



Marine
Management
Organisation

Marine Development
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0) 300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Andrew Mead
The Planning Inspectorate
(via email only)

Your reference: EN070001
Our reference: DCO/2013/00019

16 December 2014

Dear Mr Mead,

**PROPOSED YORKSHIRE AND HUMBER CARBON CAPTURE TRANSPORTATION
AND STORAGE (CCS) CROSS COUNTRY PIPELINE DEVELOPMENT CONSENT
ORDER: RESPONSE TO DEADLINE I**

The Marine Management Organisation (MMO) is an interested party for the examination of Development Consent Order (DCO) applications for Nationally Significant Infrastructure Projects (NSIP) in the marine area.

Please find enclosed as an appendix the MMO's response to the Examining Authority's first round of written questions dated 25 November 2014.

Please note that the MMO reserves the right to make further comments on this application throughout the examination process and to modify its present advice or opinion in view of any additional information that may come to our attention.

Yours sincerely,

[Redacted signature]

Matthew Kinmond
Marine Licensing Case Manager (Offshore)

D +44 (0)191 376 2526
E matthew.kinmond@marinemanagement.org.uk

Copies to:

Robin Mace Snaith (MMO)
Phil McBryde (MMO)
Liz Wells (National Grid Carbon Ltd)
Richard Gwilliam (National Grid Carbon Ltd)



INVESTORS
IN PEOPLE

Enclosed:

Appendix 1 – MMO response to Examining Authority’s First Written Questions dated 25 November 2014

Appendix 1

Ref No.	Respondent:		MMO response:
Q3.30	Applicant Marine Management Organisation (MMO)	<p>Para 4.6.11 of the NSER states that <i>“monitoring of sediment trapping and any notable downdrift sediment starvation would be in accordance with the construction and monitoring programme to be agreed with the MMO as a condition of the Deemed Marine Licence”</i>. It is noted that condition 10 of the DML requires “monitoring of suspended sediment concentrations in seawater within the jetting area and at a suitable control location, should jetting be used for pipeline installation”. Can the applicant and MMO comment on whether monitoring is required should alternative methods be used for pipeline installation, and if so, can the DML be amended accordingly?</p>	<p>Further clarification is required from the applicant on whether alternative methods of pipeline installation are proposed to be used other than jetting.</p> <p>In comparison to other methods of pipeline installation (such as ploughing) jetting fluidises the seabed, resulting in increased suspended sediment concentration levels. Fluidisation of the seabed results in the agitation of sediments into the water column for prolonged periods of time. The sediments suspended in the water column then have the capacity to be transported over long distances, increasing the potential interaction with receptors. Monitoring may therefore be required to monitor these increases in suspended sediment.</p> <p>The condition should read ‘reference site’ rather than ‘control location’, as it is not possible to control the marine environment.</p>

<p>Q12.42</p>	<p>Applicant</p>	<p>Part 1 of the DML does not contain a definition of maintenance, as maintenance is licenced at 2(c). The applicant should consider whether a definition is required in the DML. The MMO may also wish to comment on this. In 2(3)(b) the DML authorises licenced activities to be carried out anywhere within the order limits below the mean high water spring tide. Can the applicant explain why this is necessary and why the area cannot be identified by co-ordinates?</p>	<p>A definition of maintenance should be provided within Part 1 of the DML.</p> <p>The applicant should also submit a maintenance audit document in advance of the completion of the construction work. This requirement should also be conditioned within the DML.</p> <p>The maintenance audit document should use a traffic light system setting out which maintenance activities have been assessed within the ES and which have not. Where an activity has not been assessed within the ES, further discussion will be required with the MMO, to agree a course of action that may require a separate marine licence.</p> <p>In relation to the question regarding licensable activities to be carried out anywhere within the order limits below the mean high water spring tide, the MMO awaits the applicant's response, before providing any further comment.</p>
----------------------	------------------	--	--