

Outer Dowsing Offshore Wind

The Applicant's Comments on Oral Submissions made and Written Summary of Oral Case at the OFH held on 10 October 2024

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Executive Summary

The first Open Floor Hearing (OFH) in relation to the application for development consent for the Outer Dowsing Offshore Wind project took place on 10 October 2024. This document summarises the oral submissions made at the OFH and provides the Applicant's response in writing.

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
BMV	Best and Most Versatile
DCO	Development Consent Order
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
ES	Environmental Statement
HND	Holistic Design Network
IAQM	Institute of Air Quality Management
NESO	National Energy Systems Operator
NGSS	National Grid Substation
oCoCP	Code of Construction Practice
OFH	Open Floor Hearing
OnSS	Onshore Substation
OTNR	Offshore Transmission Network Review
SMP	Soil Management Plan

Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), Total Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation, TotalEnergies and GULF.
Cumulative impact	Impacts that result from changes caused by other past, present or reasonably foreseeable actions together with the Project.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the sensitivity of the receptor, in accordance with defined significance criteria.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.

Term	Definition
Export cables	High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Landfall	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Link boxes	Underground metal chamber placed within a plastic and/or concrete pit where the metal sheaths between adjacent export cable sections are connected and earthed.
Mitigation	Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
National Grid Onshore Substation (NGSS)	The National Grid substation and associated enabling works to be developed by the National Grid Electricity Transmission (NGET) into which the Project's 400kV Cables would connect.
Onshore Export Cable Corridor (ECC)	The Onshore Export Cable Corridor (Onshore ECC) is the area within which, the export cables running from the landfall to the onshore substation will be situated.
Onshore substation (OnSS)	The Project's onshore HVAC substation, containing electrical equipment, control buildings, lightning protection masts, communications masts, access, fencing and other associated equipment, structures or buildings; to enable connection to the National Grid
Outer Dowsing Offshore Wind (ODOW)	The Project.
Order Limits	The area subject to the application for development consent, The limits shown on the works plans within which the Project may be carried out.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Pre-construction and post-construction	The phases of the Project before and after construction takes place.

Term	Definition
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Project design envelope	A description of the range of possible elements that make up the Project’s design options under consideration, as set out in detail in the project description. This envelope is used to define the Project for Environmental Impact Assessment (EIA) purposes when the exact engineering parameters are not yet known. This is also often referred to as the “Rochdale Envelope” approach.

1 Introduction and Document Purpose

1. The Rule 8 letter published 17 October 2024, requests the submission of The Applicant's Comments on oral submissions made and written summaries of oral case put at the first Open Floor Hearing (OFH) held on 10 October 2024.
2. Section 2 includes a summary of each speaker's oral case given at the OFH. The Applicant's response to the points raised has been provided in writing alongside the speaker's case, as appropriate.
3. Section 3 includes a summary of the Applicant's Oral Case presented at the Open Floor Hearing.

2 Summary of Oral case given by speakers, and the Applicant’s Written Response

Table 2.11: The Applicant’s Response to Oral Submissions

Summary of Oral Case	Applicant’s Response
<p>Jenny Pennington</p> <p>Jenny Pennington highlighted that she is making representations on approximately seven projects in the area. Whilst Mrs Pennington acknowledged the need for renewable energy, concerns were raised about:</p> <ul style="list-style-type: none"> ▪ The loss of Grade 1 agricultural land and stated that the use of Grade 1 agricultural land for the proposed purposes is “sacrilege.” Mrs Pennington noted that the land used by their farm is double cropping. ▪ The proposed cabling through agricultural land. ▪ The impact the substation requiring 35 acres will have. ▪ Long-term impact on the use of the land with some being taken out of production altogether. <p>Jenny Pennington also listed the following topics of concern: access roads, the level of infrastructure required, soil disturbance, dust effects, screening.</p> <p>Jenny Pennington stated that there are other areas that can be utilised.</p>	<ul style="list-style-type: none"> ▪ Use of Grade One land <p>Chapter 4 Site Selection and Consideration of Alternatives (APP-059) states that the selection of the grid connection location was predominantly driven by the Offshore Transmission Network Review (OTNR) which was launched by UK Government in July 2020. The OTNR evaluated grid connection options for all Round 4 projects, leading to a Holistic Network Design (HND) and identification of specific grid connection options for the Applicant. Following the HND in August 2023, the Applicant received confirmation from National Energy Systems Operator (NESO) that the confirmed grid connection for the Applicant would be Weston Marsh (also referred to by members of the local community as Spalding Marsh).</p> <p>As detailed in Section 8.4 and Section 9.4.1.2 of the Site Selection and Consideration of Alternative Environmental Statement (ES) Chapter (APP-059) the Applicant had due consideration of the relevant policies in respect of Best and Most Versatile (BMV) land during their site selection work. As discussed in Section 8.4 of APP-059, it was not possible to locate the Onshore Substation (OnSS) outside of Grade 1 Land, however the Applicant made a significant alteration to the onshore Export Cable Corridor (ECC) in response to feedback (as set out in Section 9.4 of APP-059) which significantly lowered the amount of</p>

Summary of Oral Case

Applicant's Response

BMV Grade 1 land that would be temporarily impacted by the construction of the onshore ECC.

- Extent of land take required for the OnSS

As described above, the Project was not able to locate the OnSS outside of BMV land. However, as assessed in the Land Use chapter of the Environmental Statement (AS1-050) the permanent infrastructure associated with the Project comprises approximately 0.007% of the total available BMV land in Lincolnshire (paragraph 359) and 0.03% of Grade 1 land within Lincolnshire (paragraph 360). Furthermore, the standalone and cumulative impact of the Project's infrastructure on the UK's vegetable market, as presented in Chapter 29 Socio-Economics (APP-084) concluded that the magnitude of change would be negligible, and the effects resulting from the Project alone or cumulatively would not be significant (in Environmental Impact Assessment (EIA) terms).

- Dust effects

Requirement 18 of the draft DCO (PD1-024) requires all construction works to be undertaken in accordance with an approved code of construction practice. The code of construction practice is required to be submitted to and approved by the relevant planning authority prior to the commencement of the onshore construction works and must contain an air quality management plan, which accords with the Outline Air Quality Management Plan (APP-270). Table 2.1 of the Outline Air Quality Management Plan (APP-270) describes the mitigation measures associated with the Project, required to prevent, avoid, or reduce and mitigate impacts associated with construction dust. These measures derive from the IAQM guidance but are adapted and refined according

Summary of Oral Case	Applicant's Response
	<p>to the proposed construction activities, logistics, and feasibility, to make them site-specific. In accordance with the IAQM guidance and assuming the effective application of measures, residual effects associated with construction dust are considered to be not significant.</p> <ul style="list-style-type: none"> ▪ Other identified topics of concern <p>In relation to the other topics identified, the Applicant refers to the detail of the following documents where these matters are considered:</p> <ul style="list-style-type: none"> ○ Chapter 4 Site Selection and Consideration of Alternatives (APP-059) ○ Chapter 19 Onshore Air Quality (AS1-046) ○ Chapter 23 Geology and Ground Conditions (APP-078) ○ Chapter 27 Traffic and Transport (AS1-053) ○ Chapter 28 Landscape and Visual Impact Assessment (APP-083). <p>The Applicant would welcome further clarification as to Jenny Pennington's specific concerns around; the effects of cabling running through the land, access roads and infrastructure which may be needed, the long-term disturbance of the land, and the screening.</p>
<p>Neil Wilson</p> <p>Mr Wilson explained that Woodlands Farm consists of 3000 acres of land and raised the following points:</p> <ul style="list-style-type: none"> ▪ Woodlands Farm organically produces multiple vegetables (including beetroot, potatoes and brassicas) on Grade 1 silt, which is unique to South Lincolnshire and is probably the most productive silt in the country. 	<ul style="list-style-type: none"> ▪ Quality and organic nature of produce <p>The Applicant is cognisant of the organic and premium nature of the produce grown by Woodlands Farm, the farming practices used and the importance of natural fertility in organic farms. The Applicant has responded to points raised concerning organic farming as part of The Applicant's response to Relevant Representations (PD1-071). The response to representations made on behalf of Woodlands Farm can be found under section 1.75 RR-075 and in particular at RR-075.006.</p>

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<ul style="list-style-type: none"> ▪ Produce from the farm are all premium quality for premium supermarkets. The land needed to produce this must be the highest quality to ensure natural fertility. ▪ Concerns raised about the cables which may impact the structure and the fertility of the land. ▪ Concerns raised about the effects of heat transfer from the cables. The effects are unknown but assumed to be negative. ▪ Concerns about cables affecting the drainage, as the farm is at sea level. ▪ Wishes to ensure that the soil will not be harmed so strict protocols should be in place to ensure contamination will not occur. It was stated that six Environmental Assessments were conducted and that strict protocols were set out for these. Mr Wilson stated that only one of these assessments was followed correctly. Four were not completed due to them being “kicked off” as protocol was not being followed and one assessment was completed without their knowledge. Mr Wilson expressed a lack of confidence that the contractors carrying out the proposed works will follow any protocol correctly. ▪ Mr Wilson proposed that the cables be diverted to the Grade 2 and Grade 3 soil in the area. He does not feel the compensation Woodlands Farm would receive would mitigate the loss resulting from the impacts and that any compensation deemed satisfactory to the farm would be too high for the Applicant to agree to. 	<ul style="list-style-type: none"> ▪ Effect of cables on structure and fertility of the land To minimise potential damage to soil structure, biology, and fertility, the applicant in consultation with the landowner and the applicant’s agricultural consultant (who has specialist knowledge and working experience of organic farming practices) will implement several key practices through the Soil Management Plan (SMP). These practices will be submitted post-consent for approval (and which must accord with the outline SMP (Document 8.1.3, version 2) (PD1-040) under requirement 19 (Code of construction practice) of the draft DCO (document 3.1)). The Applicant is also developing an Organic Land Protocol in consultation with the landowner and which will be appended to the oCoCP, aimed at protecting the integrity built up over 24 years of organic farming. The Applicant has responded to these points raised by Woodlands Farm as part of The Applicant’s response to Relevant Representations (PD1-071). Further detail can be found under section 1.75 RR-075 and in particular at RR-075.006. ▪ Heat transfer from cables The Applicant has been made aware of concerns over a local large infrastructure project and localised issues with crop growth. It should be noted that there has been no substantiated claim that the localised issues are caused by cable heating. The Applicant notes that there are thousands of kilometres of high voltage underground cables around the country, the Applicant is not aware of any evidence that heating from cables have affected crop growth. ▪ Drainage

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The Applicant is cognisant of the importance of drainage in the locality. The Applicant has procured the services of a local land drainage expert to collate land drainage plans and design pre and post construction drainage schemes which will allow drainage to be maintained during construction. The pre and post construction drainage schemes will also address the diversion or interruption of any water supplies and the management of irrigation systems. This is set out within the oCoCP, (APP-268, paragraph 104). Prior to commencement of construction of any stage of the onshore works, a code of construction practice (which must accord with the oCOCP) must be submitted to the relevant planning authority for approval under requirement 18 (Code of construction practice) of the draft DCO (document 3.1). Once post construction drainage plans are drafted they will be shared with the landowners and their comment sought. The Applicant will have regard to the comments provided and, where necessary, revise plans. The Applicant is aware that there may be instances where existing drainage schemes cannot be reinstated post construction, and it may be necessary for part or whole fields to be re-drained.

- Organic security protocols

The Applicant is only aware of one survey where on site notification was not provided, but the protocol was otherwise followed, (outlined in PD1-071, section 1.75 RR-075, point RR-075.016.). During a meeting on the 2nd October 2024, it was claimed by Mr Wilson that the incident referred to where surveys were undertaken without knowledge or permission and personnel were removed from the site 3-4 times related to a third party project. The Applicant has, post preliminary meeting,

Summary of Oral Case**Applicant's Response**

requested clarity regarding these events as the Applicant believes that there has been a case of mistaken identity. The Applicant is committed to following the protocols put in place and agreed between parties when accessing any land.

- **Route selection**

As detailed in Section 8.4 and Section 9.4.1.2 of the Site Selection and Consideration of Alternative ES Chapter (APP-059), the Applicant had due consideration of the relevant policies in respect of BMV. The Applicant's Responses to Relevant Representations submitted at the Procedural Deadline 19 September Page 455 of 481 (PD1-171) responded to Neil Wilson's specific points. As discussed in Section 8.4 of APP-059, it was not possible to locate the onshore substation (OnSS) outside of Grade 1 Land. However, the Applicant made a significant alteration to the onshore ECC in response to feedback (as set out in Section 9.4 of APP-059), which significantly lowered the amount of BMV Grade 1 land that would be temporarily impacted by the construction of the onshore ECC. The Applicant has also assessed the impact and cumulative impact of the Project's infrastructure on the UK's vegetable market in Chapter 29 Socio-Economics (APP-084) which concluded that there will be no significant effects (in EIA terms) resulting from the Project alone or cumulatively.

- **Compensation**

The Applicant is cognisant of the value of produce grown at Woodlands Farm. The Applicant continues to communicate with Woodlands Farm including commercial discussions regarding crop compensation.

3 Summary of The Applicant's Oral Submission at the Open Floor Hearing

4. Scott McCallum, of Shepherd and Wedderburn, on behalf of the Applicant, confirmed the Applicant:
 - would take the opportunity to respond to all the points in writing, as provided in this document;
 - thanked the speakers for their clear representations made during the hearing; and
 - reiterated the offer to continue discussions outside of the examination and endeavour to narrow issues.