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Dear Sir/Madam

**Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 –Rule 8 and 9, 10, and 17**

**Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an Order Granting Development Consent for the Outer Dowsing Offshore Wind Project**

Following the Planning Inspectorates Rule 8 letter dated 17<sup>th</sup> October 2024 the County Council submits its written representation in respect of this application. The Council provided initial comments in relation to this application in its Relevant Representation response on June 2024.

This written representation provides the Council's updated position following consideration of the application by the Council's Planning and Regulation Committee on 7<sup>th</sup> October 2024. This followed a Committee site visit which took place on Thursday 3<sup>rd</sup> October when members of the Committee visited the sub-station location, the cable corridor route, landfall point and were able to view the current windfarms off the Lincolnshire coast near Anderby Creek.

This written representation has been prepared in accordance PINS advice note 8.4 and should be read in conjunction with the Council's Local impact Report submitted by the Council for deadline 1 as well. The Local Impact Report was brought to the Council's October Planning Committee when it was resolved to approve the Impact Report for submission. Based on the findings of this impact report the Council resolved to submit a **formal objection** to the application on the following grounds:-

The project would produce 1500MW clean renewable energy that would support the nations transition to a low carbon future, deliver significant biodiversity net gain benefits through the creation of mitigation and enhancements as well proposing that the connection from the offshore wind farm to the National Grid connection point is by underground cable. At this time these positive benefits are not outweighed by the negative, impacts that arise

given the overall size and scale of the development both on its own and in combination with the other NSIP scale infrastructure projects proposed in this geographical area as follows:

- There is a tension in relation to best and most versatile agricultural land (BMV) given that the majority of the 850 hectares covered by the Order Limits is classed as BMV land. For the vast majority of this land the loss will only be temporary for the construction period and the restoration period following the construction phase. To ensure that the restoration of the land is carried out to the required standards in order that it does not suffer from long-term deficiency the recommendations set out by the Councils Agricultural consultant need to be fully captured in the DCO together with an additional requirement for a Soil Management Plan to be submitted and approved by the relevant planning authority. The applicant should agree to the funding of an independent Agricultural Officer/Consultant for the construction period and 5 year after care period. The National Policy Statements direct that previously developed land, brownfield land, contaminated land, industrial land and non-BMV land should be developed as a preference, and Local Plan policies also seek to protect the best and most versatile agricultural land so as to preserve opportunities for food production and the continuance of the agricultural economy.

The vast majority of the BMV land affected by the application proposals will be temporary lost but 26 hectares of Grade 1 land will be lost permanently to accommodate the proposed on-shore sub-station. A **permanent and negative** impact is identified as a consequence of the loss of best and most versatile land. This loss is not only at a local level but significant when considered in combination with the loss of land from other NSIP scale developments that are also being promoted and consented across Lincolnshire contrary to the Written Ministerial Statement of 15 May 2024.

- By reason of its mass and scale, the proposed development would lead to significant adverse effects upon landscape character and visual amenity. The development has the potential to transform the local landscape by altering the character on a large scale, which is likely to be exacerbated by the fragmented nature of the cable route spread over a wide area. There is a particular concern about the effects upon the landscape character through changes to the land use, which would be spread throughout a wide area. Whilst this impact is inevitably for a project of this nature and to some extent recognised by the National Policy Statements it is considered that more information should be provided and further details of the sub-station confirmed which may offset some of the current concerns regarding the impact of the development on the landscape. In addition some resource contribution to an Ecological Compliance Officer together with further details outlined above would go some way to addressing the current negative impact of the development in respect of landscape and visual impact. However, the cumulative impact when considered with the other emerging NSIPs in this area remains negative.

- Due to the level of uncertainty as a result of the restricted amount of trial trenching that has been undertaken across the Order Limits there is a distinct possibility that archaeological remains of more than local/regional significance could be disturbed and damaged. Consequently at this time it is not possible to adequately assess the impacts on such assets and therefore there is a negative impact of the development in respect of the impacts on as yet unknown heritage assets within the Order Limits area.
- From a highways perspective whilst as a standalone project, subject to clarification and commitments that need to be secured through the DCO and the appropriate Outline Management Plans, there is no objection to the application. The biggest concern is that there is a high probability that this construction period could overlap with the other NSIP projects in the area which would potentially lead to a worst case scenario for traffic levels to exceed current levels by up to 40%. Should this occur at any time but particularly during the holiday season the highway network could not accommodate such levels of traffic. Therefore, it will be necessary to come up with a mechanism that ensures this can be managed in a way that will prevent significant construction phase overlaps taking place or consider significant highway improvements that will provide the highway network with additional capacity to absorb such increases in traffic numbers. Until details of what these mechanisms will be or a commitment to fund significant upgrades to the local highway network then an **objection** is raised to the application on potential cumulative highway impacts from the development with other developments that are emerging.
- In respect of ecology the applicant has predicted a series of potential impacts on onshore ecology during the construction stage of the development ranging from minor adverse impacts to significant adverse impacts depending on the species, habitat or site concerned. Measures to address these impacts are proposed and should be secured in the DCO. If the mitigation measures including the establishment of an ecological steering group, Ecological Compliance Officer and Ecological enhancement fund are secured using appropriate Section 106 funding are forthcoming the Council considers that the development would have a **minor negative impact** on onshore ecology and not compromise relevant National and Local Plan policy. Without the commitments to a steering group and Ecological Compliance Officer the Council would wish to raise an objection to the impacts on ecology and to the achievability of the Biodiversity Net Gains proposed. However, in receipt of further information and confirmation of the funding of this Officer through a Section 106 agreement this objection could be removed.
- The impact of the development on the tourism industry is seen as the biggest concern from a socio-economic perspective. During the construction phase is considered to be the greatest potential to cause a negative impact on the local tourism industry. During the construction period visitors may be deterred from undertaking visits, such as to coastal resorts, recreational routes, and to beaches. This would occur either due to the setting of these being changed by visual

impacts from onshore and offshore construction works, or from changes to the general perception of the area as a visitor location. This could result in loss of income and the jobs this supports. Construction phases should avoid peak visitor attraction time, when the visitor economy provides employment and income for local communities. In particular 'bad press' about congestion, additional HGVs etc can have a big impact on the number of visitors who come to the area, and this must be taken into account when planning the scheme. At this time without commitment to a tourism strategy and action plan setting out measures to address this concern and makes provision for appropriate funding for loss of income during these construction works for affected businesses an holding objection is raised.

Without prejudice to the decision of the Secretary of State to grant the Development Consent Order a Section 106 Agreement should be entered into by the developer with the County Council in respect of the following matters.

- Funding of Environmental Compliance Officer
- Landscape and ecology enhancement fund
- Archive deposition, archives provision and storage enhancement
- Treasure Acquisition Budget
- Tourism strategy and action plan to support local visitor economy and mitigate the impact of the proposed development on the tourism sector
- Outreach interpretation and public benefit package.
- Agricultural Specialist

In conclusion whilst the Council currently objects to the proposed development on a number of grounds, the Council will continue to engage with the applicant and Examining Authority throughout the examination period in an attempt to resolve as many as these concerns as possible by the close of the examination.

Yours faithfully

**Neil McBride**  
**Head of Planning**