

APPLICATION BY GT R4 LIMITED, TRADING AS OUTER DOWSING OFFSHORE WIND

POST HEARING SUBMISSIONS

ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL

AT DL4a

Introduction

1. Lincolnshire County Council (“LCC”) attended Issue Specific Hearing 5 (“ISH5”) and ISH3 on 12th February 2025. A summary of LCC’s oral representations for both hearings appears below.

Agenda item 3.2

2. LCC spoke to confirm that it does not seek to comment on off shore or seascape matters.

Agenda item 3.3

3. LCC remains satisfied that the FRA has been appropriately prepared.

Agenda item 3.4

4. LCC continues to ask for additional measures to secure measurable net gain within the DCO itself. Without which, this should not form the basis of any positive weight in the overall balance.
5. It is noted that the Applicant’s current projections are for a net loss of habitat units [AS-014 at para 175]. Set against this, the Applicant has repeatedly stated that it is committed to “exploring opportunities for net gain” (see planning statement at paragraph 70). There is therefore no actual evidence before the ExA that a net gain is achievable, much less that one is secured within the terms of the DCO. LCC has concerns that there is a tension here between what is projected to be achieved, i.e. a loss, and the Applicant’s aspirations which are not reflective of its own evidence.
6. It would appear that to achieve a net gain, the Applicant would need to purchase off-site units. If this is proposed, it could, and should, be secured within the DCO. It does not appear that the

Applicant has explored this opportunity in any great detail as the promises to “explore opportunities” appear to all relate to future intentions rather than any evidence that such opportunities have already been explored and either discounted or secured.

7. This contrasts strongly with other DCOs in Lincolnshire where a large percentage increase in biodiversity has been secured in the DCO including :
 - a. 76.8% gain in habitat units as part of requirement 9 of the Cottam Solar DCO,
 - b. requirement 8 of the Heckington Fen DCO requires a 65% gain in habitat units, and
 - c. requirement 9 of the West Burton DCO requires 69.4%.
8. LCC understands that on site gain may be more difficult to achieve with a primarily linear project, however, the application currently lacks both positive aspiration and specificity leading to, in LCC’s view, tension with EN-1 in this regard.

Agenda item 3.5

9. LCC continues to raise concerns in relation to the cumulative loss of BMV soils within the area, as set out in its LIR and other written representations.

Agenda item 3.6

10. LCC would wish to see a mechanism within the DCO for findings of the design review panel to be addressed and/or fed back into the design. It is understood that not all findings of the DRP will be possible or desirable to achieve, nevertheless, it is entirely possible to require the Applicant to explain how the feedback from the DRP has been taken into account in the final design and if any suggestions are not taken up, why this is the case.

Agenda item 3.7

11. The West Burton Solar DCO defines “relevant planning authority” in Article 2 as: “*“relevant planning authority” means the local planning authority for the area in which the land to which the provisions of this Order apply is situated and as more particularly described for the purposes of the requirements in Schedule 2 (requirements).*” Schedule 2 paragraph 1 then provides as follows:

“1. In this Schedule—

“relevant planning authority” means—

(a) Lincolnshire County Council for the purposes of—

- (i) Requirement 6 (battery safety management);
- (ii) Requirement 11 (surface and foul water drainage);
- (iii) Requirement 15 (construction traffic management plan);
- (iv) Requirement 18 (public rights of way);
- (v) Requirement 19 (soils management); and
- (vi) Requirement 22 (long term flood risk mitigation); and

(b) West Lindsey District Council and Bassetlaw District Council for the purposes of—

- (i) Requirement 4 (community liaison group);
 - (ii) Requirement 5 (detailed design approval);
 - (iii) Requirement 7 (landscape and ecological management plan);
 - (iv) Requirement 8 (ecological protection and mitigation strategy);
- ...

12. The Cottam Solar Project includes almost identical drafting.

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