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

Our ref: AN/2024/135560/03-L01
Your ref: EN010130

Date: 24 October 2024

Dear Members of the Examining Authority

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

On 13 June 2024, the Environment Agency made Relevant Representations [RR-018] on the proposal by GT R4 (trading as Outer Dowsing Offshore Wind) ("the Applicant") to construct, operate and decommission the Outer Dowsing Offshore Wind Project ("the Project") in the north sea, east of the Lincolnshire coast. The purpose of these Written Representations is to provide an update on the issues, which require further discussion/negotiation, as outlined in those Relevant Representations.

1.0 Draft Development Consent Order [PD1-024]

1.1 ***Article 7 Application and modification of legislative provisions***

No update: we are working with the Applicant to agree Protective Provisions with a view to giving the Environment Agency's consent to the disapplication of the Environmental Permitting Regulations 2016 and we will update the Examining Authority (ExA) on the progress of negotiations on this matter during the Examination.

1.2 ***Article 12 Temporary stopping up of streets***

The Applicant has confirmed that the Environment Agency and its contractors will be able to continue using Roman Bank during the Project's construction and has suggested this commitment is captured in Protective Provisions. The Applicant proposed wording for us to consider, and we discussed this matter during a meeting with them on 16 October 2024. The Environment Agency has proposed some amendments to the wording and asked the Applicant to consider these, but we are satisfied that Protective Provisions are the appropriate mechanism to resolve this issue.

1.3 **SCHEDULE 1, PART 3**
Requirement 9 (Detailed onshore design parameters)
The Environment Agency welcomes its inclusion as a consultee to this requirement, which is included in Revision 3 of the draft Development Consent Order (DCO) – this matter is now resolved.

1.4 ***Requirement 15 (Operational Drainage Management Plan)***
The Environment Agency welcomes its removal as a consultee to the Operational Drainage Management Plan but notes that Requirement 15 has now been expanded to include an emergency flood response plan and it is now included as a consultee for this. We request that we be removed as a consultee to this plan as we do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We would, however, provide advice on the level of flood risk to an area, should the relevant planning authority request it.

1.5 ***Requirement 18 (Code of Construction Practice)***
The Environment Agency welcomes the inclusion of a Water Quality Management and Mitigation Plan, which is now included as part (k) of the Code of Construction Practice (CoCP). We note that an outline of this plan has not been provided – please see comments in paragraph 6.2 below regarding the contents of this plan.

1.6 ***Requirement 24 (Onshore Decommissioning)***
The Environment Agency welcomes its inclusion as a consultee to this requirement, which is included in Revision 3 of the draft DCO – this matter is now resolved.

1.7 **Additional Requirements**
Prohibited Access – Whilst the Applicant confirms that it does not intend to access the beach, access in the event of an emergency may be required. We are continuing discussions in respect of this matter (our concerns relate to the possibility of construction traffic crossing over the Anderby Creek Tunnel, due to its stability), and we will provide further updates during the Examination.

1.8 ***Flood Risk Assessment*** – The Environment Agency notes the Applicant's reluctance to include a requirement for compliance with the Flood Risk Assessment (FRA) in the DCO. We are now satisfied that the required mitigation measures can be appropriately secured under the CoCP and associated documentation. We will continue to work with the Applicant to ensure the outline plans contain reference to these matters, for example, stockpiling excavated materials in areas at risk of flooding, which will be relevant to the Soil Management Plan. Accordingly, we withdraw our request for an additional FRA requirement under Schedule 1 Part 3 of the DCO.

1.9 **SCHEDULE 11, PART 2**
Protection of Bathing Waters
The Environment Agency welcomes confirmation that the Horizontal Directional Drilling (HDD) exit pits will not be within 500m of Mean Low Water Springs (MLWS). This mitigation has now been included in both the Outline Code of

Construction Practice, paragraph 76 [PD1-038] and the Outline Cable Specification and Installation Plan, paragraph 22 [PD1-042]. Accordingly, we are satisfied that this measure will ensure the protection of Bathing Waters, and this matter is now resolved. Accordingly, we withdraw our request for an additional condition under Schedule 11 Part 2 of the DCO. Please also see our comments in paragraph 5.1 below regarding this matter.

1.10 **SCHEDULE 18, PART 4**
Provisions for the Protection of the Environment Agency and Legal Agreement
We continue to have productive discussions regarding Protective Provisions and a Legal Agreement to ensure the Environment Agency will be able to continue its annual beach nourishment works without interruption, during the construction of the Project. We will update the ExA on further progress during the Examination.

2.0 **Book of Reference**

2.1 The Environment Agency is engaging with the Applicant in respect of its landholdings. We are considering Heads of Terms for an Option Agreement but have no further comments to make on this at the current time.

3.0 **Chapter 3 Project Description**

3.1 ***Landfall Construction*** – The Environment Agency was concerned with the Maximum Design Parameters for the cable depth at the landfall location, which was described as being between 5-25m. Following discussions on this matter, we are now satisfied that there will be sufficient clearance for a safe working distance (in line with Environment Agency guidance and procedures) and we will undertake the relevant consultation with the Applicant, if and when we propose to undertake defence works. This matter is now resolved.

4.0 **Chapter 7 Marine Physical Processes**

4.1 ***Morphology*** – Unfortunately, as the National Coastal Erosion Risk Management (NCERM), version 2, is currently in Beta-testing stage, it cannot be used for any consultation processes until after the official release date. Notwithstanding this, NCERM is concerned with erosion of coastal cliffs and dunes, not flooding from the sea, therefore it is doubtful that this product would be useful for this area. An update of the National Flood Risk Assessment (NaFRA) product is also in development; this covers flooding aspects, but again cannot be used for consultation purposes until after the official release date. Local studies, national coastal monitoring data, plus historic data should be used instead.

4.2 Points made by the Applicant in response to beach nourishment are valid. However, the Shoreline Management Plan (SMP) policy for Epoch 3 has yet to be confirmed for this location. The SMP Refresh project, of which the SMP Explorer tool is a product, encourages the use of trigger levels, determined by local coastal groups, to determine any actions and when they should be taken. At present the benefits of protecting the homes, caravans and businesses, plus low lying land, outweigh the costs of providing yearly beach nourishment (at sites where monitoring suggests a need). However, with rising costs and a finite supply of sediment, this cost benefit calculation may switch (from benefit to cost). Therefore, continued beach nourishment cannot be guaranteed.

4.3 Although at present a programme of beach nourishment is in place, the continuation of such a scheme is not guaranteed (see above). Our concern raise in paragraph 8.4 of our representation [RR-018] was more to do with positioning

of cable joint bays/infrastructure should beach nourishment cease and the coast were to respond with a period of rapid erosion (catch-up) to get to a point where it would have been if beach nourishment had not been initiated. In these situations, erosion can continue rapidly, and the coast can "overtake" said position.

4.4 This matter was discussed in a meeting with the Applicant on 16 October 2024, and it was established that detailed engineering would ensure that the cable depth would be sufficient (maybe 15-17 m depth below dunes and 11-12 m below beach - following beach profile and top of bedrock) to prevent exposure if this situation were to arise. This commitment was very encouraging.

4.5 ***Impact Assessment*** - (Receptor pathways to SSSI - the aspect of wave train focusing). Depending on the depth (below the current beach) of the Holocene stratigraphy that the Wolla Bank SSSI is designated for, is encountered there could still be an erosional pathway to this receptor due to wave train focusing and foreshore lowering. As cable protection is unlikely to be used, it is a faint possibility, but it remains, nonetheless. Natural England should be able to provide details regarding the depth below the present beach that the Holocene deposits can be encountered. In other locations these types of deposits can be quite close to the surface. As an aside - stratigraphy is the study of layered rocks (sediments/volcanogenic sediments) with respect to time. Therefore, all sedimentary deposits, including beach material, make up the stratigraphy of an area.

4.6 Information from Natural England, and its representatives, may also be able to provide information on issues encountered with HDD operations during a previous wind farm project in the locality of Anderby Beach. HDD operations had caused, via disturbance of unconsolidated deposits, sinkholes to form on the beach. On the beach, this was probably not too much of a problem, however with similar ground conditions it is possible that HDD operations for this project could have similar results. If this were the case, and sinkholes were formed, but under the sea-bank/flood defence rather than the beach, then this may be a greater issue. This is why Geophysical/Geotechnical investigations were suggested to be undertaken along the cable routes.

4.7 We have reviewed the Applicant’s response regarding sandbars offshore that may benefit the beach/sea defence. We are satisfied with the confirmation that they have now considered this matter and concluded that there will be no impact. This matter would have been usefully addressed in the Environmental Statement as a record that it had been adequately considered.

5.0 **Chapter 8 Appendix 1 Water Framework Directive**

5.1 The Environment Agency raised concerns regarding the assumptions made with respect to the potential impact of the Project on water quality during the Bathing Water season. As mentioned in paragraph 1.9 above, and notwithstanding the difference of opinion regarding potential impacts, we are now satisfied that the Applicant is providing sufficient mitigation to alleviate our concerns. The Applicant has included a commitment in the Code of Construction Practice [PD1-038, paragraph 76] and the Cable Specification Installation Plan [PD1-042, paragraph 22] that the HDD exit pits will be a minimum of 500m offshore of MLWS. This mitigation is considered appropriate to ensure that Bathing Water quality should not be impacted, and this matter is now resolved.

Cont/d..

5.2 Accordingly, the Environment Agency can confirm that it is satisfied with the conclusions of the WFD assessment for issues within its remit and jurisdiction.

6.0 **Chapter 23 Geology and Ground conditions; Chapter 24 Onshore Hydrology and Hydrogeology, and Chapter 24 Appendix 1 - Groundwater Risk Assessment**

6.1 We have reviewed the Applicant's responses to our relevant representations on these topics and we are satisfied with the responses concerning land contamination and groundwater protection and acknowledge that a Water Quality Management and Mitigation Plan (WQM&MP) will now be submitted as part of the final CoCP.

6.2 We advise that this must be supported by a revised Groundwater Risk Assessment, which should demonstrate a conceptual understanding of groundwater and the potential risks to the underlying principal chalk aquifer, prior to the construction phase of the project, and confirm the mitigation measures required to manage any risks identified. It is currently unclear whether the revised Groundwater Risk Assessment will form part of the WQM&MP, if it will be submitted under Requirement 16 (as the CoCP alludes to this being a 'Contaminated Land and Groundwater Scheme', although the wording of Requirement 16 appears to place more emphasis on this being more of a contamination remediation scheme), or if it will be a standalone document. If it is the latter there does not appear to be a requirement in the DCO to secure this and allow the Environment Agency an opportunity to comment on it before the work commences. Accordingly, we would be grateful if the Applicant could confirm how the submission of the revised Groundwater Risk Assessment will be secured.

7.0 Chapter 24 Flood Risk; Chapter 24 Appendix 2 Flood Risk Assessment Onshore ECC & 400kV [PD1-036 clean; PD1-037 tracked]

7.1 We have reviewed the Applicant's responses to our Relevant Representations on flood risk, together with the revised Flood Risk Assessment (FRA) for the Onshore ECC & 400kV works. We note several comments from the Applicant regarding points raised by us in terms of the portrait of risk and the protection provided by the defences. We accept that these matters are also covered in the FRA and do not change the impact assessment, but we are disappointed that Chapter 24 is not being updated to acknowledge flood risk better.

7.2 ***River Welland Access*** – The Applicant provided us with additional information in the form of a Technical Note ('Access arrangements alongside the River Welland', ref: PP1-ODOW-DEV-CS-NOT-0087_03, dated 8 October 2024) [see Appendix 1 attached], which has demonstrated that the use of the access track (or the laying of temporary surfacing material) adjacent to the River Welland will not undermine the stability of the flood defence at Fossdyke Bridge. The Technical Note provides the assurance we requested, and this matter is now resolved.

7.3 ***Sensitivity Value*** – We note the Applicant's comments concerning the sensitivity value assigned to areas of floodplain within the study area (APP-079, Table 24.17: Sensitivity values for potential receptors). We acknowledge that the residual risk may indicate a low sensitivity value as it is a defended floodplain, however, the potential impacts in the event of a breach could be high due to the route passing populated 'more vulnerable' areas and this will impact upon the sensitivity value.

7.4 ***Decommissioning of the Onshore Infrastructure*** – The Environment Agency welcomes the reference to the decommissioning of onshore infrastructure now included in the updated FRA [PD1-036] and our inclusion as a consultee to Requirement 24 in the DCO for the Decommissioning Plan.

7.5 ***Stockpiling within the floodplain*** – The updated FRA [PD1-036] refers to and includes the tidal and River Steeping hazard maps and confirms that stockpiling and other works in the higher hazard class rating areas will be minimised or avoided where possible to mitigate any increased risk and allow flood flow through and within flood cells. We support the principle of this. However, there are significant areas of hazard (not just in the higher hazard class areas) along the route where stockpiling may divert flood flow routes and impact third parties, particularly around areas of development (e.g. Wainfleet). The FRA confirms that the details (stockpiling and phasing) will be finalised post-consent.

7.6 To resolve our objection on this point, we need assurance that stockpiling and other works in hazard areas are avoided and, where necessary, are minimised and designed to allow flood flows through and within flood cells. We are satisfied that final stockpiling and phasing arrangements can be secured through the outline Soil Management Plan (oSMP). However, the oSMP and the FRA must be updated to reflect this in all hazard areas (not just the higher hazard class). We welcome the confirmation in paragraph 74 of the oSMP that all stockpiling will be located on the landward side of any flood defences.

7.7 ***Climate Change –*** The Environment Agency advised that '*The FRA must demonstrate that the climate change allowances used and scenarios within the Environment Agency modelling are appropriate to use. This point applies to the Steeping Hazard Mapping and any fluvial modelling used*'. The Applicant's response states that '*the climate change scenario considered (2115) is in excess of the lifetime of development (2065) and is therefore considered a conservative assessment of risk*'. This should be recorded in the FRA to demonstrate that the climate change allowances are appropriate, and that flood risk has been assessed and considered for the lifetime of the development.

7.8 ***Noise Bund Assessment –*** The Environment Agency requested that an assessment be undertaken to demonstrate the impacts of land raising for the noise bund on overland flow routes and set out any mitigation required. The Applicant's detailed hydraulic modelling was received on 14 October 2024, and we are currently reviewing this. We will provide further comments on this when our review is complete. Consequently, we cannot currently confirm if the modelling is 'fit for purpose' or whether the updated FRA is adequate with respect to this.

7.9 ***HDD Pit Bunding*** – We note the Applicant is preparing the indicative design arrangements for the landfall drill site, including arrangements for flood protection around the HDD drill pits, in response to our request for additional information on this. We look forward to reviewing this in due course and we will provide further advice to the ExA on this issue during the Examination.

8.0 **Chapter 24 Flood Risk; Chapter 24 Appendix 3 Flood Risk Assessment Onshore Substation (OnSS)**

8.1 ***Hydraulic modelling of the OnSS*** – The Applicant provided an updated version of the River Welland Breach Modelling (Version 3) to the Environment Agency on

25 July 2024. We undertook a review of this, but there are queries that still need to be addressed – these were communicated to the Applicant on 10 September 2024, and we are currently awaiting a response to these. Therefore, we are not yet able to provide any further advice on this matter.

8.2 ***Lifetime of Development and Climate Change*** – The Environment Agency raised concerns regarding the operational life of the development potentially extending beyond its 35-year design life. The Applicant has responded satisfactorily to this point in relation to the ECC but not the OnSS.

8.3 The Applicant's response to this representation [PD1-071, ID no. 85] appears to have misunderstood the Environment Agency's reference to another Nationally Significant Infrastructure Project as we are not "*basing this comment on the examination of another infrastructure project, the Immingham Green Energy Terminal*"; this project was given simply as an example of where this issue had been considered in detail recently, during Examination Hearings. It was hoped this example would assist the Applicant in understanding the representations we are making. The Environment Agency's comments on this issue are based entirely on the requirements of national planning policy and guidance.

8.4 The FRA has not considered (or assessed) the potential scenario that the OnSS may remain in place beyond the 35-year design life in relation to the impact on 3rd parties and climate change. As the OnSS is to be built on a raised platform the Applicant must assess whether this land raising will increase the risk of flooding elsewhere. The assessment can only be limited to the 35-year design life if it is accompanied by a Requirement that the OnSS is decommissioned in 2065, and the land returned to its original level – there is currently no requirement in the DCO to ensure this happens. Without such a decommissioning requirement there is a chance that the OnSS may remain operational beyond its 35-year design life (component parts may be renewed/replaced) and the impacts of this on 3rd parties have not been assessed.

8.5 The Overarching National Policy Statement for Energy (EN-1), paragraph 5.8.7 states that "*Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime <u>without increasing flood risk elsewhere</u> and, where possible, by reducing flood risk overall*" [emphasis added]. Ensuring that a project does not increase flood risk elsewhere is a fundamental part of passing the flood risk Exception Test (EN-1, paragraph 5.8.11). Paragraph 5.8.12 goes on to say that "*Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. <u>There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site</u>*".

8.6 The Planning Policy Guidance to the National Planning Policy Framework, Flood Risk and Coastal Change Section, paragraph 006 states that "*The lifetime of a non-residential development depends on the characteristics of that development but <u>a period of at least 75 years is likely to form a starting point for assessment.</u> Where development has an anticipated lifetime significantly beyond 100 years such as some major infrastructure projects, or where it would create significant land-use change such as a new settlement or substantial urban extension, it may be appropriate to consider a longer period for the lifetime of development when*

assessing the potential impacts of climate change on flood risk or coastal change……"

8.7 In line with the above policy requirements, the Environment Agency requests that the Applicant either carries out an assessment of the raised platform and OnSS remaining in place beyond 2065 (using at least 75 years to form a starting point) and in particular the impact this will have on 3rd parties in relation to climate change. Alternatively, the DCO must include a requirement to ensure the OnSS is fully decommissioned in 2065 and the land restored to its original, pre-construction, level.

9.0 **Noise bund hydraulic modelling report and Figures [PD1-075 PD1-076; PD1-077; PD1-078; PD1-079]**

9.1 As mentioned in Paragraph 7.8 above, the Environment Agency is currently undertaking a review of the hydraulic modelling and we will provide further advice on this in due course.

10.0 **Summary**

10.1 In summary, although some of the issues raised in our Relevant Representations have been resolved, there are still outstanding matters as detailed above. As such, we continue to maintain the holding objections to the Project and confirm that the Principal Areas of Disagreement [PD1-104] have not yet been resolved.

We reserve the right to add or amend these representations, including requests for DCO Requirements should further information be forthcoming during the course of the examination on issues within our remit.

Should you require any additional information or wish to discuss these matters further, please contact me using the details below.

Yours sincerely

Annette Hewitson
Principal Planning Adviser

Direct dial [redacted]
Direct e-mail [redacted]environment-agency.gov.uk

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APPENDIX 1

Technical Note for the Environment Agency re ‘Access arrangements alongside the River Welland’ (ref: PP1-ODOW-DEV-CS-NOT-0087_03, dated 8 October 2024)

Technical Note to the EA

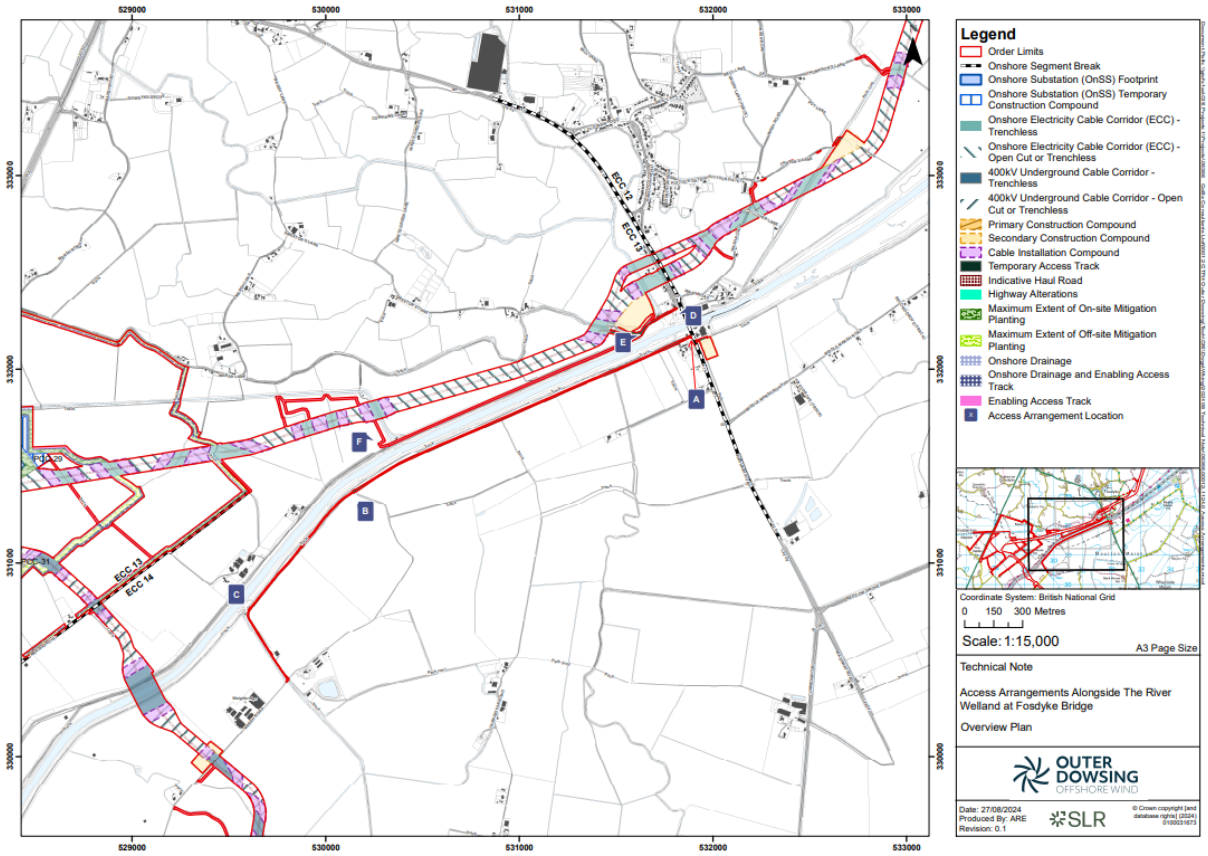
Document Title	**Access arrangements alongside the River Welland**
Document Number:	**PP1-ODOW-DEV-CS-NOT-0087_03**
Date	**08/10/24**
Sharepoint location	
Revision:	**03**
Revision Status:	**Updated to include ODOW mapping, IDB asset information and additional photographs**

1. **Introduction** The EA has made the following comment within its 'Relevant Representation' requesting more information regarding the Applicant's proposed access works alongside the River Welland:

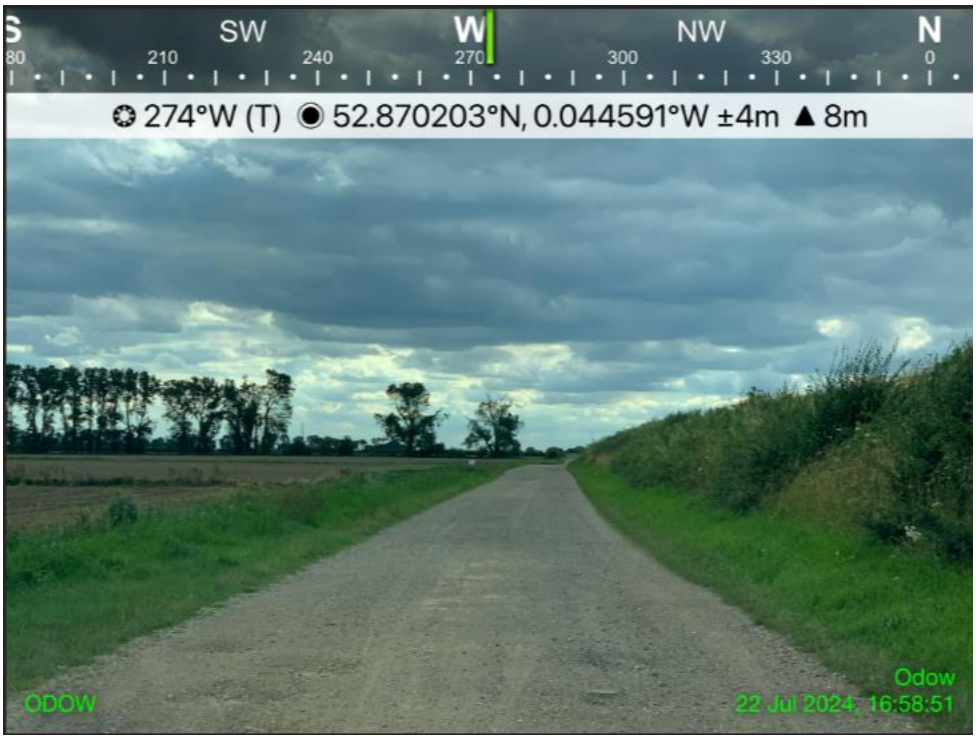
13.0.7 Table 24.2 (on page 28) states in response to an Environment Agency comment that "It is not intended to locate the cables within the flood defence. At its closest point, the cables would be a minimum of 40m from the flood defence upstream of Fossdyke Bridge. It is possible that this is a miss understanding of the plans, which show a temporary access track running along the flood defence". We would like to discuss this matter with the Applicant to determine if the ***location of the temporary access track, which runs along the flood defence, is appropriate.*** *The Applicant may need to provide evidence to demonstrate that the proposed access track would not undermine the defence.*

The Applicant has produced this document to provide the EA and IDBs with more information regarding the proposed works and use of the access tracks in close proximity to the River Welland tidal river defences.

2. **Overview Plan** The comments relate to the access routes alongside the River Welland, shown in the image below:



3. **Section A-B.** This section of track is an existing stoned private access road from the A17 on the south side of Fosdyke Bridge (The Applicant Construction access point AC-51 (opposite the Ship Inn)). The image below is typical of the track in this section.



Works in this section comprise:

- Filling of potholes
- Installation of 9 passing bays

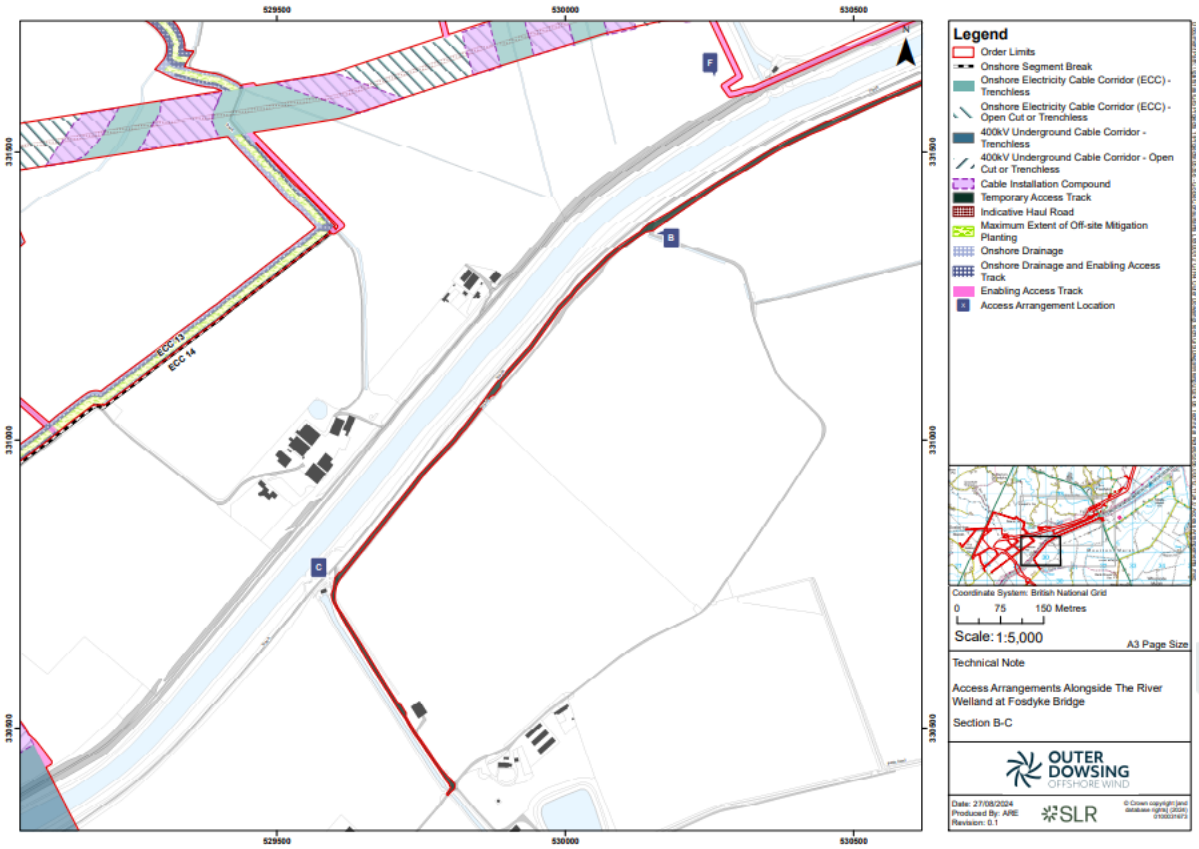
Where passing bays are proposed, the track will be widened to approximately 8m. The bays will be located on the opposite side to the flood defence. Construction of the passing bays will be the same as for the haul road described in section 8.1.5.6 'Haul Roads' under Chapter 3 Project Description– excavation of surface material, the laying of geo-textile and placing of aggregate up to 300mm in depth. The passing bay will be graded to match the existing track with a slope to allow water to drain to the adjacent ditch. The excavation depth will be to the depth of the topsoil or a maximum of 300mm.

The track includes an existing crossing of the SHIDB maintained Wragg Marsh Drain (sluice) which was refurbished in 2022. Pre- and post-construction surveys will be required for this IDB asset.

The location of the passing bays is shown in Chapter 27 Appendix 1 Transport Assessment Annex N Passing Place Proposals, Location 015 'A-17 to Grid Connection Cable Corridor Passing Place Plan' (document AS1-094). It is noted that the passing bays will not be within 9m of the IDB drain crossing.

This existing track will be used for cable construction access, including plant deliveries, construction materials and cable drum deliveries.

4. **Section B – C**. This section of track is not stoned and comprises a rutted dirt track, used by agricultural vehicles. The section terminates adjacent to the South Holland IDB Lords Drain pumping station, where it meets the existing track known as 'Old Sea bank', . There is a pole-mounted transformer serving the pumping station which may require protection. This section also includes a crossing of a high-pressure National Gas Transmission (NGT) pipeline.



The image below is taken from the top of the defence, looking west towads the South Holland Lords Drain pumping station at point C.

The image below, looking east towards Fosdyke Bridge, shows how the land slopes away from the embankment.

Works in this section comprise:

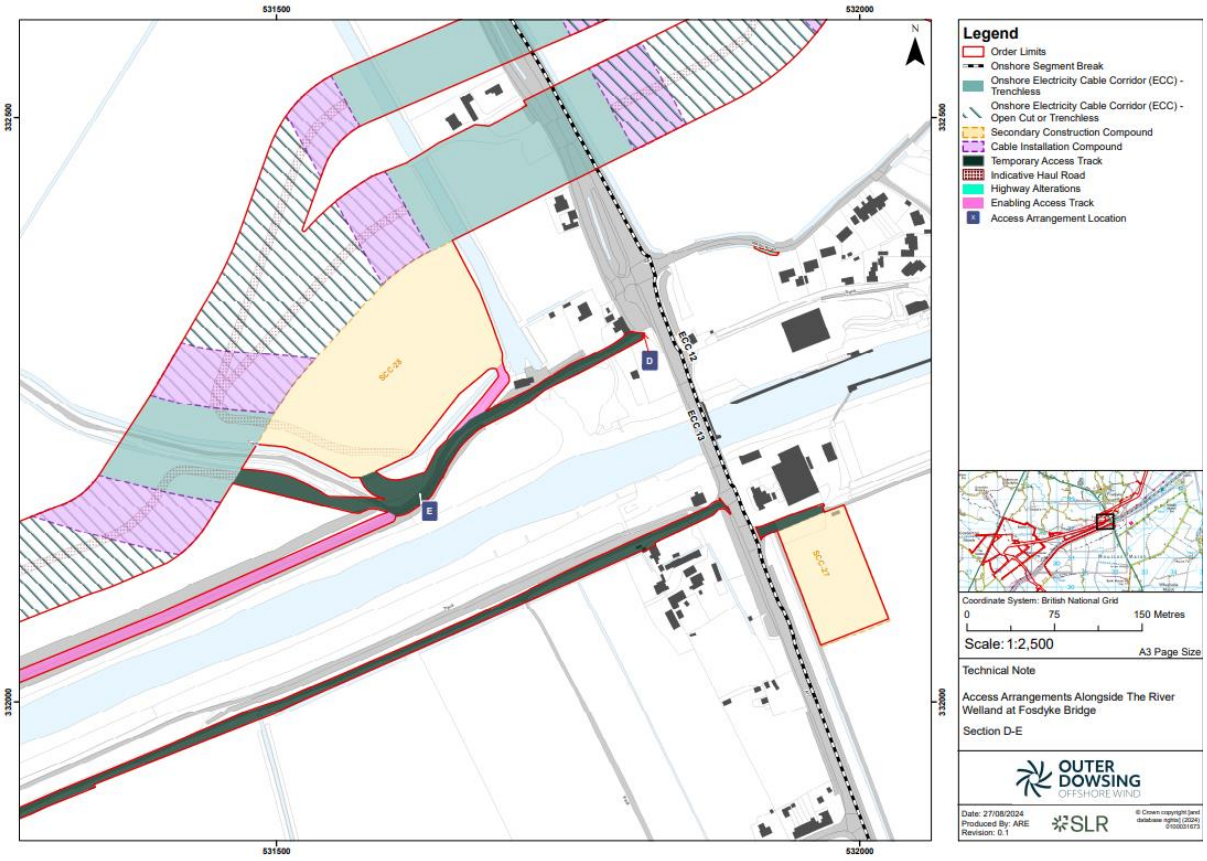
- Creating a temporary haul road approximately 5m in width where there are passing places the haul road will be 8m wide (effectively a temporary extension to the existing track in section A-B).
- Typical temporary haul road construction is described in the application documents in the Project Description Chapter (document 6.1.3, APP-058) section 8.1.5.6.
- One existing tracked area (at 'C') will be stoned to create a passing bay, one other bay will be created.

- The road will be constructed using Terram, geotextile and 300mm of aggregate following California Bearing Ratio (CBR) testing (subject detail design)
- Loose surface material will be excavated up to 300m (subject to the topsoil depth) as required.
- Protection will be installed at the gas pipeline crossing. The specification will be agreed with NGT.
- The track will be graded to shed surface water onto the grassed area on the opposite side to the flood defence.
- The location of the passing bays is shown in Chapter 27 Appendix 1 Transport Assessment Annex N Passing Place Proposals, Location 015 'A-17 to Grid Connection Cable Corridor Passing Place Plan' (document AS1-094).
- Speed limits of 15mph will be in place for all construction traffic.
- Routing monitoring and maintenance of the installed road will be in place until removal to as-found condition.

This temporary haul road will be used for cable construction access, including plant deliveries, construction materials and cable drum deliveries.

To the south of point C, the existing track (Old Sea Bank) runs alongside the SHIDB Lords Drain. Construction of one passing is planned to this section, on the opposite side to the drain and will require pre-construction approval from SHIDB, in accordance with the Protective Provisions.

5. **Section D-E.** This section of existing track starts at the A17 at point D (The Applicant construction access AC-47) and is an existing road that serves the Welland and Deeping Five Towns Drain Pumping Station, where the track crosses over the sluice. At point E there is a small track leading to the field to the north where the Applicant will site a temporary construction compound (SCC26).

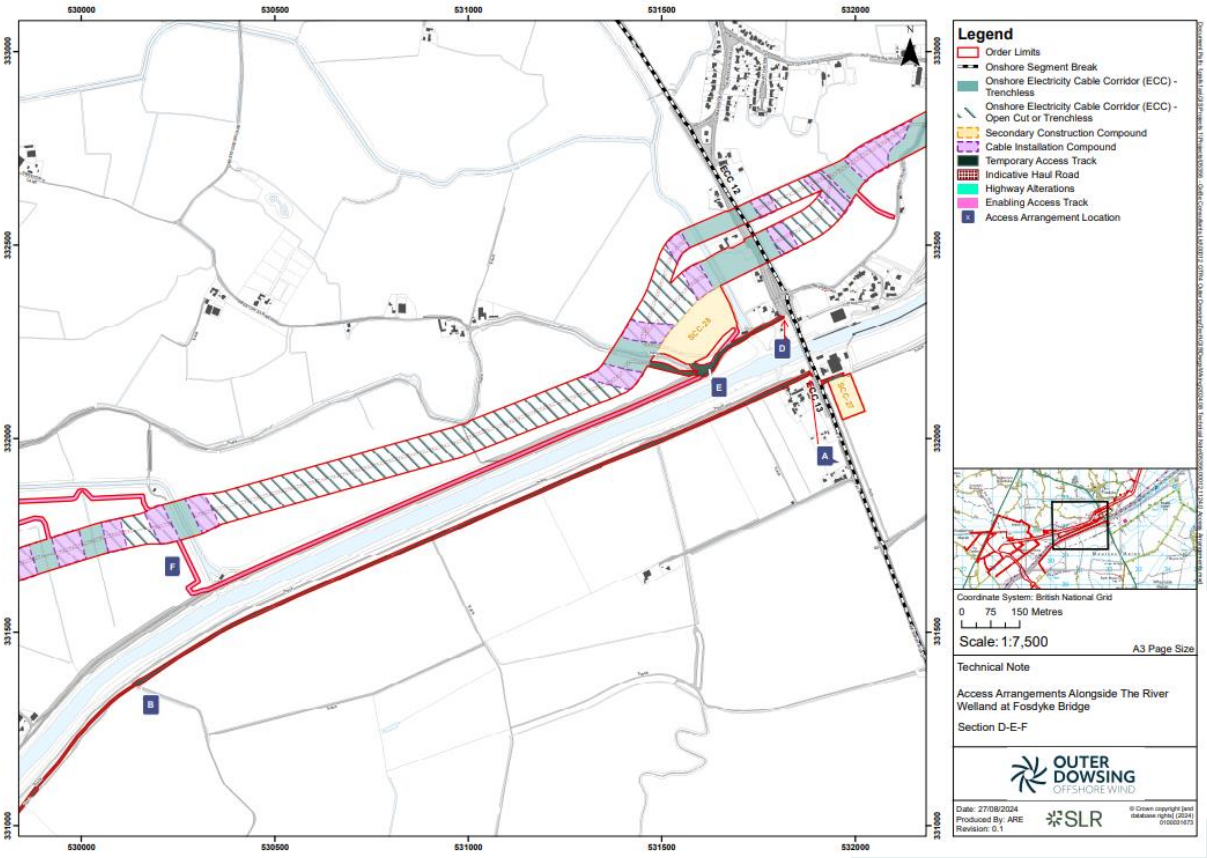


The works in this section comprise:

- Filling potholes in the existing track
- Creating a haul road / ramp at point E to connect to the temporary (secondary) construction compound SCC26.
- The haul road will be approximately 5m in width and constructed using geotextile and aggregate.
- Loose surface material will be excavated up to 300m as required following CBR testing
- Typical temporary haul road construction is described in the application documents in the Project Description Chapter (document 6.1.3, APP-058) section 8.1.5.6.
- The depth of stone will vary because of the requirement to achieve a uniform sloping track from the level of the existing track to the field level.
- Surface water management will be considered in the design of this sloping track and water will be directed away from the defence into the adjacent field.
- Speed limits of 15mph will be in place for all construction traffic.
- Routine monitoring and maintenance of the installed road will be in place until removal to as-found condition.

This existing track and the additional section of temporary haul road will be used for cable construction access, including plant deliveries, construction materials and cable drum deliveries. It will be the access point to the temporary secondary construction compound, housing welfare facilities and equipment storage and will be used by additional traffic associated with the compound construction and use.

6. Section E-F Enabling Access



The enabling access routes utilise an existing access track, serving the WDIDB Risegate Eau pumping station and agricultural field entrances. The existing track crosses the sluice channel from the Risegate Eau pumping station.

No works are required to the enabling access routes, which will be used by agricultural type vehicles. The pre-construction works, and the use of the enabling accesses is described in the application documents in the Project Description Chapter (document 6.1.3 APP-058), section 6.1.3.

Enabling access is require allowing access to the export cable corridor, for early works, such as surveying, vegetation clearance, ditch preparation and fencing, in advance of the creation of construction accesses and haul roads. The enabling

accesses are also likely to be used during the reinstatement stage and also for any post-construction remedial drainage.

7. Pre-construction approvals

Construction works within 16m of a tidal river defence will require pre-construction approval, in accordance with the protective provisions for the benefit of the Environment Agency contained in Part 4 of Schedule 18 of the draft DCO (document 3.1). The technical design of the works within 16m of the river Welland defences will be submitted to the Environment Agency for approval prior to commencement of the works.

Details will also be submitted to Welland and Deepings IDB and South Holland IDB regarding the drain / sluice crossings, and works alongside the Lords Drain in accordance with the protective provisions for the benefit of the drainage authorities contained in Part 5 of Schedule 18 of the draft DCO.