



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix H2 to the Natural England Deadline 1 Submission
Natural England's Clarifications and Advice Regarding Soils
[PD1-006, PD1-039, PD1-041, PD1-056, PD1-059, PD1-071, and AS-013]

For:

The construction and operation of Outer Dowsing Offshore Wind Farm located approximately 54 km from the Lincolnshire Coast in the Southern North Sea.

Planning Inspectorate Reference EN010130

24th October 2024

Natural England's Clarification and Advice on Soils.

In formulating these comments, the following documents have been considered:

- [PD1-006] 2.3 Onshore Location Plan
- [PD1-039] 8.1 Outline Code of Construction Practice V2 Tracked
- [PD1-041] 8.1.3 Outline Soil Management Plan V2 Tracked
- [PD1-056] 8.10 Outline Landscape and Ecological Management Strategy V3 Tracked
- [PD1 -059] 8.13 Schedule of Mitigation V2 Tracked
- [PD1-071] 15.3 The Applicant's Response to Representation Responses - Natural England
- [AS-013] 14.2 The Applicants response to the rule 17 letter dates 3 July 2024 ODO

1) Summary of Advice

Natural England's advice remains unchanged as per Appendix H to the Relevant and Written Representations of Natural England [RR-045], regarding pre-consent surveys for Agricultural Land Classification (ALC) Grade and the requirement for further assessment of Deep Peat presence.

In the absence of a detailed, site-specific soil and ALC survey and assuming that all mapped ALC Grade 3 land is BMV (i.e. Subgrade 3a), it is impossible to provide an accurate baseline and demonstrate the likely potential impacts. Without these surveys the Applicant cannot demonstrate how the project will avoid or minimise impacts on best and most versatile (BMV) agricultural land nor the design of potential mitigation to safeguard the soil resources. These surveys are required as part of the consent process for Outer Dowsing Offshore Windfarm.

Please see further detailed advice below regarding these issues and Natural England's concerns.

2) Detailed Advice

Development on Peat

1. England's peatlands are our largest terrestrial carbon store and are vital for capturing and storing carbon. They provide a range of other valuable benefits including biodiversity rich ecosystems, improved water quality and natural flood management, the protection of historic environment features and connect people with nature.
2. Following the publication of the England Peat Action Plan ([England Peat Action Plan, May 2021](#)) and the Greater Manchester (GM) Peat Pilot, Natural England has a better understanding of the impact of carbon loss from damaged and unmanaged peat as well as the opportunity costs of not restoring peat as functioning ecosystem. The England Peat Action Plan states *'We want our peatland to meet the needs of wildlife, people, and the planet. All uses of peatland should keep the peat wet and in the ground. We will work to ensure all our peatlands, not just deep or protected peat, are responsibly managed, or, in good hydrological condition or under restoration management.'*
3. Natural England therefore does not support the principle of development on any peat soils, and strongly advises maximising the extent of peat omitted from the development footprint and highly recommend retaining peat in situ. We advise that in the absence of detailed survey's it will not be possible to avoid impacts on deep peat.

Agricultural Land Classification

4. Due to the extent of the temporary disturbance from many developments and the drive to maintain and strengthen BMV protection as set out in the 25 Year Environment Plan, It is considered important for a detailed ALC field survey to be undertaken in line with the MAFF 1988 '[Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land](#)'. The potential impacts of temporary disturbance on soils and BMV land should be considered.
5. A detailed ALC and soil survey of the agricultural land should be undertaken across the full Study Area to inform the Environmental Impact Assessment (EIA) as a single field effort. Both surveys can be undertaken at the same time drawing on the same

information, avoid duplication of survey effort and be available to inform design, EIA and environmental management plans.

6. Detailed soil and ALC data is necessary to provide a baseline for the ALC grade as well as soil properties to inform soil handling. This is important for areas of permanent and temporary land take. The inappropriate management of the soil resource can result in a permanent degradation of the land, including a change in the ALC Grade, which can ultimately result in the permanent loss of BMV agricultural land. Appropriate mitigation to prevent the potential loss of BMV land (including the degradation of agricultural land through inappropriate soil handling) includes the restoration of disturbed land to the baseline ALC Grade. In the absence of a characterisation study informed by a detailed soil and ALC survey, the restoration cannot be assured.
7. In some circumstances, pre-construction, ALC surveys are required in the absence of pre-consent ALC surveys. This is usually due to the inability to access sections of a site pre-consent. However, this is usually a small area of site, with the remaining land subject to an ALC survey to inform the EIA.
8. In the pre-application phase, Natural England clearly set out advice to the Applicant on Assessing BMV agricultural land specifying that detailed surveys should be carried out and that a worst-case scenario was an unsuitable approach. Subsequent advice was presented in our Relevant Representation's in Appendix H [RR-045] stating the ES should present 'site specific', both detailed and semi detailed ALC surveys to inform the decision maker in their application of NPS EN-3. This remains our position.