

Local Impact Report

Interested Party Reference number: 20049041, 20049038 and 20049036

On behalf of East Lindsey District Council, Boston Borough Council, South Holland District Council

Submitted 23rd October 2024

1. Introduction

This Local Impact Report (LIR) has been provided on behalf of East Lindsey District Council, Boston Borough Council and South Holland District Council. This joint LIR aims to provide details of the impact of the proposed Outer Dowsing Offshore Wind project within the boundaries of the three local authorities. Where necessary this report clarifies if an impact is shared or site specific with relevance to one local authority.

This LIR is based on the guidance as set out within S60(3) of the Planning Act 2008 (as amended) and the Planning Inspectorate's Local Impact Report Advice Note.

Previously representations for all three Councils have been submitted as well as confirmation of the adequacy of consultation. Currently a draft Statement of Common Ground (SOCG) is in review with the Applicant and we have made comments on this document.

All three Councils reserve the right to amend or supplement the content of the following LIR should it become necessary, for example if updated information is submitted or the SOCG amended.

This LIR's primary purpose is to identify the policies in Local Plans as far as they are relevant to the proposed development and the extent to which the development accords with these policies. It does this under topic-based headings (following the form of the overarching National Policy Statement (NPS) for Energy (EN-1)) reflecting the likely nature of impacts. The key issues for the local authorities and the local communities are then identified, followed by commentary on the extent the applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.

The Site Area

The site for review within the scope of this report starts at the landfall position of the subsea cable route at Anderby Creek and ends at the substation located at Surfleet Marsh Here with over 70km of land within the local authorities boundaries affected by the development.

East Lindsey District Council is the most northerly of the local authorities and here the landfall position at Anderby Creek and cable route affect the area.

Boston Borough Council is the next local authority south of East Lindsey and here the majority of proposed development includes underground cable routing.

The last and most southerly local authority is South Holland District Council which is impacted by both underground cable works and the proposed termination at the newly erected substation.

There are other associated works to facilitate the development which are considered in the following sections of the report. These include temporary construction compounds and access routes amongst other elements.

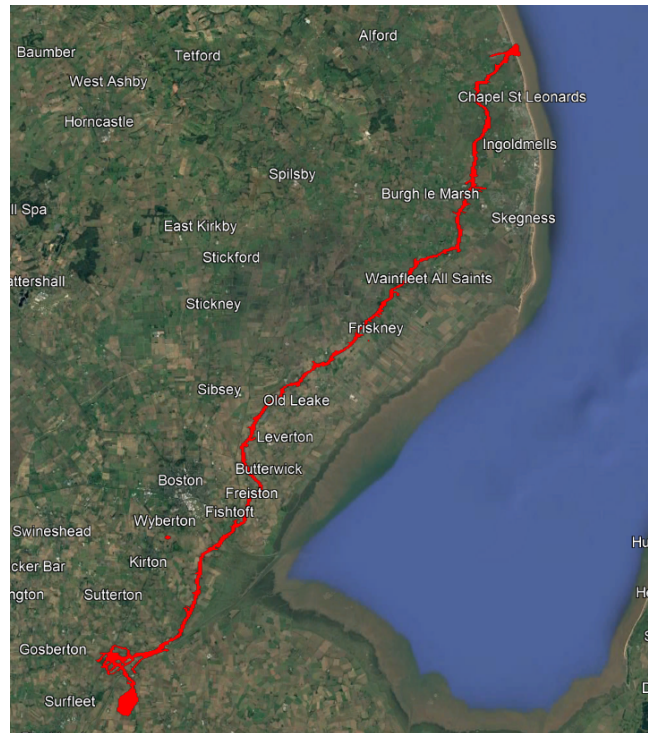


Figure 1.1: DCO Application onshore extent

Whilst the application has been sub sectioned this LIR considers the impacts as a whole from landfall within the East Lindsey boundary, the cable route south east out of East Lindsey and through Boston, to the final cable route and substation located in South Holland’s boundary.

2. Statutory Development Plans

There are a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

East Lindsey District Council

The Local Plan for East Lindsey comprises the Core Strategy 2018 and the Settlement Proposals Document 2018. The relevant objectives and policies within the East Lindsey Local Plan (ELLP) are:

Vision and Objective 1 - Seeks a network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment.

Vision and Objective 3 - Seeks a growing and diversified economy that not only builds on and extends the important agriculture and tourism base but supports the creation of all types of employment.

Vision and Objective 6 - Seeks a commitment to tackling the causes and effects of global climate change through local action.

Vision and Objectives Para 1.11 - Seeks to achieve the vision of a commitment to tackling the causes and effects of global climate change through local action, Support is provided for new development to ensure it does not cause flood risk to existing properties and encourage new development to reduce flood risk to existing properties.

Vision and Objectives Para 1.11 - Supports the use of renewable energy but balanced against the protection of the District's distinct landscapes.

Strategic policy 10 (SP10) – Design - Development around water sources will only be supported if it contains adequate protection preventing pollution from entering into the water source.

Strategic policy 11 (SP11) – Historic Environment - The Council will support proposals that secure the continued protection and enhancement of heritage assets in East Lindsey, contribute to the wider vitality and regeneration of the areas in which they are located and reinforce a strong sense of place.

Strategic policy 13 (SP13) – Inland Employment - The Council will support growth and diversification of the local economy by: Strengthening the rural economy by supporting in the large, medium and small villages: Development where it can provide local employment.

Strategic policy 16 (SP16) – Inland Flood Risk - The Council will support development that demonstrates an integrated approach to sustainable drainage that has positive gains to the natural environment. The Council will support development for business, leisure and commercial uses in areas of inland flood risk where it can be demonstrated that accommodating the development on a sequentially safer site would undermine the overall commercial integrity of the existing area. Such developments must incorporate flood mitigation measures in their design.

Strategic policy 17 (SP17) – Coastal East Lindsey - All relevant development will need to provide adequate flood mitigation. The council will support improvements to flood defences, infrastructure

associated with emergency planning and the development and replacement community buildings. Development must also demonstrate that it satisfies the Sequential and Exception Test and will need to provide adequate flood mitigation.

Strategic policy 21 (SP21) – Coastal Employment - The Council will support the rural coastal economy by supporting development in the large, medium and small villages where it: Provides local employment and help support local services.

Strategic policy 23 (SP23) – Landscape - The District’s landscapes will be protected, enhanced, used and managed to provide an attractive and healthy working and living environment. Development will be guided by the District’s Landscape Character Assessment and landscapes defined as highly sensitive will be afforded the greatest protection.

Strategic Policy 24 (SP24) - Biodiversity and Geodiversity - Development proposals should seek to protect and enhance the biodiversity and geodiversity value of land and buildings and minimise fragmentation and maximise opportunities for connection between natural habitats.

Strategic Policy 25 (SP25) – Green Infrastructure - In the case of sites not identified on the Inset Maps, development will only be permitted on open spaces provided unacceptable harm will not be caused to their appearance, character or role.

Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy Large-scale renewable and low carbon energy development, development for the transmission and interconnection of electricity, and infrastructure required to support such development, will be supported where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to:

- residential amenity;
- surrounding landscape, townscape and historic landscape character, and visual qualities;
- the significance (including the setting) of a historic garden, park, battlefield, building, conservation area, archaeological site or other heritage asset;
- sites or features of biodiversity or geodiversity importance, or protected species;
- the local economy;
- highway safety; and
- water environment and water quality

Strategic Policy 28 (SP28) – Infrastructure and S106 Obligations - Infrastructure schemes will be supported provided they are essential in the national interest; contribute to sustainable development, and respect the distinctive character of the district.

Boston Borough Council & South Holland District Council

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019.

The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

Policy 2 ‘Development Management’ – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.

Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.

Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.

Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.

Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.

Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:

- health and safety of the public;
- the amenities of the area; or
- the natural, historic and built environment;

by way of:

- air quality, including fumes and odour;
- noise including vibration;
- light levels;
- land quality and condition; or
- surface and groundwater quality.

Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:

- impact on the proposed development from poor air quality from identified sources;
- impact on air quality from the proposed development; and
- impact on amenity from existing uses.

Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.

Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.

Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

3. Impact Assessment

The Local Impact Report guidance indicates this report should provide a statement of positive, neutral and negative local impacts but should not contain a balancing exercise, as that is for the Examining Authority to determine. The existing statutory consultation responses should be read in conjunction with this LIR as well as the SOCG once agreed.

The onshore Order Limits include the landfall compound at Wolla Bank, the onshore export cable corridor (Onshore ECC), within which onshore export cables will be placed, the Project's onshore substation (OnSS) at Surfleet Marsh, and the 400kV cable corridor between the OnSS and the National Grid substation (NGSS).

The key elements of the development with the potential for impact have been identified as :

- Landfall location at Wolla Bank
- Onshore export cables between Wolla Bank and Western Marsh
- Cable corridor of 80m during construction and 60m post construction
- Onshore Substation
- Temporary construction compounds for laydown and storage of materials, plant and staff, as well as space for small temporary offices, welfare facilities, security and parking.
- A temporary haul road will be constructed to provide access to the Project's onshore infrastructure instead of relying on the main roads. The temporary haul road, typically 6.8m wide (up to 9m at passing places) will limit damage to the agricultural land and reduce construction traffic on the main road networks. This will extend the entire length of the Project onshore ECC and 400kV cable corridor (except where the Project has committed to not construct a haul road, such as in locations where trenchless techniques will be adopted).
- An onshore construction program of around 4 years for landfall and substation works with 3 years for the cable ducting and installation.

The Potential Positive Impacts of the Proposal are:

- Socio-economic factors during construction; and
- Provision of renewable energy supply.

The Potential Neutral Impacts of the Proposal are:

- Underground cable route;
- Air quality and dust management depending on mitigation;
- Landscape and visual impact;
- Noise and vibration;
- Socio economic factors once construction is complete;
- Traffic and transport, subject to LCC agreement; and
- Waste management, subject to LCC agreement.

The Potential Negative Impacts of the Proposal are:

- Air quality and dust management depending on mitigation;
- Biodiversity subject to Lincolnshire Wildlife Trust (LWT) and Natural England (NE) agreement;

- Dust, odour, artificial light, smoke, steam, insect infestation, subject to Lincolnshire Fire and
- Rescue agreement; and
- Historic Environment, subject to Lincolnshire Heritage (LH) and Historic England (HE) agreement.

The following sections identify the relevant policies within the development plan, the key issues raised by the proposed development and the extent to the applicant addresses them and thus the proposal complies with local policy. For ease of reference, the headings broadly reflect those used in Part 5 of the overarching NPS for Energy (EN-1) 'Generic Impacts'.

Air Quality and Emissions

Local Plan Policy

Whilst the associated text of the ELLP states the importance of air quality with regards to residential amenity and quality of life (Page 11), the Core Strategy does not set out a specific policy with regards to Air Pollution.

The SELLP sets out the local policy position with regards to air pollution at Policy 30.

Commentary

Air quality will be impacted during construction from the generation of dust during the cable installation. Dust travelling (wind-blown) can then have wider impacts within land nearby the cable corridor. As approximately 70km of cable is proposed across the development area, a suitable mitigation and management plan is required in order to minimise the onward impact. All three Local Authorities consider air quality as a key consideration to maintaining residential amenity quality of life and are aware of representations made from landowners including farmers who have expressed concern about the potential impact of dust on their crop production.

Adequacy of the application

Air quality has been directly assessed within chapter 19 of the submitted Environmental Statement as well as the Outline Air Quality Management Plan. Chapter 19 reviews the impacts during construction with regards to soil works and vehicle movements whilst the Outline Air Quality Management Plan

It was noted at the recent meeting that landowners are concerns regarding the impacts of dust and therefore the robustness of the management plan is key with regards to ensuring the mitigation of impacts. As stated within Table 2.1 of the Outline Air Quality Management Plan, communications will play a highly important role in the management and mitigation of dust emissions. The measures as listed in Table 2.1 are deemed robust and compliant with Local Policy, however an ongoing line of communication is needed to ensure the measures are adhered to for the protection of air quality.

Biodiversity and Geological Conservation

Local Plan Policy

The ELLP at Strategic Policy 24 (SP24) sets out the policy for Biodiversity and Geodiversity. It states that Development proposals should seek to protect and enhance the biodiversity and geodiversity value of land and buildings and minimise fragmentation and maximise opportunities for connection between natural habitats.

The SELLP at Policy 28 requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.

Commentary

Local biodiversity impact will be from site clearance of any vegetation on the cable route corridor and the loss of agricultural land at the substation. The impact on biodiversity is potentially negative as a result of this loss.

Adequacy of the application/DCO

Chapter 21 of the submitted Environmental Statement details Onshore Ecology. No technical errors have been identified that would lead to the challenge of ES Chapter 21. The chapter is coherent and adopts a robust methodology. The chapter is therefore considered adequate for the Examination Authority to assess the ecology impacts associated with the construction, operation and decommissioning of the proposed development.

Flood Risk

Local Plan Policy

The ELLP sets out the policy for Inland Flood Risk at Strategic Policy 16. The Council will support development that demonstrates an integrated approach to sustainable drainage that has positive gains to the natural environment. The Council will support development for business, leisure and commercial uses in areas of inland flood risk where it can be demonstrated that accommodating the development on a sequentially safer site would undermine the overall commercial integrity of the existing area. Such developments must incorporate flood mitigation measures in their design.

The SELLP contains Policy 4: Approach to Flood Risk (See Appendix 3). Essential infrastructure is referred to in paragraph 2. The issue is also featured in Policy 2: Development Management (See Appendix 1), Policy 3: Design of New Development (See Appendix 2), Policy 28: Natural Environment (See Appendix 4), Policy 30: Pollution (See Appendix 6) and Policy 31: Climate Change and Renewable and Low Carbon Energy (See Appendix 7).

Commentary

The maximum design scenario (MDS) has been considered for the assessment of impacts. The MDS includes the maximum development footprint (temporary and permanent) and therefore the largest possible area of disturbance to surface water features. Open trenching as a crossing option for smaller watercourse crossings has been considered to represent the greatest potential for change to surface hydrology and effect on water quality.

Adequacy of the application

Flood risk has been assessed within Chapter 24 of the submitted Environmental Statement. No technical errors have been identified that would lead to the challenge of ES Chapter 24. The chapter is coherent and adopts a robust methodology. The chapter is therefore considered adequate for the Examination Authority to assess the ecology impacts associated with the construction, operation and decommissioning of the proposed development. Lincolnshire County Council act as Lead Local Flood Authority and may comment directly on the proposed development.

Historic Environment

Local Plan Policy

The ELLP Strategic policy 11 (SP11) Historic Environment is relevant to this impact topic area. The Council will support proposals that secure the continued protection and enhancement of heritage assets in East Lindsey, contribute to the wider vitality and regeneration of the areas in which they are located and reinforce a strong sense of place.

The SELLP contains Policy 29: The Historic Environment. Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.

Commentary

Construction traffic through the conservation area of Wrangle has not been approved. The type of historic environment that will be impacted in some way by the proposal is archaeology. The impact on archaeology could be potentially negative or potentially neutral. This is currently unclear owing to the cable route not having completed trial trench investigation and having the results available to inform the mitigation strategy.

Adequacy of the application

Chapter 20 of the Environmental Statement details onshore archaeology and cultural heritage impacts and identifies a number of heritage assets within a certain proximity of the Order Limits. This reveals that the cable route corridor and substation has heritage setting assessments, archaeology desk based assessments and a mitigation strategy has been prepared although trial trench evaluation has not been completed. The chapter is supported by appendices.

The Council acknowledges that Historic England, Heritage Lincolnshire and LCC are the expert bodies for this issue and the adequacy of the evidence.

Landscape and Visual

Local Plan Policy

Policies from the SELLP which are relevant to landscape and visual impacts are: Policy 3: Design of New Development and Policy 31: Climate Change and Renewable and Low Carbon Energy – particularly part B which refers to consideration of visual amenity, residential amenity and landscape character.

Policies from the ELCS which are relevant to landscape and visual impacts are: Strategic Policy 10 (SP10) – Design, which makes reference to maintaining and enhancing the character of the district, utilising appropriate landscaping and protecting amenity. Furthermore, it requires consideration of layout, scale, massing, height and density to reflect the character of the surrounding area. Strategic Policy 23 (SP23) – Landscape sets out requirements to protect and enhance the district’s landscape. Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy sets out requirements for large scale renewables projects, including transmission to weigh the impacts on landscape / townscape character and visual qualities against the benefits of the development.

Commentary

Long term landscape and visual impacts arising from the development are anticipated to primarily relate to the OnSS element. Embedded mitigation measures (see figure 28.15), including on and off-site planting are considered likely to be effective in mitigating for landscape and visual impacts from the OnSS as indicated in visual representations included within Chapter 28. Impacts relating to the landfall and cable route are anticipated to primarily be temporary, occurring during the construction phase.

Adequacy of the application

Chapter 28 of the ES forms the Landscape and Visual Impact Assessment, and associated figures was submitted in April 2024 following consultation in June, September and November 2023 during which the scope of the assessment, including landscape receptors, viewpoint locations and resultant visual receptors were agreed. During this process all consultation responses were addressed and the submitted Landscape and Visual chapter appropriately incorporated these elements. The Landscape and Visual Chapter is considered adequate for the Examination Authority to begin assessing the impact of the proposal.

Noise and Vibration

Local Plan Policy

Whilst the ELLP does not include a direct policy on noise and vibration, protection of amenity is considered in both Policy SP10 and SP27.

The SELLP contains Policy 30: Pollution It considered noise including vibration as well as other issues.

Commentary

There is the potential for construction and operational noise and vibration to impact on human health and result in a negative impact.

Adequacy of the application

Chapter 26 of the Environmental Statement details Noise and Vibration impacts. The chapter is coherent and adopts a robust methodology. The chapter is therefore considered adequate for the Examination Authority to assess the ecology impacts associated with the construction, operation and decommissioning of the proposed development.

Socio-Economic Impacts

Local Plan Policy

The ELLP Policy 13 (SP13) and Policy 21 (SP21) seek to encourage the strengthening of the rural economy by supporting development where it can provide local employment.

The SELLP does not have a single policy that considers this issue. However, Policy 31: Climate Change and Renewable and Low Carbon Energy does relate to this issue in part owing to it supporting renewable energy development. As a consequence, it encourages economic activity through the construction of such schemes and with its links to mitigating climate change ameliorates societal impact

Commentary

The assessment does the minimum amount required to be considered acceptable. The economic methodology relies on single, unexplained assumptions to which it applies basic methodologies. However, it is unlikely that any further details provided would change the overall assessment of significance due to the large size of the Economic Impact Study Area.

Adequacy of the application

Chapter 29 of the Environmental Statement reviews the socio-economic impacts. We will continue to work with the Developer to consider the socio-economic impact of the proposal and we are requesting areas of clarification but consider the information adequate for the Examination Authority to begin assessing the impact of the proposal on these issues.

Traffic and Transport

Local Plan Policy

The ELLP at Policy 22 (SP22) sets out the criteria for transport and accessibility for development within the district. The SELLP Policy 2: Development Management considers this issue under criterion 4.

Commentary

Regarding the traffic and transport impacts we would adopt the position of Lincolnshire County Council Highway Authority.

Adequacy of the application

Lincolnshire County Council act as highways Authority and may comment directly on the proposed development. Having reviewed the information put forward, the approach taken appears reasonable and we have no specific comments to offer.

Waste Management

Local Plan Policy

The Minerals and Waste LP of the Lincolnshire County Council and the related national regulations are relevant to how the waste arising from the construction of the solar park will be organised, recycled and disposed of.

Commentary

The submitted Outline Site Waste Management Plan identifies the project obligations with regard to waste legislation. It is understood that the detailed management plan will be submitted for Local Authority approval prior to the commencement of construction.

Adequacy of the application

It is acknowledged that LCC as Waste Disposal Authority are the expert body for this issue and the adequacy of the evidence as submitted. The detailed SWMP should be sent to the Local Authorities for review and comment with regard to Local Policy at the relevant time.

Water Quality and Resources

Local Plan Policy

Strategic Policy 10 (SP10) - Design. Clause 9 requires that: "Development around water sources will only be supported if it contains adequate protection preventing pollution from entering into the water source." Strategic Policy 17 (SP17) - Coastal East Lindsey. This policy sets out which settlements and areas the coastal policy applies to, which includes those areas of the development shown to be in the combined Flood Hazard Map of East Lindsey on The Coastal Zone map at the start of Chapter 10 in the ELLP. For those areas of the development which fall outside the Coastal Zone Strategic Policy 16 (SP16) - Inland Flood Risk will be relevant which also refers to surface and foul water. SP17 and SP16 both require developments to provide adequate flood mitigation measures.

The SELLP Policy 30: Pollution (See Appendix 6) considers water quality. It is cross-referenced in the justification for Policy 2: Development Management

Commentary

We have not previously made comments on this part of the assessment and the impacts of the proposal on any water quality issues so would revert to Lincolnshire County Council Highways who also act as Lead Local Flood Authority.

Adequacy of the application

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly on the proposed development. Having reviewed the information put forward, the approach taken appears reasonable and we have no specific comments to offer.

4. Conclusion

It is considered that subject to the requirements in the draft Development Consent Order, that in isolation, or taken cumulatively, the local impacts of this development would be acceptable, and that broadly the scheme would accord with local and national policies.