



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix H5 to the Natural England Deadline 4 Submission
Natural England's comments on Soils

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

3rd February 2025

Appendix H5 - Natural England's Advice on Soils

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

- [REP3-021] 8.1 Outline Code of Construction Practice V4 (Tracked)
- [REP3-028] 8.10 Outline Landscape & Ecological Management Strategy V4_with Annex A7 (Tracked)
- [REP3-056] 20.09 Clarification Note Land Take, Soil Calculation and Storage Bunds
- [REP3-024] 8.1.3 Outline Organic Land Protocol

1. Summary

Natural England welcomes the provision of document 8.1.3 - Outline Organic Land Protocol [REP3-024], which considers soil health, along with the additional information provided on Agricultural Drainage and Irrigation in paragraph 110 of The Outline Code of Construction Practise [REP3-021]. However, Natural England advise that we still require clarification from the Applicant on the duration of soil after care that will be conducted during the post-decommissioning phase of the project.

The Clarification Note: Land Take, Soil calculation and Storage Bunds [REP3-056], is a welcomed submission which Natural England has reviewed. We have provided our detailed advice on this document in Table 2 below. We advise that more detailed information should be included and secured within the Outline Soil Management Plan.

Natural England's position regarding the requirement for pre-consent surveys for Agricultural Land Classification (ALC Grade) Grade and the requirement for further assessment on Deep Peat Presence, remains unchanged, as per Appendix H to our Relevant Representations [RR-045] and Appendix H2 of our Deadline 1 submission [REP-063]. In the absence of a detailed, site-specific soil and ALC surveys, it is not possible to provide an accurate baseline and robustly 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 in line with the mitigation hierarchy. Additionally, they cannot demonstrate, how the design of potential mitigation will safeguard the soil resources, should it not be possible to avoid impacts. We advise that these surveys are required as part of the consent process for Outer Dowsing Offshore Windfarm.

Please see Natural England's advice in Tables 1 and 2 below for further detailed comments on the submitted documents.

Table 1: Natural England's Detailed Advice on Clarification Note: Land Take, Soil calculation and Storage Bunds [REP3-056]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General Point	In relation to soil bunds, we highlight that materials should be stored like upon like, so that topsoil shall be stripped from beneath subsoil bunds and subsoil from beneath overburden bunds.	We advise that this should be clear across all documents relating to soils bunds and a commitment do as set out secured in the soil management plan to resolve this issue.
2	1.2 (para 5), 1.4	<p>Natural England advises that full detailed site-specific target soil profiles for the cable route corridor are not provided. We highlight that without the data from ALC surveys and soils testing, there is insufficient evidence to provide accurate depth figures and target soil profiles.</p> <p>The soil profile is as standard, typically considered to be approximately 1.2m deep (which is typically considered to be 25-30cm topsoil over 90-95cm subsoil). The Applicant has stated a typical topsoil depth of 45cm, which is deeper than the typical figure used.</p> <p>A typical upper subsoil depth of 7.5cm has been stated, but no typical figure that has been considered is provided for the lower subsoil depth.</p> <p>Natural England is concerned that the figures considered differ from the standard range, with no explanation provided as to why this is considered suitable. We are concerned that a potential for soil mixing exists which could lead to disruption of the soil's restoration profile post handling.</p>	<p>We advise that the Applicant final calculations to inform any consent, should be based on accurate data from ALC/soils surveys. Natural England have advised previously on the need for such surveys, in our relevant representations [RR-045] and response provided at Deadline 1 [REP1-063]. We advise that this information is key to allowing the soil type data to successfully inform the restoration profile.</p> <p>We advise that soil stripping depths should be clearly set out, reflecting the soil horizon depths, which would be identified from a detailed ALC soil survey</p> <p>Natural England advises that more detail on the Applicant's current calculations is provided, to understand how the estimated soil profile values that have been presented, have been calculated.</p> <p>A figure for the depth of lower subsoil to be excavated should be provided.</p> <p>The advice above is also applicable to document 8.1.3 Outline Soil Management Plan V3 (Tracked) [REP3-023]. All this information is expected to be contained and secured within a Soil Management Plan (SMP) / Soil Resource Plan (SRP).</p>

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
3	1.2 (para 8)	<p>Natural England notes that there is limited information on the duration of time top soils will be in storage.</p> <p>We highlight that soil erosion can cause a decrease in soil and nutrients, and deposition of other material that could reduce BMV land's capability for future agricultural production.</p> <p>The incidence of erosion is determined by interactions between weather, soil type/condition, topography and the amount and type of vegetative cover. It is also strongly influenced by agricultural management practices.</p> <p>There is specific guidance in the ALC Guidelines in relation to erosion and it is acknowledged that a number of the risk factors for erosion (i.e. soil depth or gradient) are taken into account by other parts of the ALC grading process.</p> <p>We advise that all storage bunds intended to remain in situ for more than 6 months or over the winter period should be seeded. Weed control and other necessary maintenance should be carried out in accordance with Defra Construction Code of Practice.</p> <p>We advise that for stockpiles that are to be grass seeded and maintained, a maximum side slope of 1 in 2 (25°) is appropriate.</p>	<p>Natural England advises that ALC surveys should be undertaken to form part of a comprehensive set of baseline soil and ALC information.</p> <p>We also advise that commitments/mitigation measures for storing soil are adopted by the Applicant and secured in the Soil Management Plan. .</p>

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		<p>As noted in Natural England's Relevant Representations response [RR-045]. An ALC survey has not been undertaken within the area proposed for the route of trench line for the underground cabling nor the proposed substation location. This is particularly important given that soil disturbance will take place in these areas. The data gathered from the soils surveys/ALC surveys will inform suitable soil handling and restoration criteria</p>	
4	1.4 (para 21)	<p>Natural England advises that this This should read as 'topsoil bund with a 37° angle of repose' as indicated by the plate and its reference.</p>	<p>We advise that this should be corrected.</p>