

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

**Our ref:** AN/2024/135560/05-L01  
**Your ref:** EN010130  
**Date:** 13 December 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)**

Pursuant to Deadline 3, the Environment Agency notes that the Examining Authority invites comments on any submissions received at Deadline 2. Accordingly, we provide comments on the following submissions, together with updates relating to other matters within the Environment Agency's remit.

**[\[REP2-010\]](#) Draft Development Consent Order - clean**

We note that the draft Development Consent Order (DCO) has been amended at the request of Lincolnshire Council Council [\[REP1-053\]](#), to remove the placement of the Soil Management Plan (SMP) from Schedule 1, Part 3, Requirement 18(2)(d) into a separate Requirement (Requirement 31). The SMP is of interest to the Environment Agency as it is within this document that stockpiling of materials within the floodplain, and in relation to flood defences, will be detailed (See [REP2-039](#) – Schedule of Mitigation, measure references: 104; 106; and 107). Therefore, we request that the Environment Agency be included as a specific consultee to the discharge of Requirement 31 to enable us to advise on these matters in relation to flood risk mitigation.

**[\[REP2-029\]](#) Outline Code of Construction Practice**

We welcome the confirmation included in paragraph 127 of the outline Code of Construction Practice (CoCP) that the Groundwater Risk Assessment (document reference 6.3.24.1 [APP-210]) will be updated in the pre-construction phase and used to inform the scope of the Water Quality Management and Mitigation Plan (WQM&MP). This will also be appended to the WQM&MP and submitted for approval as part of that plan. Accordingly, the issue raised in section 6.0 of our Written Representation [\[REP1-048\]](#) is now resolved.

**Action Points from Issue Specific Hearing 1**

The Environment Agency notes the action points arising from Issue Specific Hearing 1, particularly action points 8 and 9 relating to agreement of Protective Provisions. We will

endeavour to reach agreement on the Protective Provisions within the timescale requested. However, we would like to highlight that alongside the Protective Provisions, the Environment Agency is also requesting the Applicant enters into a side agreement to ensure the installation of the Export Cable Corridor does not adversely affect or delay the annual beach nourishment works that we undertake along the Lincolnshire Coast (please refer to section 4.0 of the Environment Agency's Relevant Representations [[RR-018](#)] for information on why this is essential).

Discussions around capturing the practicalities of working together within the landfall area are complex and have been ongoing for some months. Although the Environment Agency is taking steps to expedite these discussions, we would like to highlight that the legal agreement and the Protective Provisions are being drafted to work hand in glove. As such, our agreement is dependent on both being completed. Accordingly, we may not be in a position to either confirm our agreement or provide a final preferred draft of the Protective Provisions at Deadline 4.

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

Yours sincerely

**Annette Hewitson**  
**Principal Planning Adviser, MSc, MRTPI**

Direct dial [REDACTED]

Direct e-mail [REDACTED]@environment-agency.gov.uk