

**From:** [Jonathan Wood](#)  
**To:** [Outer Dowsing Offshore Wind](#)  
**Subject:** The Planning Inspectorate Ref EN010130 - Outer Dowsing Offshore Wind: Message from Jonathan Wood (Registration ID 20048969)  
**Date:** 27 November 2024 13:04:28  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[PINS re EN010130 Comments - Response to RRs 271124.pdf](#)  
**Importance:** High

---

You don't often get email from [REDACTED]

Dear Sir or Madam,

We have been trying to make comments on this project via the Planning inspectorate website (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130/examination/enter-a-comment>). When we try to submit the comments, we are greeted with a message which reads:-

"The request is blocked.

20241127T124542Z-er1bd968f9c8trvthC1LON245n00000002z0000000004sb2"

We have tried to submit our comments on multiple occasions yesterday and today, but this problem has persisted.

We have spoken with the Planning Inspectorate via the telephone, and they could only suggest that we make contact with you via email.

Given that it is impossible to use your website to make a comment, despite this being the only medium that you see fit to accept, we are sending this email to you with our comments attached and set out below the text of this message, and we insist that you accept these as our comments, in lieu of a submission via your website, given that this is impossible and the deadline for the latest round of responses is today.

Our comments are made on behalf of WOODLANDS FARM (KIRTON) LIMITED and ANDREW PETER DENNIS, and are an update on our relevant representations dated 12<sup>th</sup> June 2024 and our response to the applicant's responses to our relevant representations.

Please can you acknowledge receipt and confirm that you will accept these comments as validly submitted.

Yours faithfully,

Jonathan Wood

**The Planning Inspectorate Ref EN010130 APPLICATION FOR A DEVELOPMENT CONSENT ORDER BY THE PLANNING INSPECTORATE (ON BEHALF OF THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO) UNDER SECTION 56 OF THE PLANNING ACT 2008 OUTER DOWSING OFFSHORE WIND FARM DEVELOPMENT CONSENT ORDER EXAMINATION BY THE PLANNING INSPECTORATE:**

**UPDATE ON RELEVANT REPRESENTATIONS AND RESPONSE TO THE APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS ON BEHALF OF :**

## **WOODLANDS FARM (KIRTON) LIMITED and ANDREW PETER DENNIS:**

We wish to provide an update to our relevant representations and the responses from the applicant which were contained in their "Outer Dowsing Offshore Wind The Applicant's Responses to Relevant Representations" Document Reference: 15.3 Rev: 1.0 Date: September 2024. Our representations are shown in that document at para 1.75 and referenced RR-075.

Discussions between our client and the applicant have continued. A meeting was held on 14th November 2024 to discuss our concerns, but the applicant has not yet followed up in writing, as we requested at that meeting.

In the meantime, our concerns remain unresolved, and our objections to the project stand, as submitted in our relevant representations.

The applicant has shared a draft Organic Land Protocol with us and our clients. We are willing to continue to discuss this with the applicant, but to date we have a number of outstanding concerns with the draft document, which are yet to be addressed in writing, as set out below:-

- Haul road use between organic land and conventional land, given the need to avoid cross contamination of organic land;
- The use of disinfectants - we have previously explained a preference from our client to use clean water, rather than any disinfectant;
- The adequacy of access protocols – we are yet to see these;
- The requirement for ensuring personnel, plant, machinery, equipment cleaning and comprehensive records, which are shared in a timely fashion with our clients – these will be required by our client for audit by their organic accreditation body;
- What the “location-specific construction method statements” will comprise;
- Soil storage to ensure that there is no contamination, no erosion, fertility is maintained, and soil can be returned in good heart.
- management of construction phase soil bunds, including weed control.
- The potential requirement to deal with a more complex soil structure than simple a top soil and subsoil layer;
- Weed burden – how will this be dealt with, given the inability to use herbicides;
- How will soil restoration be agreed?
- How soil restoration will be signed off?
  - o If these are done by a project employee how we expect there to be independence of thought, as there is transparently a conflict of interest?
- How will soil restoration be undertaken in practice?
- A requirement for a period of ongoing soil assessment as organic land returns to production.
- The potential “recovery” period for the land, before the normal cropping rotation can be resumed, particularly noting the specialist crops in the rotation, and the requirement to establish a cover crop;
- Soil assessment, including the extent of reliance on soil survey data/laboratory testing, where we would like to see a holistic approach including trial digs to check the soil at rooting depth;
- The roles and responsibilities of the ALO and SCoW (and their experience and qualifications), as we are concerned that these roles require expertise and experience in order to fulfil the obligations – we need reassurance that this will be the case. As reference above we also

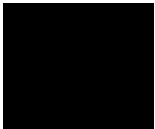
have concerns about the lack of independence of these roles, given the important responsibilities for signing off work;

We remain open to discussing these points with the applicant, but until such time as our concerns have been adequately addressed, our clients remain objectors to the project, and would wish to re-iterate their objections as submitted in their previous relevant representations dated 12th June 2024 as referenced above, as supplemented by the additional points set out above.

For the reasons set out above we wish to register our objections to the proposed Outer Dowsing Offshore Wind Farm Development Consent Order.

Jonathan Wood  
Savills (UK) Limited  
27<sup>th</sup> November 2024

**Jonathan Wood BSc (Hons) MRICS FAAV**  
**Director**  
**Rural**



Savills, Olympic House, Doddington Road, Lincoln, LN6 3SE

**Tel:** +44 [redacted]  
**Mobile:** +44 [redacted]  
**Email:** [redacted]  
**Website:** [redacted]



**NOTICE:** This email is intended for the named recipient only. It may contain privileged and confidential information. If you are not the intended recipient, notify the sender immediately and destroy this email. You must not copy, distribute or take action in reliance upon it. Whilst all efforts are made to safeguard emails, the Savills Group cannot guarantee that attachments are virus free or compatible with your systems and does not accept liability in respect of viruses or computer problems experienced. The Savills Group reserves the right to monitor all email communications through its internal and external networks.

For information on how Savills processes your personal data please see our [privacy policy](#)

Savills plc. Registered in England No 2122174. Registered office: 33 Margaret Street, London, W1G 0JD.

Savills plc is a holding company, subsidiaries of which are authorised and regulated by the Financial Conduct Authority (FCA)

Savills (UK) Limited. A subsidiary of Savills plc. Registered in England No 2605138.

Regulated by RICS. Registered office: 33 Margaret Street, London, W1G 0JD.

Savills Advisory Services Limited. A subsidiary of Savills plc. Registered in England No 06215875. Regulated by RICS. Registered office: 33 Margaret Street, London, W1G 0JD.

Savills Commercial Limited. A subsidiary of Savills plc. Registered in England No 2605125. Registered office: 33 Margaret Street, London, W1G 0JD.

Savills Channel Islands Limited. A subsidiary of Savills plc. Registered in Guernsey No. 29285. Registered office: Royal Terrace, Glatigny Esplanade, St Peter Port, Guernsey, GY1 2HN. Registered with the Guernsey Financial Services Commission. No. 86723.

Martel Maides Limited (trading as Savills). A subsidiary of Savills plc. Registered in Guernsey No. 18682. Registered office: Royal Terrace, Glatigny Esplanade, St Peter Port, Guernsey, GY1 2HN. Registered with the Guernsey Financial Services Commission. No. 57114.

We are registered with the Scottish Letting Agent Register, our registration number is LARN1902057.

Please note any advice contained or attached in this email is informal and given purely as guidance unless otherwise explicitly stated. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. No liability is given to any third party and the figures suggested are in accordance with Professional Standards PS1 and PS2 of the RICS Valuation –Global Standards (incorporating the IVSC International Valuation Standards) effective from 31 January 2022 together, the "Red Book". Any advice attached is not a formal ("Red Book") valuation, and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such. If formal advice is required this will be explicitly stated along with our understanding of limitations and purpose.

**BEWARE OF CYBER-CRIME:** Our banking details will not change during the course of a transaction. Should you receive a notification which advises a change in our bank account details, it may be fraudulent and you should notify Savills who will advise you accordingly.

The Planning Inspectorate Ref EN010130 APPLICATION FOR A DEVELOPMENT CONSENT ORDER BY THE PLANNING INSPECTORATE (ON BEHALF OF THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO) UNDER SECTION 56 OF THE PLANNING ACT 2008 OUTER DOWSING OFFSHORE WIND FARM DEVELOPMENT CONSENT ORDER EXAMINATION BY THE PLANNING INSPECTORATE:  
UPDATE ON RELEVANT REPRESENTATIONS AND RESPONSE TO THE APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS ON BEHALF OF :  
WOODLANDS FARM (KIRTON) LIMITED and ANDREW PETER DENNIS:

We wish to provide an update to our relevant representations and the responses from the applicant which were contained in their "Outer Dowsing Offshore Wind The Applicant's Responses to Relevant Representations" Document Reference: 15.3 Rev: 1.0 Date: September 2024. Our representations are shown in that document at para 1.75 and referenced RR-075.

Discussions between our client and the applicant have continued. A meeting was held on 14th November 2024 to discuss our concerns, but the applicant has not yet followed up in writing, as we requested at that meeting.

In the meantime, our concerns remain unresolved, and our objections to the project stand, as submitted in our relevant representations.

The applicant has shared a draft Organic Land Protocol with us and our clients. We are willing to continue to discuss this with the applicant, but to date we have a number of outstanding concerns with the draft document, which are yet to be addressed in writing, as set out below:-

- Haul road use between organic land and conventional land, given the need to avoid cross contamination of organic land;
- The use of disinfectants - we have previously explained a preference from our client to use clean water, rather than any disinfectant;
- The adequacy of access protocols – we are yet to see these;
- The requirement for ensuring personnel, plant, machinery, equipment cleaning and comprehensive records, which are shared in a timely fashion with our clients – these will be required by our client for audit by their organic accreditation body;
- What the “location-specific construction method statements” will comprise;

- Soil storage to ensure that there is no contamination, no erosion, fertility is maintained, and soil can be returned in good heart.
- management of construction phase soil bunds, including weed control.
- The potential requirement to deal with a more complex soil structure than simple a top soil and subsoil layer;
  - Weed burden – how will this be dealt with, given the inability to use herbicides;
  - How will soil restoration be agreed?
  - How soil restoration will be signed off?
    - o If these are done by a project employee how we expect there to be independence of thought, as there is transparently a conflict of interest?
  - How will soil restoration be undertaken in practice?
  - A requirement for a period of ongoing soil assessment as organic land returns to production.
  - The potential “recovery” period for the land, before the normal cropping rotation can be resumed, particularly noting the specialist crops in the rotation, and the requirement to establish a cover crop;
- Soil assessment, including the extent of reliance on soil survey data/laboratory testing, where we would like to see a holistic approach including trial digs to check the soil at rooting depth;
- The roles and responsibilities of the ALO and SCoW (and their experience and qualifications), as we are concerned that these role require expertise and experience in order to fulfil the obligations – we need reassurance that this will be the case. As reference above we also have concerns about the lack of independence of these roles, given the important responsibilities for signing off work;

We remain open to discussing these points with the applicant, but until such time as our concerns have been adequately addressed, our clients remain objectors to the project, and would wish to re-iterate their objections as submitted in their previous relevant representations dated 12th June 2024 as referenced above, as supplemented by the additional points set out above.

For the reasons set out above we wish to register our objections to the proposed Outer Dowsing Offshore Wind Farm Development Consent Order.

Jonathan Wood  
 Savills (UK) Limited  
 27<sup>th</sup> November 2024