

# Outer Dowsing Offshore Wind

## 18.2 The Applicant's Responses to Additional Submissions and Relevant Representations

Deadline 1

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## Acronyms & Definitions

### Abbreviations / Acronyms

Abbreviation / Acronym	Description
<b>DCO</b>	Development Consent Order
<b>EIA</b>	Environmental Impact Assessment
<b>OLEMS</b>	Outline Landscape and Ecological Management Strategy
<b>RIAA</b>	Report to Inform Appropriate Assessment
<b>RR</b>	Relevant Representation
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>SPA</b>	Special Protection Area

### 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.
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 Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Trenchless technique	Trenchless technology is an underground construction method of installing, repairing and renewing underground pipes, ducts and cables using techniques which minimize or eliminate the need for excavation. Trenchless technologies involve methods of new pipe installation with minimum surface and environmental disruptions. These techniques may include Horizontal Directional Drilling (HDD), thrust boring, auger boring, and pipe ramming, which allow ducts to be installed under an obstruction without breaking open the ground and digging a trench.

## Reference Documentation

APP-077	6.1.22 Chapter 22 Onshore Ornithology
APP-143	6.3.3.2 Chapter 3 Appendix 2 Onshore Crossing Schedule
APP-208	6.3.22.7 Chapter 22 Appendix 7 Winter Bird Survey 2023-24 Preliminary Summary
AS1-108	13.2 Addendum Winter Bird Survey 2023=2024
PD1-071	15.3 The Applicant's Responses to Relevant Representations

## 1 Introduction and Document Purpose

1. In line with the Rule 8 Letter and Examination Timetable outlined in Annex A of PD-011, the Applicant has been invited to respond to Relevant Representations (RRs) at Deadline 1, if not previously provided at the Pre-Examination Procedural Deadline. Furthermore, stakeholders are invited to submit comments in relation to the submitted application documents and proposed project, and the Applicant has provided in this document responses to those comments.
2. This document presents the Applicant's responses to
  - The RSPB's Relevant Representations on Onshore Ornithology not included in the Applicant's original relevant Representation Responses (PD1-071), and
  - Additional Submissions received from Interested Parties (IP), accepted by the Examining Authority, published on 14 October 2024.
3. The Applicant previously reviewed each of the Relevant Representations received, and provided detailed responses to each of those representations within 15.3 The Applicant's Responses to Relevant Representations (PD1-071) submitted at Procedural deadline 1 on the 19th of September 2024.

## 2 Response to the RSPB's Onshore Ornithology Relevant

### Representations

4. Relevant representation was made by the RSPB, submitted to the Planning Inspectorates on 13 of June 2024 (RR-056).
5. The Applicant subsequently responded to these representations as part of their Responses to Relevant Representations (PD1-071), however it was noted by the Applicant that a small number of the representations made by the RSPB were omitted from the document (PD1-071) in error. These representations are in relation to onshore ornithology and have now been responded to in Table 2.1.

Table 2.1 RR-056 Royal Society for the Protection of Birds

ID <sup>1</sup>	Relevant Representations	Applicant Response
Onshore Ornithology		
RR-056.19	<p>The RSPB has been in discussion with the Applicant with respect to the potential impacts of the construction and operation of the export cable route on wildlife. This is because it passes close to a number of national and international protected areas, as well as the RSPB's Frampton Marsh and Freiston Shore reserves and land within the Defra-funded Lincolnshire Wash Landscape Recovery Project (formerly known as the Greater Frampton Vision Landscape Recovery Project). The RSPB raised its concerns in its responses to two consultations carried out by the Applicant in 2023: in summer 2023 on its Preliminary Environmental Information Report (PEIR) and in autumn 2023 on subsequent changes and refinements to the project. Below we set out our current position on the concerns set out in those responses.</p>	Noted.
RR-056.20	<p>Impacts on The Wash Special Protection Area/Ramsar site and the Greater Wash SPA, including functionally-linked land.</p> <p>In our response to the Autumn 2023 consultation, the RSPB noted that, once two years of survey data were made available, it would review the potential implications of disturbance on the breeding, wintering and passage birds of these protected areas. This would consider areas of potential sensitivity and any mitigation that may be necessary. We have now reviewed the information provided with the application. This includes details of the second year of survey results, with the exception of March and April 2024 (see section 22.1 in APP-208). Based on our evaluation of this nearly complete data, we have concluded that any disturbance to wintering and passage birds on the cable route will be localised and short-term in nature. Subject to our comment below, we have no further concerns in relation to this aspect of the project. We request the Applicant provides the additional data for March and April 2024 so that we can review this conclusion in the light of two years' complete data.</p>	<p>The Applicant welcomes the RSPB's engagement with the information provided with the application in relation to onshore ornithology and their statement that they have no further concerns in relation to this aspect of the project, subject to review of the additional data from March and April 2024. These data have since been submitted, as part of the response to Section 51 advice, and are presented in document reference AS1-108. That document concludes that, following review of the data from the season two surveys, the assessment of significant effects in the EIA and the conclusion on adverse effects on site integrity in the RIAA, in relation to onshore ornithology, have not changed.</p>
RR-056.21	<p>Impacts on the RSPB's Frampton Marsh and Freiston Shore reserves.</p> <p>The RSPB's Frampton Marsh and Freiston Shore reserves are important freshwater and intertidal reserves, supporting many of the wetland birds protected by The Wash SPA/Ramsar site. Following submission of the RSPB's submissions to the PEIR and Autumn 2023 consultations, the RSPB had further discussions with the Applicant. During these, we raised a concern in relation to the potential for the construction of the cable route to affect the mains water supply to the RSPB Frampton Marsh reserve, as the route of the cable, and the works access route, crosses the pipe carrying the water supply. Among other things, this provides water critical to the wetland management carried out on the reserve. The RSPB has shared information on the location of the pipe with the Applicant and will continue discussions with them in order to ensure that, should the DCO receive consent, the construction of the cable corridor has no impact on the operation of the mains water supply to the reserve.</p>	<p>The Applicant welcomes the engagement to date and continued engagement with the RSPB on this matter. The Applicant understands that the water supply pipe for RSPB Frampton Marsh Reserve is located along the north side of Wyberton Roads. As can be seen on the Crossing Schedule (APP-143), all assets in this part of the Order Limits will be crossed using trenchless techniques. It is likely that the pipeline will be crossed by the Project's access track at AC-40, where the access enters the field to the north of Wyberton Road (APP-089, Figure 3.4.41). If the RSPB can provide the Applicant with an as-built plan of the pipeline, it will be added to the crossing plan and schedule.</p>
RR-056.22	<p>Impact on the Lincolnshire Wash Landscape Recovery Project.</p> <p>The Lincolnshire Wash Landscape Recovery Project is part of the pilot of Defra's England-wide Landscape Recovery Programme. The aim of the programme is to offer farmers and land managers the opportunity to co-design a bespoke agreement to produce environmental and climate goods across landscape scale projects, in order to deliver a range of outcomes, with a focus on net zero, biodiversity and water quality. Defra provides initial funding for a 2-year Development phase intended to culminate in negotiation of an agreement involving public funding for 20+ year implementation. The aim of the Lincolnshire Wash project is to use land to the south-east of Boston to expand the habitats that have developed so successfully at the RSPB's Frampton Marsh and Freiston Shore reserves to create a mosaic of wetland habitats over 3000 hectares. The project is part way through its 2-year Development phase and is due to conclude at the end of 2024, with the aim of securing the long-term funding described above. The RSPB has informed the Applicant that the cable route would pass through the project area, on land owned by project partners.</p>	<p>The Applicant commits to engaging with the RSPB regarding reinstatement of habitats within the Greater Frampton Vision area in the event that the DCO is granted and the Landscape Recovery Project secures long term funding, as outlined in Section 3.8.3 of the OLEMS (AS1-103), i.e. <i>"Where habitats are lost to site clearance, a basic program of like-for-like reinstatement would be applied. However, this would be on the understanding that mitigation may be realigned to accommodate RSPB's plans for the area or where those habitats have functionality for protected species, the habitat would be reinstated and improved. An example of this is the reinstatement of hedgerow habitats in this area, where RSPB's conservation strategy is to remove hedgerows in their vision area"</i>.</p>

<sup>1</sup> ID's have been continued from Section 1.56 of the Applicant's Responses to Relevant Representations ([PD1-071](#)).



ID <sup>1</sup>	Relevant Representations	Applicant Response
	<p>Therefore, should the DCO receive consent and Defra provide long-term funding for the Lincolnshire Wash Landscape Recovery project, we suggest it would be necessary to consider any potential affects of cable route construction on the recovery project at that time. In accordance with verbal assurances, we recommend and would welcome a commitment from the Applicant that this be dealt with as part of the development of any detailed construction and implementation plan for the cable route.</p>	<p>The Project remains committed to replacing all habitats post-project, but the location of some of these may be altered based on continued stakeholder engagement in relation to the Greater Frampton Vision.</p>

### **3 Response to Additional Submissions published to the Planning Inspectorate Website 14 October 2024**

6. Additional submissions accepted at the discretion of the Examining Authority were published to the Planning Inspectorate's website on 14 October 2024. The Applicant has responded to this representation's in Table 3.1, Table 3.2 and Table 3.3.

Table 3.1 North East Lincolnshire Council (Lauren Birkwood, Equans)

ID	Submission	Applicant's Response
3.1.1	On behalf of North East Lincolnshire Council, I can confirm that there are no detailed comments on the project at this stage as the proposal would not appear to affect our area in any physical manner. If necessary, further comments can be made during the examination period.	The Applicant welcomes the written submission from North East Lincolnshire Council.
3.1.2	However, we do acknowledge that it will support the renewable industry, and it is considered that the socio-economic impact and benefits should be explored and detailed in full. For example, it would be beneficial if it could be detailed where the wind farm would be serviced from and in particular if this would be from the Port of Grimsby.	The Applicant has considered the potential impacts of the Project on socio-economics, tourism and recreation within Chapter 29 of the ES (APP-084). The Applicant has not designated a specific construction or operations port at this stage and would not award the relevant contract prior to any consent being granted.

Table 3.2 Jon Harman

ID	Submission	Applicant's Response
3.2.1	We are the owners of [REDACTED] a property directly affected by the Outer Dowsing windfarm project. We are on the proposed cable route which if constructed as proposed will cut directly through our land. We also fall into the group of landowners who were not notified of the accepted application as per the notes on your website.	The Applicant has confirmed this party was sent proper notification (Notice of Acceptance of an Application for Development Consent under Section 56 of the Planning Act 2008) to the Planning Inspectorate case manager on the 1st July 2024.
3.2.2	[REDACTED] is a [REDACTED] private residence with approved planning consent to be used for equestrian purposes. It is not a farm and the land is not now of an agricultural classification. We are having significant issues over the last year getting the land agent, Dalcour Maclaren to engage with either ourselves or our agent to discuss and negotiate the terms the easement they want to put in place. We have provided a significant amount of comparable property data to support our valuation along with information on other areas of their heads of terms but they ignore it and are simply unwilling to engage with us on any of it.	The Applicant confirms that Heads of Terms have been agreed on 11 <sup>th</sup> October between the parties and this matter is resolved.
3.2.3	In your assesment of their application please can you require them to engage with the affected landowners and require them to reach a settlement that is agreeable to all the landowners as this is simply not being done at the moment.	The Applicant confirms that Heads of Terms have been agreed on 11 <sup>th</sup> October between the parties and this matter is resolved.

Table 3.3 North Lincolnshire Council

ID	Submission	Applicant's Response
3.3.1	Thank you for your letter dated 01 May 2024 giving North Lincolnshire Council (NLC) the opportunity to comment on the Outer Dowsing Offshore Wind project. I can confirm after consulting with consultees within North Lincolnshire Council, that no objections have been raised in respect of this project with the proposed development not likely to result in any significant impact upon North Lincolnshire.	The Applicant welcomes the written submission from North Lincolnshire Council.