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By Email only

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Dear Sir

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by GT R4 Ltd ("the Applicant") for an Order granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm ("the Proposed Development")

Further to your letter dated 12 August 2025 requesting further information from various parties in respect of the above application it is noted that Lincolnshire County Council have been invited to respond to paragraph 50 Onshore Traffic and Transport and our comments are as follows.

For Town and Country Planning applications in assessing traffic impacts of developments, the applicant will be asked to consider any other committed developments. This will ensure that the impact of the new development has been considered cumulatively with existing developments (or those with permission). Whilst Outer Dowsing has done this appropriately, it is only the second Development Consent Order (DCO) that has progressed beyond examination stage in this area. The only other project was granted DCO in 2023 (Boston Alternative Energy Facility) to date remains unimplemented.

For Town and Country Planning Act developments, assessing cumulative impacts usually relates to traffic associated with the operation of the development (not the construction) as the operational traffic is usually higher than the construction traffic. For example, an application for 1000 residential properties may generate 500 peak hourly trips in perpetuity, whereas the construction of 500 residential properties will have only generated maybe 50 HGV trips during the peak hours for a temporary construction period of upto four years.

The majority of the DCOs that are emerging in this area are still at pre-application stage (Pipelines, solar farms, cables, overhead lines etc) the operational traffic in perpetuity is relatively small. However, the construction traffic over a 2-3 year period will be (if granted) relatively high because these are large infrastructure projects. So, a large solar farm may have 1000 construction trips per day for the peak three months in a 24-month construction

period, and then when completed and operational its maintenance traffic may be less than 10 trips per day in perpetuity.

Using the standard planning approach of committed development will mean that the first or second DCO granted in an area will get consent on the basis of its construction traffic impact being acceptable with necessary mitigation. The next DCO application will have to then take account of the already consented construction traffic and if the cumulative of the impacts is unacceptable, it will have to be subject to mitigation measures so that peak construction does not occur at the same time as the existing consented ones (which is outside the applicant's control). Subsequent DCO applications submitted will similarly need to have further mitigation measures, as further applications are submitted at some stage at tipping point will be reached where the necessary mitigation measures will need to be so onerous that it will compromise the viability of the development and a judgement will need to be made by the decision maker, in the planning balance, if it is acceptable that the harm caused to highway capacity /safety from the development is outweighed because of the need for the development. The majority of the emerging DCO projects in this area have construction impacts for temporary periods (2-3 years) and have peak periods within them. Such an approach will cause developers issues with cost and deliverability as construction programmes cannot reasonably be adjusted for delays or changes to construction timetables.

Therefore, in this locality a point will be reached when the granting of a the next DCO will result in the existing highway capacity being exceeded and a position could be reached where no further DCOs are able to commence development until the existing ones have been constructed or their consent lapses. This would question the tests of both enforceability and reasonableness to put such restrictions in place. For instance if a developer with an extant DCO does not to commence development until close to the end of the expiration period of the consent and has a three year construction programme this could result in delays of up to eight years for subsequent projects which would not be reasonable for any development especially those defined as critical national infrastructure.

Consequently, what is needed is a more reasonable and flexible approach which allows for inevitable changes in procuring and delivering large infrastructure projects in a local vicinity. Ideally, each consented DCO should have statutory requirement to be involved in a Joint Construction Traffic group which would mean that as changes occur to construction programmes, it can be agreed and managed so that the cumulative traffic impacts do not become unacceptable. But the actions from this group would need to be binding and fairly agreed between all developers and the Highway Authority. Should such a group be effective and with binding agreements this could enable several DCOs to be approved in an area with the Highways Authority knowing that control and management of cumulative construction traffic can be kept to an acceptable level on the network. The other alternative is large scale improvements to the highway network to increase capacity but this is unlikely to be viable in respect of cost and timescales required for such improvements to be delivered.

Whilst the Council has continued a dialogue with the applicant since the close of the examination there has been no further discussion on potential measures to address the concern about the cumulative impact on the highway network as further projects arise.

However, the Council is making all emerging NSIP developers in this area aware of its concern of the cumulative impact of construction traffic on the highway networks should all schemes receive consent and be implemented.

In respect of Paragraph 40 Onshore Ecology and Ornithology whilst the Council has not been invited to comment on this topic given the Council made a number of representations on this matter during the examination it is appropriate that the Council provides some feedback on this matter. As a starting point the Council has reviewed the question documents referenced but is slightly confused by the BNG query. The Council considers that the Applicant has used the latest version of the metric and does present the final percentages for each habitat type. AS-014 (Para 221) states that the project will deliver -0.80% for habitat Biodiversity Units, +14.40% for linear Biodiversity Units (which include hedgerow and lines of trees) and +0.08% for riparian Biodiversity Units. The report states that that Statutory Metric was used and from the included screenshots, this does appear to be the case.

The Council maintains its stated position that whilst BNG does not yet formally apply to NSIPs, best practice amongst most NSIP developers is to seek to deliver a minimum of 10% BNG in advance of the statutory requirement to do so. The Council would therefore expect the project to include measures to deliver a minimum of 10% BNG and that these measures should be secured in the DCO.

The Council considers the above response addresses the matters the Council was requested to comment on within the letter dated 12 August 2025. However, if you have any questions about this response please do not hesitate to contact me as set out above, I hope the Council's comments are helpful to the Secretary of State.

Yours faithfully

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Neil McBride
Head of Planning