techniques used within the nearshore.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that both the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Mitigation proposed for potential benthic impacts	<p>The Applicant has provided additional clarification regarding comments about whether mitigation had been considered for potential benthic impacts, including on priority habitats, in the Applicant’s Response to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek</p>

Interested Party	Principal Issues	Progress
		<p>further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
<p>Natural England (RR-045)</p>	<p>Conclusions of Annex 1 Reef extent.</p>	<p>The Applicant has responded to comments in respect of the conclusions of the Annex 1 reef extent within the Applicant’s Relevant Representations (document reference 15.3). Additionally, the Applicant has submitted an Envision Sabellaria spinulosa reanalysis and report (document reference 15.13) at the Procedural Deadline.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
<p>Natural England (RR-045)</p>	<p>Cable protection within the IDRBNR SAC on the sandbank features.</p>	<p>The Applicant has responded to comments about the proposed cable protection within The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with Natural England to provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4, using timeframes and</p>



Interested Party	Principal Issues	Progress
		mechanisms that the Applicant and Natural England agree are appropriate for effective and collaborative engagement.
Natural England (RR-045)	Cable protection measures in the nearshore zone.	<p>The Applicant has responded to comments about the use of cable protection within the nearshore within The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with Natural England to provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective and collaborative engagement.</p>
Natural England (RR-045)	Compliance with the Export Cable Region Assessments that inform the AfL	<p>The Applicant has responded to comments on the interface between the project-level assessments and the AfL within The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with Natural England to provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4, using timeframes and</p>

Interested Party	Principal Issues	Progress
		mechanisms that the Applicant and Natural England agree are appropriate for effective and collaborative engagement.

### 1.1.2. Civil and Military Aviation and Communication

Table 1.2: Civil and Military Aviation and Communication

Interested Party	Principal Issues	Progress
NATS En-Route Ltd (RR-044)	Potential interference on systems and Radar.	The Applicant has responded to comments about potential interference of the Project on systems and radar within The Applicant’s Responses to Relevant Representations (document reference 15.3).
Defence Infrastructure Organisation (RR-016)		<p>The Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with NATS and the MOD to provide clarity where needed.</p> <p>The Applicant’s will continue to engage with Interested Parties following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and the Interested Parties agree are appropriate for effective and collaborative engagement.</p>

Table 1.3: Commercial Fisheries and Fishing

Interested Party	Principal Issues	Progress
	No issues raised	

**1.1.3. Cumulative Effects**

Table 1.4: Cumulative Effects

Interested Party	Principal Issues	Progress
MMO (RR-042)	How the cumulative assessment approach has been undertaken, with regards to underwater noise impacts on fish receptors.	<p>The Applicant has responded to comments about underwater noise impacts within The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>The Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with the MMO to provide clarity where needed.</p> <p>The Applicant will continue to engage following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and the MMO agree are appropriate for effective and collaborative engagement.</p>
LCC (RR-004)	Cumulative effects - LVIA	<p>The Applicant has responded to all queries in relation to this topic through their Responses to Relevant Representation (document reference 15.3).</p> <p>The Applicant has confirmed that the additional cumulative landscape and visual effects resulting from the contribution of the project to the overall cumulative effect will be very limited, as assessed in the LVIA.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>
Lincolnshire County Council (RR-004)	Cumulative effects – Traffic	The Applicant has responded to comments on cumulative effects of traffic within the Applicant’s Responses to Relevant Representations (document

Interested Party	Principal Issues	Progress
		reference 15.3). The Applicant has confirmed that they will continue to monitor the development and availability of environmental, spatial and temporal project information for other projects in the region to foster collaboration, noting it will be the responsibility of future projects that come forward for planning to undertake their own Cumulative Effects Assessment as per the guidance in Advice Note 17. The Applicant is actively engaging with LCC regarding how the Applicant might evaluate new information from these emerging projects throughout the examination phase.

#### 1.1.4. Fish and Shellfish Ecology

Table 1.5: Fish and Shellfish Ecology

Interested Party	Principal Issues	Progress
MMO (RR-042)	Potential impact to herring spawning grounds and the impact assessment methodology, specifically noise thresholds, and conclusions.	<p>The Applicant has responded to comments about potential impacts on herring spawning grounds and the methodology and conclusions in The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>The MMO may wish to seek further clarification once it has had the opportunity to review the information provided to date. The Applicant will endeavour to work with the MMO to provide clarity where needed.</p> <p>The Applicant will continue to engage with the MMO following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and the MMO agree are appropriate for effective and collaborative engagement.</p>

Interested Party	Principal Issues	Progress
MMO	The robustness of the shellfish baseline characterisation, specifically the datasets.	<p>The Applicant has responded to comments about robustness of the baseline characterisation in The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>The MMO may wish to seek further clarification once it has had the opportunity to review the information provided to date. The Applicant will endeavour to work with the MMO to provide clarity where needed.</p> <p>The Applicant will continue to engage with the MMO following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and the MMO agree are appropriate for effective and collaborative engagement</p>

**1.1.5. Habitats and Onshore Ecology, including Onshore Ornithology**

Table 1.6: Habitats and Onshore Ecology, including Onshore Ornithology

Interested Party	Principal Issues	Progress
Natural England (RR-045)	Highlighted the need to review draft protected species licences as part of the consenting process in order to issue a Letter of No Impediment (LoNI).	<p>The Applicant believes this issue has now been resolved.</p> <p>The Applicant has engaged with the Natural England Wildlife Licensing Service (NEWLS) via the Pre-Submission Screening Service and recognises the need for a Letter of No Impediment.</p> <p>In order to obtain LoNIs, the Applicant has submitted full draft licence applications in respect of great crested newt and water vole to Natural England with the aim of obtaining LoNIs prior to the examination.</p>

Interested Party	Principal Issues	Progress
		<p>A protected species licence is not anticipated to be required for bats, badger and otter although this position will be reviewed again using data collected during pre-commencement/ pre-construction surveys.</p> <p>If further concerns are raised the applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>
Natural England (RR-045)	Effect of HDD on landfall location at Anderby Creek, just North of Wolla Bank SSSI	<p>The Applicant has responded to comments on the effect of HDD on the proposed landfall location in The Applicant’s Responses to Relevant Representations (document reference 15.3). In particular, the Applicant has undertaken pre-construction ground investigations in July 2024 to avoid unforeseen direct or indirect impacts on Chapel Point to Wolla Bank SSSI. Further details on Frac -Out management are included in Section 2.3 of the Outline CoCP (8.1).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with Natural England to provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective and collaborative engagement.</p>
Natural England (RR-045)	Effect on Sea Bank Clay Pits SSSI	<p>An updated version of the OCoCP (document 8.1 (Version 2)) has been submitted with this response securing construction stage water monitoring through committing to a pre-construction ‘Water Quality Monitoring and Mitigation Plan’ that would describe the regime for pre-construction and construction monitoring of private water supplies and other locations (including Sea Bank Clay Pits SSSI).</p> <p>This also details mitigation measures in the event of any impacts being identified during construction. The draft DCO has been updated (3.1 Draft Development</p>

Interested Party	Principal Issues	Progress
		<p>Consent Order (Version 3)) to secure that a Water Quality Monitoring and Mitigation Plan forms a part of the Code of Construction Practice to be submitted for approval pursuant to DCO Requirement 18.</p> <p>The Applicant believes that this update resolves this issue. If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>

### 1.1.6. Habitats Regulations Assessment

Table 1.7: Habitats Regulations Assessment

Interested Party	Principal Issues	Progress
Natural England (RR-045)	The conclusion of no AEoI to the conservation objectives of the Annex 1 sandbank feature of the IDRBNR SAC, in relation to changes in physical processes impacts.	<p>The Applicant has responded to comments regarding the conclusion of no AEoI for Annex 1 sandbank features to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	The conclusion of no AEoI to the conservation objectives of the Annex	The Applicant has responded to comments regarding the conclusion of no AEoI for Annex 1 reef features to Relevant Representations (document reference 15.3).

Interested Party	Principal Issues	Progress
	1 reef of the IDRBNR SAC and the determination of reef.	<p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Compensation package proposed for the adverse effect on Kittiwake.	<p>The Applicant has responded to comments regarding the proposed compensation package for Kittiwake in Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England(RR-045)	The ‘without prejudice’ compensation packages for Guillemot and Razorbill.	The Applicant has responded to comments regarding the proposed ‘without prejudice’ compensation packages in Relevant Representations (document reference 15.3).



Interested Party	Principal Issues	Progress
		<p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Conclusion of no AEoI on Guillemot and Razorbill	<p>The Applicant has responded to comments regarding the conclusion of no AEoI for Guillemot and Razorbill Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Proposed compensation package deliverability	<p>The Applicant has responded to comments about the proposed compensation package deliverability within The Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date. The Applicant will endeavour to work with Natural England to provide clarity where needed.</p>

Interested Party	Principal Issues	Progress
		<p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4, using timeframes and mechanisms that the Applicant and IP agree are appropriate for effective and collaborative engagement.</p>
Natural England (RR-045)	Southern North Sea SAC: effectiveness of the Site Integrity Plan process	<p>The Applicant has responded to comments in respect of the approach taken to the Site Integrity Plan within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant considers there is no requirement for NAS due to the conclusion of no AEoI. Detailed measures are included in the outline SIP (APP-281), that may be included in the final SIP which will be finalised post consent. The outline SIP follows current guidance and thresholds (JNCC 2020).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	HRA - Apportioning of auks to FFC SPA	<p>The Applicant has responded to comments raised in respect of the approach taken to the apportionment of auks to FFC SPA within the Applicant’s Response to Relevant Representations (document reference 15.3).</p> <p>There are disagreements on the appropriate apportioning rates for guillemot to the FFC SPA within the breeding season. Considering the peak abundance is</p>

Interested Party	Principal Issues	Progress
		<p>in April, prior to the core breeding season, the Applicant does not consider it appropriate to assume that all guillemots within the array originate from FFC SPA during this time.</p> <p>Conditions in April are less restrictive compared to the incubation and chick-rearing periods, from which mean maximum foraging ranges are derived, therefore these foraging ranges shouldn't be used to determine connectivity in April. From a review of peer-reviewed literature the Applicant considers an apportionment of 50% to be appropriate for the peak abundances during April. It should be noted that the abundance of guillemot during the core breeding months is roughly half that of April, and therefore the applicants approach assumes that all birds within the array during the core breeding season originate from FFC SPA.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	HRA - Apportioning of adult birds	<p>The Applicant has responded to comments raised in respect of the approach taken to apportionment of adult birds within the Applicant's Response to Relevant Representations (document reference 15.3).</p> <p>Natural England have asked for adult birds to be apportioned using site specific data.</p>

Interested Party	Principal Issues	Progress
		<p>Although the Applicant does not consider the approach to be accurate, they have agreed to use site-specific age proportions for adult-like birds where this data is available, robust and in large enough sample sizes. This includes gannet, kittiwake and lesser black-backed gull.</p> <p>Where this data is not available Natural England advise that 100% of birds in the survey area are assumed to be adult birds. The Applicant does not agree with this approach because there is no evidence to support this assumption. The Applicant has used scientific literature and robust estimates of demographic rates to model the stable age distribution of the population to estimate the proportion of adults in the population and applied that to the survey area. The Applicant believes this is appropriate because the array is not in close proximity to colonies (i.e. within mean foraging range for auks) and therefore the proportion of adults is unlikely to be inflated compared to the general population.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Without prejudice Guillemot and razorbill compensation measures	The Applicant has Responded to Relevant Representations (document reference 15.3). Compensation calculation methodologies have not been agreed with Natural England. Given the complexity of the measures (acting on both survival and productivity) it is likely that the compensation benefits will

Interested Party	Principal Issues	Progress
		<p>be calculated/estimated on a site-by-site basis. Full details of the potential benefits of the measures will be provided into the examination at a future deadline for Natural England to comment on.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>Progress will be sought following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Impacts on and proposed compensation requirements for kittiwake (FFC SPA)	<p>The Applicant has Responded to Relevant Representations (document reference 15.3).</p> <p>The Applicant has provided updated assessment values for kittiwake within the Environmental Report for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (document reference 15.9) and the Habitats Regulations Assessment for the Offshore Restricted Build Area and Revision to the Offshore Export Cable Corridor (document reference 15.10).</p> <p>Natural England’s position is that the Hornsea Three Part 2 method for calculating the compensation quantum is the most appropriate. The Applicant disagrees with several aspects of this calculation method and proposes using the Hornsea Four calculation method.</p> <p>Both approaches have been provided in the compensation documents and will be updated to reflect the outcomes of the HRA ORBA assessment (Document reference 15.10).</p>

Interested Party	Principal Issues	Progress
		<p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>Progress will be sought following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Lack of full two years of baseline data with regards to distribution patterns and abundance of passage and wintering bird species, including suitability of the proposed mitigations measures to qualifying features of the Wash SPA and Ramsar using functionally linked land (FLL).	<p>The Applicant believes this issue has now been resolved through the submission of the Winter Bird Survey Addendum (AS1-108) which documents the methods and results from the second season of wintering and passage bird surveys, covering the period from September 2023 to April 2024 and was submitted by the Applicant in July 2024 in response to Section 51 Advice.</p> <p>If further concerns are raised the Applicant will engage with Natural England in accordance with the process outlined in section 1.4 of this document to seek resolution.</p>
Natural England (RR-045)	Lack of detailed analyses of cropping patterns and land use within the Order Limits and therefore conclusions for project impact to qualifying features of protected sites, which are reliant on the availability of alternative FLL and preferred foraging habitats within their foraging range.	The Applicant has responded to comments raised about the proposed mitigation regarding potential impacts to FLL in their Response to Relevant Representations (document reference 15.3). Further details have also been provided for the study of crop types and are documented in a clarification note (15.11 Additional clarifications relating to Natural England’s Relevant Representations (Appendix I Onshore Ornithology)). This provides further evidence that the crop types utilised by the key qualifying features are common within the survey area. The Applicant’s responses to Natural England’s Relevant Representations in relation to Ornithology and FLL alongside document 15.11 was provided to Natural England in August 2024 for early sight.

Interested Party	Principal Issues	Progress
		<p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>

### 1.1.7. Historic Environment and Marine Archaeology

Table 1.8: Historic Environment and Marine Archaeology

Interested Party	Principal Issues	Progress
LCC(RR-004)	Trial trenching of blank areas	<p>The Applicant believes this issue has now been resolved through the Applicant's Responses to Relevant Representations (document reference 15.3), submitted as part of this suite of documents.</p> <p>The Applicant has confirmed that blank areas are currently being evaluated by intrusive works being undertaken by AOC Archaeology and that further blank areas will be targeted through preconstruction trial trenching according to a proportionate strategy responsive to the depositional environment of the Order Limits and archaeological potential. Direct reference to these works has been included in the updated Outline Written Scheme of Investigation (OWSI) (Onshore) (document 8.9, Version 2).</p> <p>If further concerns are raised the applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>

Interested Party	Principal Issues	Progress
LCC(RR-004) HE (RR-027)	Level of pre-consent trial trenching	<p>The Applicant has responded to comments relating to the level of pre-consent trial trenching within the Applicant’s Responses to Relevant Representations (document reference 15.3) and does not consider it necessary to undertake further pre-consent trial trenching.</p> <p>The Applicant has confirmed that trial trenching is underway, and that further trial trenching will be undertaken preconstruction. The results of trial trenching will inform refinement of the identified mitigation strategy in accordance with the OWSI (document 8.9, Version 2). The OWSI (document 8.9, Version 2) includes measures to mitigate through preservation in situ.</p> <p>The Applicant acknowledges that the pre-construction archaeological works will need to inform the WSIs to be submitted for each stage of the onshore transmission works. As such, requirement 17(1) of the draft DCO (document 3.1, Version 3) has been updated to include the underlined text:</p> <p>“No stage of the onshore transmission works may commence until a written scheme of archaeological investigation (which must accord with the outline onshore written scheme of investigation for archaeological works <u>and is informed by the archaeological investigations referred to in sub-paragraph (2))</u> for that stage has been submitted to and approved by Lincolnshire County Council in consultation with the relevant planning authority and Historic England.”</p> <p>If further concerns are raised the Applicant will continue to engage with Interested Parties in accordance with the process outlined in section 1.4 of this document to seek resolution.</p>



Interested Party	Principal Issues	Progress
LCC (RR-004)	Coverage of Air Photo Analysis	<p>The Applicant has responded to comments raised regarding air photo analysis in the Applicant’s Responses to Relevant Representations (document reference 15.3).</p> <p>The Applicant undertook sample area testing to determine the usefulness of aerial photographic assessment alongside the results of geophysical survey. It was determined that full aerial photographic assessment is not necessary; the sample testing did not record any cropmarks indicating the presence of archaeological remains not already identified through LiDAR or geophysical survey.</p> <p>LCC may wish to seek further clarification once they have had the opportunity to review the responses to relevant representations as well as the data received from the ongoing trial trenching campaign, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with LCC following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and LCC agree are appropriate for effective engagement.</p>
LCC (RR-004)	Consideration of non-designated heritage assets	<p>The Applicant believes this issue has now been resolved through the Applicant’s Responses to Relevant Representations (document reference 15.3), submitted as part of this suite of documents.</p> <p>The current assessment of non-designated farmsteads is considered proportionate and sufficient to identify the significance of effect to these assets.</p>

Interested Party	Principal Issues	Progress
		If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.

**1.1.8. Land Use, Geology and Ground Conditions**

Table 1.9: Land Use, Geology and Ground Conditions

Interested Parties	Principal Issues	Progress
LCC (RR-004_ Natural England (RR-045) Landowners	Impacts on BMV land	<p>The Applicant has responded to comments on BMV land within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant has provided clarification on the approach to site selection in relation to BMV land and the approach to ALC soil surveys.</p> <p>Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Interested Parties agree are appropriate for effective engagement.</p>
LCC (RR-004) Landowners	Soil Management Plan	The Applicant has responded to comments on the Soil Management Plan within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant has provided clarification on the content of the Outline SMP, providing confirmation that measures will be defined in further detail in the Final SMP, based on the results of pre-construction site surveys.

Interested Parties	Principal Issues	Progress
		<p>Interested parties may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and interested parties agree are appropriate for effective engagement.</p>

### 1.1.9. Landscape and Visual Effects

Table 1.10: Landscape and Visual Effects

Interested Party	Principal Issues	Progress
LCC (RR-004)	Concerns regarding impacts on landscape features including trees and hedgerows	<p>The Applicant has responded to all queries in relation to this topic through their Responses to Relevant Representation (document reference 15.3) and considers all concerns raised have been suitably addressed. Following the interested parties review of these responses, the Applicant expects these will be resolved.</p> <p>The Applicant has confirmed that further detail on the impacts on hedgerows and trees will be available following detailed design stage, but that all impacts will be within the parameters assessed in the LVIA due to the adoption of a Maximum Design Scenario approach. Tree and hedgerow losses were assessed as part of the LVIA and were demonstrated to be minimal, noting these losses will only be refined down following detailed design.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>
LCC (RR-004) BBC (RR-001)	Mitigation planting	The Applicant has responded to all queries in relation to this topic through their Responses to Relevant Representation (document reference 15.3) and considers all

Interested Party	Principal Issues	Progress
ELDC (RR-002) SHDC (RR-005)		<p>concerns raised have been suitably addressed. Following the interested parties review of these responses, the Applicant expects these will be resolved.</p> <p>The mitigation planting has been developed based on a Maximum Design Scenario and refinements will be undertaken at detailed design stage to ensure that the scheme is sympathetic to the final design. The Applicant has confirmed that any refinements to the mitigation planting would need to be approved through a landscape management plan by the LPA in consultation with LCC in adherence with Requirement 10 of the draft DCO (Document 3.1, version 3).</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>

### 1.1.10. Marine and Intertidal Ornithology

Table 1.11: Marine and Intertidal Ornithology

Interested Party	Principal Issues	Progress
Natural England (RR-045)	EIA assessment methodologies	<p>The Applicant has responded to comments on the EIA assessment methodologies within the Applicant’s Responses to Relevant Representations (document reference 15.3). The Applicant has updated the collision risk modelling to include the latest JNCC and Natural England guidance (JNCC <i>et al.</i>, 2024). In addition, advice on nocturnal activity factors provided by Natural England within their Relevant Representations [RR-045] have been factored into the model for tern species (document reference 15.9E)).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p>

Interested Party	Principal Issues	Progress
		<p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
<p>Natural England (RR-045)</p>	<p>EIA assessment conclusions</p>	<p>The Applicant has responded to comments on EIA assessment conclusions within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant has not concluded a significant effect on any species cumulatively with other planned or consented projects.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
<p>Natural England (RR-045)</p>	<p>Auk displacement rates</p>	<p>The Applicant has responded to comments on auk displacement rates within the Applicant’s Response to Relevant Representations (document reference 15.3). There are disagreements on the appropriate displacement and mortality rates to use within the displacement assessment for auks (guillemot and razorbill). The Applicant is confident that the rates used are appropriate precautionary based on the best available evidence from UK windfarms within the North Sea (e.g. Trinder et al., 2024). However, both approaches have been presented for the updated ORBA assessment (document reference 15.9).</p>

Interested Party	Principal Issues	Progress
		<p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Guillemot bioseason definitions	<p>The Applicant has responded to comments in respect of the guillemot bioseason definitions within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant has used the standard approach and natural England general guidance of using the seasonal definitions from Furness (2015). Due to a peak of birds occurring in the array in August and September, Natural England recommended that an additional post-breeding bioseason should be added into the assessment and that it should be treated as additional. The project considers this methodology to vastly overinflate the predicted impact of the project on guillemot and disagrees that this is an appropriate approach. Both approaches have been provided within the updated ORBA assessment (Odocument reference 15.9).</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>

Interested Party	Principal Issues	Progress
Natural England (RR-045)	Impacts from the ORCP to divers during all phases of development.	<p>The Applicant has responded to comments regarding impacts from the ORCP on divers within the Applicant’s Response to Relevant Representations (document reference 15.3). The Applicant has provided a detailed clarification on ORCP impacts for all stages of the development within the ORBA reports (document reference 15.9). The Applicant will continue to discuss this matter and seek to come to an agreement with Natural England.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>

**1.1.11. Marine Mammals**

Table 1.12: Marine Mammals

Interested Party	Principal Issues	Progress
Natural England (RR-045)	In-combination underwater noise assessment.	<p>The Applicant has responded to comments on underwater noise assessment within the Applicant’s Response to Relevant Representations (document reference 15.3)</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p>

Interested Party	Principal Issues	Progress
Natural England (RR-045)	Noise abatement systems	<p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p> <p>The Applicant has responded to comments on noise abatement systems within the Applicant's Response to Relevant Representations (document reference 15.3). The Applicant maintains that due to no significant impacts in the EIA and no AEoI for HRA, NAS is not required.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>
Natural England (RR-045)	Magnitude scores and the classifications of impact assessment.	<p>The Applicant has responded to comments on magnitude scores and classification of impact assessment within the Applicant's Response to Relevant Representations (document reference 15.3). The Applicant has undertaken IPCod modelling to further quantify population level effect, thus the magnitude scores are considered robust.</p> <p>Natural England may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Natural England following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Natural England agree are appropriate for effective engagement.</p>



### 1.1.12. Noise and Vibration

Table 1.13: Noise and Vibration

Interested Party	Principal Issues	Progress
Fosdyke Parish Council (RR-006) Barry Cooper (RR-080) Anthony Kindred (RR-084) Lisa Kindred (RR-085) Nicola Ann Pearson (RR-091)	Concerns regarding vibration impacts on buildings	<p>The Applicant has responded to all queries in relation to this topic through their Responses to Relevant Representation (document reference 15.3) and considers all concerns raised have been suitably addressed. Following the interested parties review of these responses, the Applicant expects these will be resolved.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>

### 1.1.13. Oil, Gas and Other Offshore Infrastructure

Table 1.14: Oil, Gas and Other Offshore Infrastructure

Interested Party	Principal Issues	Progress
Perenco (RR-053) Shell (RR-060)	Access and line of sight telecommunications with oil and gas platforms.	<p>The Applicant has responded to comments regarding impacts on oil and gas platforms in Relevant Representations (document reference 15.3).</p> <p>The Applicant has continued with dialogue and engagement with Shell and will provide an update in due course.</p> <p>Negotiations over a set of protective provisions are ongoing between the Applicant and Perenco. The Applicant will continue to engage with Perenco over the terms of these protective provisions and will introduce those into the draft Development Consent Order in due course.</p>

Interested Party	Principal Issues	Progress
		<p>Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Interested Parties agree are appropriate for effective engagement.</p>
<p>Orsted Hornsea Project Four Limited (RR-051) Orsted Hornsea Project Three (UK) Limited (RR-052) Race Bank Windfarm Lts (RR-054)</p>	<p>Interference with wind speed or wind direction on the OWF.</p>	<p>The Applicant has responded to comments regarding impacts to wind speed and direction for other OWFs in the Applicant’s Response Relevant Representations (document reference 15.3).</p> <p>Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and Interested Parties agree are appropriate for effective engagement.</p>
<p>Orsted Gunfleet Sands Demo Limited Orsted Hornsea Project Four Limited Orsted Hornsea Project Three (UK) Limited Race Bank Windfarm Ltd</p>	<p>Proximity of the Project to the OWF.</p>	<p>The Applicant has responded to comments regarding impacts to other OWFs by the proximity of the Project in the Applicant’s Response to Relevant Representations (document reference 15.3).</p> <p>Interested Parties may wish to seek further clarification once they have had the opportunity to review the information provided to date, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using</p>

Interested Party	Principal Issues	Progress
RWE Renewables UK Dogger Bank South (West) Limited Race Bank Offshore Wind Limited Equinor New Energy Limited (Equinor New Energy Limited) on behalf of Scira Extension Limited and Dudgeon Extension Limited TC Lincs OFTO Ltd		timeframes and mechanisms that the Applicant and Interested Parties agree are appropriate for effective engagement.

#### 1.1.14. Traffic, Transport and Public Rights of Way

Table 1.15: Traffic, Transport and Public Rights of Way

Interested Party	Principal Issues	Progress
Lincolnshire County Council (RR-004)	Roads to be crossed via trenchless technique	As set out in the Applicant’s Response to Relevant Representation (document reference 15.3), the Applicant is committing to using trenchless technology at all adopted roads. The relevant sections of the Transport Assessment [APP-119] and the Traffic and Transport Chapter [APP-082] in revised versions submitted [AS1-086 and AS1-052] have been updated to reflect this commitment. The Applicant therefore believes this issue has now been resolved.  If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.
Lincolnshire County Council (RR-004)	Draft DCO wording (works in the streets, TROs and road closures)	(Document reference 15.3) the Applicant has engaged with LCC and understands that all highway works will be submitted through the LCC Permitting Scheme as requested and that technical details for certain works will need to be approved in

Interested Party	Principal Issues	Progress
		<p>advance. The Applicant has included the Highway Permitting requirements in the 'Other Consents and Licenses' document. The Applicant therefore believes this issue has now been resolved.</p> <p>If further concerns are raised the applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>

**1.1.15. Hydrology, Hydrogeology and Flood Risk (Water Quality and Resources)**

Table 1.16: Hydrology, Hydrogeology and Flood Risk

Interested Party	Principal Issues	Progress
Environment Agency (RR-018)	Disapplication of the Environmental Permitting Regulations	The Applicant is engaging with the EA regarding the agreement of Protective Provisions. Progress will be sought following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Environment Agency agree are appropriate for effective engagement.
Environment Agency (RR-018)	Flood Risk Assessments (ECC): Insufficient information	<p>The Applicant has responded to all queries in relation to this topic through the Applicant's Responses to Relevant Representation (document reference 15.3) and considers all concerns raised have been suitably addressed, both for the Onshore Substation and the ECC. The Applicant is submitting a clarification in the form of the Landfall Noise Bund Hydraulic Modelling Report (Document 15.07) and an updated ECC and 400kV cable FRA (6.3.24.2)</p> <p>The Environment Agency may wish to seek further clarification once they have had the opportunity to review the information once it is provided, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with the Environment Agency following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Environment Agency agree are appropriate for effective engagement.</p>

Interested Party	Principal Issues	Progress
Environment Agency (RR-018)	Flood Risk Assessment (ECC): Possibility that during landfall cable installation drilling operation, water ingress into the drill cavity could create a flood risk.	<p>The Applicant is carrying out preliminary design work for the landfall drill site and will provide the EA with its proposals for flood protection, including levels when these have been confirmed.</p> <p>The Applicant will continue to engage with the Environment Agency following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and IP agree are appropriate for effective engagement.</p>
Environment Agency (RR-018)	Flood Risk Assessment (ECC): Inclusion and analysis of fluvial and tidal hazard mapping data to inform works within the floodplain.	<p>The Applicant has responded to this request through the Responses to Relevant Representations (document reference 15.3), submitted as part of this suite of documents and considers that the point raised has been suitably addressed. An updated version of the Onshore ECC and 400KV FRA (document 6.3.4.2, version 3) has also been submitted including the mapping referred to.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>
Environment Agency (RR-018)	Flood Risk Assessment (ECC): Working within the floodplain during construction and mitigation measures (including stockpiling and temporary noise bund at landfall).	<p>The Applicant believes this issue has now been resolved through their Responses to Relevant Representation (document reference 15.3) and considers all concerns raised have been suitably addressed. Updated versions of the Onshore ECC and 400KV FRA (document 6.3.4.2, version 3), Outline CoCP (document 8.1, version 2) and Outline Soil Management Plan (document 8.1.3, version 2) have been submitted. The assessment of the landfall noise bund has been clarified through the submission of a Noise Bund Hydraulic Modelling Report (document 15.7, version 1).</p> <p>The Applicant believes that the clarifications provided will address this concern.1.4</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>

Interested Party	Principal Issues	Progress
Environment Agency (RR-018)	Flood Risk Assessments – Onshore Substation: Demonstrating compliance with the ‘exception test’	<p>The Applicant has responded to all queries in relation to this topic through their Responses to Relevant Representation (document reference 15.3) and considers all concerns raised have been suitably addressed, both for the Onshore Substation and the ECC. The Applicant has previously submitted an updated version of the River Welland Breach Modelling Report (AS1-068- AS1-085) which is being reviewed by the EA. The Environment Agency may wish to seek further clarification once they have had the opportunity to review the information once it is provided, at which point the Applicant will provide clarity where needed.</p> <p>The Applicant will continue to engage with the Environment Agency following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Environment Agency agree are appropriate for effective engagement.</p>
Environment Agency (RR-018)	Flood Risk Assessment – Onshore Substation: Concerns regarding the use of 35 years Climate Change allowances	<p>The Applicant has provided a justification for the use of 35 years, explaining that wind farms have a much shorter lifetime compared to other types of infrastructure and 35 years is typical for this type of development within the Applicant’s Response to Relevant Representations (document reference 15.3)</p> <p>The Applicant will continue to engage with the Environment Agency following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Environment Agency agree are appropriate for effective engagement.</p>
Environment Agency (RR-018)	Concerns that the project may interfere with the EA’s annual beach nourishment works, in terms of delays or additional cost.	<p>The Applicant is waiting for the Heads of Terms for an agreement proposed by the EA and has expressed its willingness to enter into an agreement.</p> <p>The Applicant will continue to engage with the Environment Agency following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Environment Agency agree are appropriate for effective engagement.</p>

Interested Party	Principal Issues	Progress
Environment Agency (RR-018) Natural England (RR-045)	Protection of groundwater being secured within the DCO.	<p>The Applicant believes this issue has now been resolved through the Applicant's Responses to Relevant Representations (document reference 15.3), submitted as part of this suite of documents. The Applicant has updated Requirement 18 of the draft DCO to secure the provision of a Water Quality Management and Mitigation Plan as part of the Code of Construction Practice. The Outline Code of Construction Practice (Document 8.1 version 2) has also been updated to reflect this commitment.</p> <p>The Applicant believes that the commitment to this plan resolves the issue.. The Applicant will continue to engage with the Interested Parties following the engagement process outlined in section 1.4 of this document to seek further resolution, using timeframes and mechanisms that the Applicant and the Interested Parties agree are appropriate for effective engagement.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>
Environment Agency (RR-018)	Concerns that if works are carried out on the seabed within 500m of the intertidal area, this could lead to a deterioration of bathing water quality.	<p>The Applicant has undertaken ground investigations in order to inform its design work and can confirm that the landfall exit pits will be a minimum of 500m seaward of Mean Low Water Springs (MLWS). The Applicant has updated the Outline Code of Construction Practice (document 8.1, version 2) and the Outline Cable Specification and Installation Plan (document 8.5) to include this commitment. The Applicant therefore believes this issue has now been resolved.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>
Environment Agency (RR-018)	Potential impediments to possible future East Coast Defences works, which could include sheet pile driving. The concern relates to the need for a 10m consultation zone.	<p>The Applicant has provided the EA with information showing that the cables will be installed at sufficient depth so that sheet piling would be feasible. The Applicant has confirmed, in the Applicant's Response to Relevant Representations (document reference 15.3), submitted as part of this suite of documents, that it requires to be consulted in</p>

Interested Party	Principal Issues	Progress
		<p>advance of future piling work within 10m of the cables. This is not a separation requirement; it is to ensure that the works are carried out safely.</p> <p>The Applicant believes that this clarification resolves the issue.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.41.4 of this document to seek resolution.</p>
Environment Agency (RR-018)	Potential that cable ducts under main rivers create a flood risk after the lifetime of the project.	<p>The Applicant is committing to permanently filling and sealing ducts after cable removal at decommissioning and has updated the draft DCO to include the Environment Agency as a consultee to the Decommissioning Plan. The Applicant therefore believes this issue has now been resolved.</p> <p>If further concerns are raised the Applicant will follow the process outlined in section 1.4 of this document to seek resolution.</p>