

Gate Burton Energy Park

EN010131

Response to Rule 17 - Request for further information re HDD and cabling under the River Trent
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1. Introduction

1.1.1 This technical note has been prepared in response to the Examining Authority's Rule 17 letter that was received on 8th November regarding a Request for Further Information on horizontal directional drilling (HDD) and associated cabling under the River Trent.

1.1.2 The Request is provided below:

'I refer to the Deemed Marine Licence, which is currently included in the draft Development Consent Order, and the Grid Connection Construction Method Statement [APP-114] which sets out the methodology to be employed for Horizontal Direct Drilling (HDD). This does not appear to include potential for issues or problems arising during construction or operation e.g the HDD being stuck during drilling or cabling during pulling through, such that may require intervention including seeking to directly access the bored tunnel to retrieve the Drill head etc potentially including digging a pit within the exclusion zones or requiring access pits if there is a failure of the cable during operation. I require the Applicant and MMO to consider and comment with reasoning on the following:

- Whether such a scenario has been considered and assessed including the potential likely environmental effects that may result and where this is addressed in the Environmental Statement.*
- If it has not, the Applicant to provide a risk assessment along with any necessary assessment of environmental effects to the marine environment that may follow and identify any mitigation measures that would be necessary.*
- How would the Applicant address such an incident without carrying out works within the area that may be within the exclusion zone for the River Trent.*
- Are such interventions if required covered by the Deemed Marine Licence or would further description need to be included within the DML.*
- The MMO has suggested the Applicant could apply for a standard Marine licence if the previously suggested exemption was not available at the point of construction how would this affect the Applicant's development timetable in terms of time and cost in a standard HDD operation where no incidents arose. Also if such a scenario as described above in the context of failure of the drilling or cabling arose to what extent would a requirement to apply for a Marine Licence add to the delay and potential costs and would this affect the viability of the scheme.*
- The MMO to comment specifically on how the abovementioned failure scenario would affect its position in respect of the necessity for a DML and any conditions that would be required and whether such ancillary activities would be covered by the previously identified exemption.*
- Should the dDCO not include a Deemed Marine Licence what would the MMO's expected decision time on an application for a standard marine licence be.'*

2. Response

2.1.1 The response below addresses each bullet point included in the Rule 17 letter in turn.

Bullet point 1: Whether such a scenario has been considered and assessed including the potential likely environmental effects that may result and where this is addressed in the Environmental Statement.

2.1.2 The potential for issues arising during construction or operation such that may require intervention have been considered in the Environmental Statement within **Chapter 9: Water Environment [APP-018]**. The specific relevant sections are referenced below as part of this Technical Note.

2.1.3 It should be noted that the probability of issues arising during construction or operation associated with HDD are extremely rare due to the extensive pre-planning activities that are undertaken prior to any construction activities on site. Pre-planning activities include:

- Pre site risk assessment;
- Utility search;
- Land registry search;
- Topographical survey;
- Borehole survey;
- Bathymetric survey; and
- CBR survey.

2.1.4 The completion of these surveys then informs:

- the proposed sites of the launch and receive pits;
- the trajectory of the drill;
- the type of drill tool (head) to be achieved and the additives required for the proposed drill.

2.1.5 The pre-planning activities outlined above are designed to greatly reduce any issues during construction or operation associated with HDD, such as the risk of additives escaping the bore, recovery of any bits within the bore, and a collapsed bore.

2.1.6 Nevertheless, potential impacts associated with unplanned events in relation to installation of cables via directional drill methods are considered below. Unplanned event impacts could comprise:

- Pollution of surface or groundwater due to deposition or spillage of soils, sediment, oils, fuels, or other construction chemicals, or through uncontrolled site run-off, or break out of drilling fluids;
- Impacts on sediment dynamics and hydromorphology associated with a collapsed bore hole following removal of a drill; and
- Potential impact on groundwater quality from piling and dewatering operations such as those associated with the need for boreholes or pits to retrieve the drill bit.

- 2.1.7 Pollution of surface or groundwater due to bentonite is considered within **Chapter 9: Water Environment [APP-018]**. Please refer to paragraph 9.10.13 which concludes that with mitigation in place such as the preparation of a frac-out risk assessment which is secured by Requirement 12 (via the **Framework CEMP [REP4-035]**), the risk to water quality of the River Trent, Seymour Drain, Marton Drain and the affected agricultural ditches is considered negligible from HDD cable installation. Further information is provided in the Risk Assessment in response to bullet point 2 below.
- 2.1.8 Impacts on sediment dynamics and hydromorphology associated with a collapsed bore hole following removal of the drill and the potential impact on groundwater quality from piling and dewatering operations such as those associated with the need for boreholes in the River Trent are considered in the risk assessment in response to bullet point 2 below.
- 2.1.9 The potential for impacts on aquatic ecology as a result of HDD and cabling issues during the construction and operational phase has been considered, however any additional excavation required in the avoidance area would be unlikely to affect aquatic species, and therefore is not considered further within this technical note.

Bullet point 2: If it has not, the Applicant to provide a risk assessment along with any necessary assessment of environmental effects to the marine environment that may follow and identify any mitigation measures that would be necessary.

- 2.1.10 A risk assessment is provided below which assesses the potential environmental effects on the water environment should there be HDD and cabling issues during the construction and operational phase. Measures to mitigate effects are also identified.

Introduction

- 2.1.11 A set of avoidance areas (as shown on **ES Volume 3: Appendix 2-B (Figure 1) [APP-114]**) have been assigned within the Grid Connection Corridor where watercourses would be crossed by a HDD methodology rather than intrusive, open-cut techniques. This includes the crossing of the WFD designated River Trent (approximate NGR SK 83100 80985), Marton Drain (approximate NGR SK 83693 81149) and Seymour Drain (approximate NGR SK 82087 80693).
- 2.1.12 As stated within **Appendix 2-B: Grid Connection Method Statement [APP-114]** the sections of the cables that will be installed via HDD will require launch and reception pits to be installed at distances between 200m and 500m (750m in one or two exceptional circumstances) along the HDD section of the route.
- 2.1.13 Except in unplanned event circumstances, there is to be no disturbance or intrusion within the avoidance areas on the east and west sides of the River Trent. As set out below, the likelihood of access being required into these areas is extremely low. However, in exceptional emergency situations such as a need to recover a drill head, work may be needed within the avoidance areas. The Outline Design Principles **[REP4-005]** and the Framework CEMP **[REP4-035]** have been updated at D5 to reflect this by exception approach.

- 2.1.14 The crossing of the River Trent will be HDD with a pit on the western side of the Environment Agency Flood Defences (on the western side of the River Trent) and another on the eastern side of the river, east of the existing flood defence. These will be located >16m from the toe of the existing flood defences. No construction works would occur within the Avoidance Area shown in Annex A within **Appendix 2-B: Grid Connection Method Statement [APP-114]**.
- 2.1.15 For the purposes of assessment, up to a maximum of forty (40) launch and reception pit working areas for HDD are assumed within the Grid Connection Corridor. Each pit would be a maximum of 5m length x 5m width x 3m depth. The minimum depth of drilling under the River Trent would be a minimum of 5m beneath the bed.
- 2.1.16 Note that other than exceptional unplanned event circumstances, whilst there will be no open trench or launch/exit pits in the Avoidance Areas, parts of the haul road will cross a number of Avoidance Areas, except for within areas identified as 'No Temporary Access'. These are further discussed below and identified in Annex A **Appendix 2-B: Grid Connection Method Statement [APP-114]**.

Baseline

- 2.1.17 As explained above in paragraph 2.1.2 it is extremely unlikely that there would be any issues associated with HDD during construction or operation, however, if there were issues during construction or operation associated with the cabling, the following water environment receptors could be affected:
- River Trent ((Trent from Carlton-on-Trent to Laughton Drain WFD waterbody) (approximate NGR SK 83100 80985) – very high importance receptor for water quality; low importance receptor for morphology;
 - Marton Drain (Marton Drain Catchment (Trib of Trent) WFD waterbody) (approximate NGR SK 83693 81149) - high importance receptor for water quality; low importance receptor for morphology;
 - Seymour Drain (Seymour Drain Catchment WFD waterbody) (approximate NGR SK 82087 80693) - high importance receptor for water quality; low importance receptor for morphology; and
 - Groundwater (Lower Trent Erewash – Secondary Combined WFD groundwater body) - medium importance for bedrock and superficial aquifers.

Potential Impacts

- 2.1.18 In the unlikely event that there are issues with the HDD and cabling during the construction and operation phases the following potential impacts could result in adverse effects to the water environment:
- Pollution of surface or groundwater due to bentonite (drilling fluid) break out within the watercourse;
 - Sediment release to surface or groundwater due to need to recover a broken drill bit;

- Impacts on sediment dynamics and hydromorphology associated with a collapsed bore hole following removal of a drill; and
- Potential impact on groundwater quality or flow from piling and dewatering operations such as those associated with the need for boreholes or pits.

Mitigation

2.1.19 Avoidance and mitigation measures have been embedded into the Scheme to minimise construction impacts on the water environment. These are included in the following sections with general mitigation measures (e.g. within the scheme design and Framework CEMP) presented first, followed by specific mitigation measures to address the potential impacts outlined above.

General Mitigation Measures

Scheme Design

- 2.1.20 Underground techniques (such as HDD) will be used to install power cables beneath the River Trent. For all watercourses within the grid connection corridor, except for the River Trent, the depth of drilling beneath the watercourse bed would be a minimum of 2m, in keeping with IDB requirements. The minimum depth under the River Trent would be 5m as secured by the **Outline Design Principles [REP4-004]**.
- 2.1.21 As mentioned above in paragraph 2.1.2, HDD is a reliable technology which rarely experiences issues during construction or operation due to the extensive pre-planning activities that are undertaken prior to any construction activities on site.

Framework CEMP

- 2.1.22 The construction of the Scheme will take place in accordance with a Construction Environmental Management Plan (CEMP). The CEMP details the measures that would be undertaken during construction to mitigate the temporary effects on the water environment. The **Framework CEMP [REP4-035]** and is secured through Requirement 12 of the **Draft Development Consent Order (DCO) [REP4-023]**. The Framework CEMP provides the structure and content for the detailed CEMP, which will be completed once a contractor is appointed.
- 2.1.23 The Framework CEMP comprises good practice methods that are established and effective measures to which the development will be committed through the development consent. The Framework CEMP includes measures to manage the risk of pollution to surface waters and the groundwater environment. It also considers the management of activities within floodplain areas (i.e. kept to a minimum and with temporary land take required for construction to be located out of the floodplain as far as reasonably practicable).
- 2.1.24 The CEMP will be reviewed, revised and updated as the project progresses to ensure all potential impacts and residual effects are considered and addressed as far as practicable, in keeping with available good practice at that

point in time. The principles of the mitigation measures set out below are the minimum standards that will be implemented. However, it is acknowledged that for some issues, there are multiple ways in which they may be addressed and methods of dealing with pollutant risk will be continually reviewed and adapted as construction works progress (e.g. the management of construction site runoff containing excessive levels of fine sediments).

- 2.1.25 The Framework CEMP is a standard procedure for the Scheme and describes the principles for the protection of the water environment during construction. The final CEMP will be supported by a Water Management Plan (WMP), that will provide greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction. The potential for adverse impacts would be minimised by the adoption of the general mitigation measures outlined below, which will be described in the WMP and CEMP.
- 2.1.26 In terms of mitigation, there are a number of specific measures which would reduce the risk of the above potential impacts from occurring. These are referenced below in relation to the specific impacts.
- 2.1.27 It will be a requirement that the watercourses are reinstated as found and water quality monitoring will be undertaken prior to, during, and following on from the construction activity.

Pollution of surface or groundwater due to bentonite break out or the need to recover a broken drill bit

- 2.1.28 As stated within **Chapter 9: Water Environment [APP-018]** the bentonite within the drilling fluid is a naturally occurring mineral and enables the fluid to have sufficient viscosity to carry the cutting chips back to the surface machine whilst lubricating and keeping cool the drilling bit. Directional drilling, or other trenchless techniques, would be undertaken by a specialist contractor and the water column above the drill path would be continuously monitored during drilling. It should be noted that drill fluid leakage into a watercourse is not a common problem, particularly given the proposed depths. However, where there is an increased perceived risk (i.e. lack of drilling mud returns) the drilling/boring operation would be suspended, remediation action implemented, and subsequently the methodology for that crossing re-evaluated.
- 2.1.29 As stated within **Chapter 9: Water Environment [APP-018]** a site-specific hydraulic fracture (frac-out) risk assessment would be developed prior to construction following further investigation of specific ground conditions at the crossing locations, and appropriate mitigation developed in line with best construction practice. A frac-out risk assessment is secured by Requirement 12 (via the **Framework CEMP [REP4-035]**).
- 2.1.30 The risk of the need to recover a broken drill bit would be limited by undertaking ground surveys prior to any HDD activities to ensure the correct tool and additives are used to maintain a stable bore. Furthermore, if there are any issues associated with HDD under the River Trent this will be dealt with using the launch and receive pits, and therefore no access will be required to the River Trent.

Impacts on sediment dynamics and hydromorphology associated with a collapsed bore hole following removal of a drill

- 2.1.31 In terms of a collapsed bore hole, the risk of this occurring would be limited by the use of bentonite which would reduce this risk considerably. Furthermore, ground surveys to ensure the correct tool and additives are used to maintain a stable bore would also be undertaken prior to commencing the works.
- 2.1.32 As stated above a site-specific hydraulic fracture (frac-out) risk assessment would be developed prior to construction following further investigation of specific ground conditions at the crossing locations, and appropriate mitigation developed in line with best construction practice. A frac-out risk assessment is secured as a DCO requirement (via the **Framework CEMP [REP4-035]**).

Potential impact on groundwater flow and quality from piling and dewatering operations such as those associated with the need for coffer dams

- 2.1.33 There is potential for groundwater ingress to the pits. This would be managed following standard construction techniques potentially including pumping, damming or shoring up the pits with sheet piling. A temporary abstraction licence is required from the Environment Agency when abstracting more than 20 m³/day of water per day lasting less than 28 days. Any discharge of groundwater to the watercourse may also require a discharge consent from the Environment Agency if it is considered to be 'unclean' and the conditions of the Environment Agency's Regulatory Position Statement 'Temporary dewatering from excavations to surface water' (April 2021) cannot be met.
- 2.1.34 The pits would be backfilled with the original excavated material upon completion and would not affect groundwater flow or quality in the longer term. As such, no impediments to baseflow in the River Trent or small watercourses within the Order limits are anticipated.

Conclusion

- 2.1.35 Considering the low probability of issues arising associated with HDD during the construction and operation phase due to the extensive pre-planning which informs design, as well as the potential impacts and the mitigation already secured within the **Framework CEMP [REP4-035]** from a risk perspective it is considered that the probability of adverse effects from potential issues associated with HDD during the construction or operation phase is **extremely low and is therefore not significant**.

Bullet point 3: How would the Applicant address such an incident without carrying out works within the area that may be within the exclusion zone for the River Trent.

- 2.1.36 In the unlikely event that an incident did occur within the avoidance area, as stated within the **Framework CEMP [REP4-035]** there would be measures included within an emergency response plan that will be developed in consultation with the relevant local authority emergency planning officer as

well as the Environment Agency. The plan will detail the procedures for responding to incidents and emergencies on site, and any reporting.

- 2.1.37 First principles are for there to be no disturbance within the avoidance areas on the east and west sides of the River Trent. As set out above, the likelihood of access being required into these areas is extremely low. However, in exceptional emergency situations such as a need to recover a drill head, work may be needed within the avoidance areas. The Outline Design Principles [REP4-005] have been updated at D5 to reflect this approach.

Bullet point 4: Are such interventions if required covered by the Deemed Marine Licence or would further description need to be included within the DML.

- 2.1.38 Yes the activities would be authorised by the Deemed Marine Licence (DML).
- 2.1.39 The licensed activities in paragraph 3(2) of Part 1 of the DML are works to lay one 400kV cable circuit, including tunnelling, boring and drilling works for trenchless crossings – this aligns with the description in sub-paragraph (i) of Work No. 4B in Schedule 1. The DML purposely omits references to the works set out in sub-paragraphs (ii) and (iii) of Work No 4B in Schedule 1 (for example the laying down of access tracks or construction and decommissioning compounds) to give the MMO comfort (following feedback) that the Applicant does not intend for these works to be located within the tidal extent of the River Trent.
- 2.1.40 Nevertheless, the authorisation in paragraph 3(2) is further expanded upon in paragraph 3(3) which states that the authorised activity includes the construction, maintenance, operation and decommissioning of those elements of Work No. 4B plus any further associated development (as listed in Schedule 1), which are located within the River Trent (with references to the coordinates provided). This wording provides flexibility as to the works to be carried out under the DML for the lifetime of the Scheme, subject to the conditions in Part 2, and would enable the licensee to carry out interventions if required.
- 2.1.41 Therefore, in the unlikely scenario of an HDD failure requiring interventions to be carried out in the tidal extent of the River Trent (e.g. to recover a drill head), either during construction, maintenance, operation or decommissioning, these works are permitted by paragraph 3(2) of the licence. It should be noted that the extent of any such works are likely to be very limited. If necessary, to enable the Applicant to carry out interventions, compounds would be located outside of the coordinates of the DML and be subject to the other constraints of the draft DCO (e.g. the Outline Design Principles) and the controls contained within the Framework CEMP [REP4-35], Framework OEMP and Framework DEMP [REP4-37], each of which specify construction management and pollution prevention measures in relation to works and maintenance near water; control of water pollution from construction sites; plant, machinery and material controls and set back distances; and earthwork management, water quality monitoring and working in the Flood Zone requirements.

- 2.1.42 If necessary to give further confidence that necessary procedures would be in place, the Applicant would be willing to incorporate an additional marine licence condition relating to an emergency response plan, similar to that provided for in the Framework CEMP. For example, the following wording could be included:

New condition 9(4) of Part 2 of the DML:

“At the same time as providing notification pursuant to sub-paragraph (1), the licensee must provide the MMO with an emergency response plan for responding to incidents and unforeseen interventions in carrying out the marine licenced activities”.

It is noted that maintenance activities are already controlled via a maintenance plan pursuant to condition 14.

Bullet point 5: The MMO has suggested the Applicant could apply for a standard Marine licence if the previously suggested exemption was not available at the point of construction how would this affect the Applicant’s development timetable in terms of time and cost in a standard HDD operation where no incidents arose. Also if such a scenario as described above in the context of failure of the drilling or cabling arose to what extent would a requirement to apply for a Marine Licence add to the delay and potential costs and would this affect the viability of the scheme.

- 2.1.43 In both scenarios, if the DML is not granted and the exemption was not available, the Applicant would apply for a marine licence pursuant to the Marine and Coastal Access Act 2009 prior to construction. The application would be for the carrying out of the HDD works, plus construction, maintenance, operation and decommissioning activities to ensure that any works to install the HDD below the tidal extent of the River Trent (including in the event of interventions being required), as provided for in the DML.
- 2.1.44 This would be an unnecessary administrative burden on the Applicant, and create uncertainty, contrary to the “one stop shop” intention of the DCO regime for nationally significant infrastructure projects, and could reasonably be expected to lead to a delay, because there are no statutory timescales for the MMO to determine a marine licence application. The MMO’s guidance (Ref. 1) states that the MMO aims to make a decision on most applications within 13 weeks of the application being validated, noting that some applications may take longer or shorter. For example, Abp Lowestoft-Commercial Road (MLA/2021/00190/1) submitted an application 16 April 2021 with an initial decision made 03 November 2021 (28 weeks); West Sussex County Council (MLA/2023/00110) submitted an application 10 March 2023 with an initial decision made 17 November 2023 (36 weeks); Southern Water Services Limited (MLA/2022/00560) submitted an application 20 December 2022 with an initial decision made 14 November 2023 (47 weeks); and Diamond Transmission Corporation Limited (MLA/2022/00488/1) submitted an application 04 November 2022 with an initial decision made 16 June 2023 (32 weeks).

- 2.1.45 The Applicant notes the lack of certainty of timescales associated with the marine licensing process, which is one of the key benefits of the DCO regime, and the Applicant assumes, the underpinning rationale for the addition of S149A of the Planning Act 2008 which enables a DML to be granted as part of a DCO.
- 2.1.46 It is noted that offshore wind developers regularly apply for DMLs as part of their DCO, to ensure the timely delivery of their NSIP schemes, without having to unnecessarily rely on a separate and sequential licensing process. The Applicant is not aware of any offshore wind DCO which has been granted which does not include the DMLs sought.
- 2.1.47 Likewise, the Cleve Hill Solar Farm Order 2020 includes a DML for flood defence works, which could have been applied for separately but was more efficiently included within the DCO. It is noted that in relation to that Scheme, it appears the MMO's preference was for a DML to be included rather than reliance on statutory exemptions benefiting the Environment Agency, e.g. paragraph 4.132 of the Secretary of State's decision letter (Ref. 2) states:
- "The Marine Management Organisation suggested that a deemed Marine Licence would be the most appropriate way to deal with those parts of the proposed Development – the flood defences – that extended below the Mean High Water Mark rather than pursuing an option transferring existing Marine Licence exemptions held by the Environment Agency to the Applicant."*
- 2.1.48 In the Statement of Common Ground between the MMO and the Cleve Hill undertaker (Ref. 3), it was agreed that *"The MMO does, support at Part 6, 29 of the dDCO the inclusion of a deemed marine licence under the 2009 Act."* In that same document, the MMO (see page 3) confirmed *"The MMO agrees with the content of the draft DML conditions"*. It is noted that the DML conditions proposed by the Applicant mirror the DML conditions granted as part of the Cleve Hill DCO and there is no good reason that a different approach to licensing should be taken here.
- 2.1.49 The MMO's role in the DCO process, including administering DMLs post-consent, is also recognised in their guidance on NSIPs (Ref. 4) which states:
- "If a development consent order (DCO) is granted, this may include provision deeming a marine licence to have been issued under Part 4 of the Marine and Coastal Access Act 2009. The MMO is responsible for enforcing, post-consent monitoring, varying, suspending, and revoking any deemed marine licence(s) as part of the DCO."*
- 2.1.50 It is therefore clear that there is an ability for the DCO to include the DML requested, that there are clear benefits in terms of certainty and programme for the NSIP in doing so, and the MMO would retain a key role in the process including as regulator of the licence. All of this has been provided for in the DML, which in any case only applies to activities if the exemption does not (paragraph 3(1)(b) of the DML). It would not be in the public interest of good administration to postpone the decision on the grant of a DML to a later stage of the Scheme.

- 2.1.51 Notwithstanding the above and whilst such a delay could negatively affect project programme, it would not result in a delay or cost to such an extent it would affect the viability of the Scheme.

Bullet point 6: The MMO to comment specifically on how the abovementioned failure scenario would affect its position in respect of the necessity for a DML and any conditions that would be required and whether such ancillary activities would be covered by the previously identified exemption.

- 2.1.52 The Applicant will review the MMO's response to this item and respond accordingly and if necessary, at Deadline 6.

Bullet point 7: Should the dDCO not include a Deemed Marine Licence what would the MMO's expected decision time on an application for a standard marine licence be.

- 2.1.53 As noted above, there is no statutory timescale for determining a marine licence application pursuant to the Marine and Coastal Access Act 2009 and an indicative timescale of 13 weeks from application validation is commonly provided.

3. Summary

- 3.1.1 In summary, the potential for HDD and cabling issues has been considered in the Environmental Statement within **Chapter 9: Water Environment [APP-018]**.
- 3.1.2 A Risk Assessment has been provided which concludes that from a risk perspective it is considered that the probability of adverse effects from potential issues associated with HDD during the construction or operation phase is **extremely low and is therefore not significant**.
- 3.1.3 If there was an issue with the HDD within an avoidance area this would be dealt with via unplanned event launch and receive pits, and therefore no access would be required to the River Trent.
- 3.1.4 The DML has been drafted to license works to lay one 400kV cable circuit plus associated development, and is therefore sufficiently flexible to authorise interventions in the highly unlikely event they occurred.
- 3.1.5 There are clear benefits in including the DML in terms of certainty and programme for the NSIP and it would not be in the public interest of good administration to postpone the decision on the grant of a DML to a later stage of the Scheme.

References

- Ref. 1 MMO (2023) Guidance: Make a marine licence application. Available at: <https://www.gov.uk/guidance/make-a-marine-licence-application>
- Ref. 2 Department for Business, Energy & Industrial Strategy (2020) Application for the Cleve Hill Solar Park Order, Secretary of State Decision Letter. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-001956-200528%20EN010085%20CHSP%20Secretary%20of%20State's%20Decision%20Letter.pdf>
- Ref. 3 Cleve Hill Solar Park Ltd (2019) Progressed Statement of Common Ground between Cleve Hill Solar Park Ltd and the Marine Management Organisation. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-000907-Cleve%20Hill%20LTD%20-%20AS%20-%20MMO%20SOCG%20July%202019.pdf>
- Ref. 4 MMO (2023) Marine Licencing: Nationally Significant Infrastructure Projects. Available at: <https://www.gov.uk/government/collections/marine-licensing-nationally-significant-infrastructure-projects>