

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

POST HEARING SUBMISSIONS

ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL

AT DL6

Introduction

1. Lincolnshire County Council (“LCC”) attended Issue Specific Hearing 8 (“ISH8”) on 19th March 2025. A summary of LCC’s oral representations for this hearing is set out below.

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2. LCC spoke to confirm its ongoing objection to the loss of BMV soils within Lincolnshire both as a result of this project and in combination with other energy schemes across the County. The loss is significant and material.
3. The OnSS is located on Grade 1 land which LCC has consistently objected to.
4. The Appellant’s assessment set out in Chapter 25 Land Use [REP4a-020] states that “*The permanent loss of agricultural land from Project alone resulted in a major (significant) effect (see section 25.7.2).*” (paragraph 379)
5. The effect of loss of BMV soils from the OnSS, the NGSS and the Naylor’s Farm development is considered to be high sensitivity as permanent loss of more than 20ha is a major adverse impact. Therefore, the cumulative permanent loss of 61.5871.4ha of BMV land would be considered a major (significant) effect in EIA terms, even without Naylor’s Farm, this is still assessed by the Applicant as a major (significant) effect (see paragraph 386).
6. Since the previous draft of Chapter 25, other projects have come forward in Lincolnshire to a stage where their impact on soils can and should be considered within the cumulative assessment for Outer Dowsing. This has resulted in an update to Chapter 25 [REP4a-020] which now states that the projected cumulative loss of BMV soils is 2053.83ha. This is a doubling from the previously projected effect of 1020.43ha.
7. Whilst the Applicant would no doubt state that they should not be “penalised” for soil and land use changes brought about by other projects, this is exactly what is required from a cumulative

assessment – to ensure that the negative effect as a whole does not occur even if each step along the way may be individually acceptable.

8. Plainly the loss of over 2000ha of BMV soils is not acceptable.

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9. LCC has reviewed the updated design documents and is satisfied that the Applicant has strengthened the mechanism for inputting the views of the design review panel into the eventual design, and including a requirement to explain the rationale behind any decision not to follow guidance given by the review panel.

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10. Requirement 11. In relation to maintenance of the proposed landscaping scheme around the OnSS, LCC understands that both the ExA and LCC wish to see there be a requirement to maintain (including replant failed trees) for the lifetime of the OnSS. LCC understands that the Applicant proposes to amend section 2.5.5 of the OLEMS to provide for replacement if “significant losses” occur.
11. The Council had concern about the introduction of a further layer of uncertainty as to the definition of “significant” in this context. However following discussion with the applicant the applicant has agreed to amend the wording and remove the word significant and replace this with wording that is more tangible “*such that the purpose of screening the OnSS is no longer achieved as a result of gaps in the planting.*” The Council welcomes this clarity and confirms that this provides an appropriate mechanism to ensure that an appropriate level of screening will exist for the duration of the OnSS.
12. The additional wording shown in paragraph 52 of the OLEMS should allow for re-planting required due to unexpected die back or plant loss outside the 5 year replacement window. To avoid ambiguity, the Council requested that this be more explicit and reference the actual Works number which is: *Work No. 23 – Landscaping works.*
13. The applicant has confirmed to add a reference to Works Number 23 into the additional text to be submitted at DL6. On that basis the Council confirms that this issue is now resolved.