

LOCAL IMPACT REPORT

**PLANNING ACT 2008 (AS AMENDED)
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010
(AS AMENDED)**

PLANNING INSPECTORATE REF:- EN020019

**SUBJECT: TRITON KNOLL ELECTRICAL SYSTEM
APPLICANT: TRITON KNOLL OFFSHORE WIND FARM LTD
LOCATION: ANDERBY CREEK TO BICKER FEN**

**INTERESTED PARTY: LINCOLNSHIRE COUNTY COUNCIL (LCC)
UNIT 7, WITHAM PARK HOUSE
WATERSIDE SOUTH
LINCOLN
LINCOLNSHIRE LN5 7JN**

OUR REF: TRITON KNOLL LCC LIR OCT 15

DATE: 05 OCTOBER 2015

1.0 INTRODUCTION

1.1 Following the preliminary meeting held in Skegness on 3rd September 2015, the Examining Authority wrote to Lincolnshire County Council (LCC) setting out the procedural decisions made in respect of the forthcoming Examination into the application.

1.2 This document is the Local Impact Report (LIR) for LCC. Where appropriate, cross reference is made to the Statement of Common Ground (SoCG) that is in the process of being agreed between the applicants and LCC.

1.3 The sole definition of an LIR is given in s 60(3) of the Planning Act as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'. The advice note pertaining to Local Impact Reports states that the *'content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition'*. The topics suggested that may be helpful are set out below. The report will not slavishly follow that list, but has used it as a helpful template.

- a) Site description and surroundings/location
- b) Details of the proposal
- c) Relevant planning history and any issues arising
- d) Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master-plans and an appraisal of their relationship and relevance to the proposals
- e) Relevant development proposals under consideration or granted permission but not commenced or completed
- f) Local area characteristics such as urban and landscape qualities and nature conservation sites

- g) Local transport patterns and issues
- h) Site and area constraints
- i) Designated sites
- j) Socio-economic and community matters
- k) Consideration of the impact of the proposed provisions and requirements within the draft Order (ie the scheme) in respect of all of the above

2.0 BACKGROUND – 2012 HEARING – OFF AND ON SHORE DEVELOPMENT

- 2.1 On 11th July 2013 the Secretary of State gave consent for the off shore array associated with the current application. At the hearing LCC expressed strong representations based on the lack of information regarding on-shore ramifications.
- 2.2 Effectively, at the time, both the SoCG and the written statement acknowledged that, in isolation, the off-shore elements of the proposal, based upon the evidence put before the Panel, was not considered to be harmful to the environment or population of Lincolnshire.
- 2.3 Despite that, however, LCC expressed concerns regarding the inevitable on-shore ramifications of the off-shore development. This Examination relates to the electrical system associated with the consented off shore array.

3.0 SITE DESCRIPTION

- 3.1 LCC's main concern is the impact of the proposal on the natural environment and local population in the coastal strip and immediate

environs, in particular the landfall site at Anderby Creek, and the Intermediate Electrical Compound (IEC) site at Marsh Lane, Orby.

Anderby Creek

- 3.2 Anderby Creek is an unspoilt tranquil location much sought after by those visitors and holiday makers attracted by a less commercial and simpler experience. It is located in the heart of the Lincolnshire Coastal Country Park (LCCP) which is a valued community, tourism and natural asset for the enjoyment of all. It provides a unique combination of seascape, landscape and skyscape. The promotion of "low impact" environmental tourism is a vital element in diversifying the tourism offer away from a more traditional "bucket and spade" holiday. The Lincolnshire Coastal Country Park has received funding from Lincolnshire County Council's Area Based Grant and the Rural Development Programme for England (Coastal Action Zone). The vision for the LCCP is highlighted in more detail below in para. 3.12. More information is provided at the following link:

<http://microsites.lincolnshire.gov.uk/coastalcountrypark/about/>

- 3.3 The LCC has promoted this area on that basis and has achieved notable success. It is now an acknowledged and well supported natural resource where further modern influences are to be avoided. Further south the coastline is subject to erosion, and beach nourishment is used to maintain the narrow sandy beaches found between Mablethorpe and Skegness. This tidal landscape is flat, open and vast with big skies and views that extend out to sea. These ever changing views are dependant upon the tides and the weather. Views inland are enclosed by sand dunes and man-made sea defences in the form of sea banks and concrete embankments alongside the coastal resorts. This is a simple, peaceful

and remote landscape, made up of natural coastal saltmarsh, mud flats and sand banks with long sandy beaches.

- 3.4 Sand dunes and sea embankments have been colonised largely by marram grasses, but in other parts by scrub vegetation including sea buckthorn. Herbaceous vegetation with a rich flora of wildflowers can also be found in the grasslands on the older sand dunes. This range of coastal habitats is particularly important for providing food for many resident and migrating wildfowl and wading birds. A submerged oak forest near Anderby Creek is visible during very low tides.
- 3.5 There are no official rights of way or roads, resulting in a largely desolate naturalistic landscape, but people have general access to nature reserves and along the shoreline. In some areas the beaches and shoreline are used by occasional fishermen, dog walkers, nature lovers and horse riders. The beaches between Mablethorpe and Skegness are much busier with tourists during the summer season. This is a distinctive naturalistic coastal landscape with a variety of views influenced by changing tides, light, and weather conditions.

Marsh Lane, Orby

- 3.6 The site for the intermediate compound lies on the south side of Marsh Lane. In the immediate area, there is limited woodland, and hedgerow cover is also sparse. There are also some wetland reed bed systems at the old 'borrow pits' around Anderby Creek which are Sites of Special Scientific Interest. The Roman Bank and water filled sea bank 'borrow pits' are also a lost reminder of past inundations from the sea where the clay dug from the pits was used to repair the sea banks. This is an intact rural landscape with a distinctive character, reflecting its largely natural, unspoiled and unchanged appearance. As such it is an area valued for its

lack of modern intrusion where people can visit to relax, unwind and enjoy a more natural environment.

Relevant planning history

- 3.7 Planning history relevant to the on-shore proposal is difficult to address, as the site is so large and extends through approximately half the district of East Lindsey and most of Boston Borough Council.
- 3.8 LCC has a particular concern regarding the potential for the industrialisation of what is essentially a rural landscape. Whilst one expects to see agricultural buildings of various types and sizes in the area, one does not expect to see more industrial type infrastructure such as the IEC and Substation at Bicker Fen which can be at odds with the prevailing character.

Policy Framework

- 3.9 The Development Plan comprises the following documents (below). The Government's National Planning Policy Framework is a material consideration alongside the suite of Planning Guidance. The following policies are considered relevant to the consideration of this application:

- a) Boston Adopted Local Plan 1999**
- b) Interim Plan (Non-Statutory Development Control Policy) February 2006**
- c) SE Lincolnshire Emerging Local Plan 2015**
- d) East Lindsey Local Plan Alteration 1999**
 - Policy A4 – Protection of General Amenities
 - Policy A5 - Quality and Design of Development
- e) East Lindsey Emerging Core Strategy**

- f) National Planning Policy Framework
- g) Planning Guidance
- h) National Policy Statement EN1 and
- i) National Policy Statement EN3

National

3.10 The overall thrust of the National Planning Policy Framework (NPPF) is the presumption in favour of sustainable development. In relation to renewable energy developments a number of paragraphs are relevant. I paraphrase the pertinent elements below:-

- para. 93 - Planning is important in supporting the delivery of renewable energy and low carbon technology.
- para. 97 – Local Authorities need to have a positive strategy to promote energy from renewable and low carbon sources. Further, they need to design policies to maximise renewable and low carbon energy developments **while ensuring that adverse effects are addressed satisfactorily including cumulative landscape and visual impacts** (my emphasis).
- para. 98 advises that Local Planning Authorities (LPA's) should "approve the application if its impacts are (or can be made) acceptable". There is an important footnote to this paragraph which restates the phrase 'unless material considerations indicate otherwise', from Section 38(6) of the Planning and Compulsory Purchase Act 2004.

3.11 National Policies EN1 and EN3 also have relevance. (NB The footnote to EN3 Paragraph 2.6.3 states - *For clarification, any reference within this NPS to offshore wind farm infrastructure includes all the elements which may be part of an application, including wind turbines, all types of*

foundations, **onshore** and offshore **substations**, anemometry masts, accommodation platforms and **cabling**.)

Other relevant local issues

Coastal Country Park

3.12 The area between Mablethorpe/Sutton on Sea/Sandilands and Chapel St Leonards is being designated as a Country Park. It is a County Council Initiative, supported by East Lindsey District Council. The stated vision and aims of the Coastal Country Park (set out in the 2009-2012 Strategic Business Plan) are;

The vision:

A dynamic and extensive Coastal Country Park, along the Lincolnshire Coast, between Sandilands and Chapel St. Leonards, providing high quality facilities for people and better protection for wildlife.

The Coastal Country Park aims to facilitate

- ***A more sustainable, varied and attractive coastal landscape, rich in wildlife and attractive to visitors and residents in every season***
- ***A new tourism destination with high quality accessible natural green space and opportunities to experience the area's cultural and natural heritage***
- ***An associated visitor or heritage centre, observatories and interpretation points***
- ***A vibrant, diverse and sustainable local community.***

The supporting objectives are to help protect and create;

- A varied and attractive coastal landscape;
- Enhanced extensive and linked wildlife areas;
- An attractive area for visitors and residents in every season;
- A new tourism destination and high quality accessible natural greenspace;
- Opportunities to experience the area's cultural, farming, natural and historical heritage;
- A visitor heritage centre, field observation points all linked to the internet;
- Improved parking and recreational facilities;
- New economic opportunities for business and farm diversification;
- An improved quality of life for local communities

3.13 The establishment of the Coastal Country Park is a long term project that will take many years to bring to fruition. The prospect of a nationally significant engineering project ploughing through unspoilt open countryside despoiling such a precious asset is anathema to LCC. Beyond the initial disruption of construction works there will be a legacy of obtrusive, alien man-made structures including the IEC, inspection covers, substation and the physical connection of the seabed cable to its onshore route via unsullied sand dunes. This puts the whole concept of the Coastal Country Park at risk resulting in a destination which will seem tarnished and diminished in the eyes of the public.

Grazing Marshes Project

3.14 In 2003 the Lincolnshire Coastal Grazing Marshes Partnership was formed. The priority target areas were revised between 2007 and November 2008. The Lincolnshire Coastal Grazing Marshes Landscape Conservation Strategy states that the Coastal Grazing Marsh is a Priority Habitat in the UK Biodiversity Action Plan, and as a Biodiversity

Enhancement Area in the East Midlands Regional Spatial Strategy and the East Midlands Regional Biodiversity Strategy. The nature conservation interest, coupled with the historic interest of the area, means the grazing marshes area has also considerable green tourism potential (e.g. Saltfleetby-Theddlethorpe Dunes National Nature Reserve is one of the most visited tourist attractions in Lincolnshire and in 2002 received over 290,000 visitors, estimated contribution to the local economy being over £8M and supporting 200 Full Time Equivalent jobs).

- 3.15 The Lincolnshire Grazing Marshes Project has attracted Heritage Lottery Funding and currently a Landscape Conservation Plan is being developed to fully engage the local communities and expands upon the Landscape Conservation Strategy that set out the programme of developing the project. A primary tool in implementing the project is the use of High Level Stewardship to promote the retention and establishment of grazing marshes in the targeted areas.
- 3.16 The Coastal Country Park is also seen as complementary to the Coastal Grazing Marshes Project in that it would promote the recreation of pastureland and encourage agricultural practices beneficial to biodiversity. Within these areas are sites of national importance (SSSI's) and local importance.
- 3.17 It is considered that these two initiatives are important to the area as a whole.

Other topics relevant to LCC

Cumulative Impacts

3.18 LCC has been made aware during the earlier part of 2015 that there is to be an application by National Grid Interconnector Holdings Limited and its development partner Energinet.dk for an interconnector between Denmark and the UK known as the Viking Link. Whilst LCC heard from the company at the PIM that there will not be a planning application made before the determination of this DCO application, all parties are well aware that the landfall proposed is likely to be at or near to Anderby Creek and the grid connection will be at Bicker Fen (consent having been granted). That means that the cable route for the Viking Link is highly likely to follow the same cable route as that for Triton Knoll. The constraints acting upon each company will be the same and as such the analysis and conclusions are likely to be the same.

3.19 There would be implications associated with the presence of the cable route for the Viking Link as outlined below. These observations take into account the promoter's indication that the link would not be able to share a corridor with Triton Knoll. It is however likely that the corridors would be relatively close taking into account the proximity of the likely landing points for the two projects and their common interface at Bicker Fen. The principal implications would relate to:

- a) The presence of above ground installations at the two landing points within the Coastal Country Park.
- b) Construction-related impacts such as noise, dust and visual impact associated with installation of the below ground cable routes.

3.20 The impacts associated with item a) would be long-term and would potentially relate to localised ones of visual impact, loss of local habitat and, subject to micro-siting relative to property, to noise. In all three instances the proposals for both projects would be likely to include

measures such as landscaping, habitat creation and noise mitigation if required to reduce impacts.

- 3.21 The implications of impacts associated with item b) for the schemes in combination would vary according to the programming of the two projects. Should construction be contemporaneous the order of the short-term impacts would be greater than for either of the projects in isolation. They would, however, be of relatively short duration and would, in the first two instances be the subject of routine mitigation measures which are well established for such work.
- 3.22 Whilst we accept that the two schemes are not connected, the impression that will be given if these two schemes go ahead perhaps only weeks or months apart, using the same route, will be that a duplication of works will be inevitable and that unnecessarily disruptive and expensive impacts will be inflicted on the local population. It will be seen as similar to roads that are dug up time after time by different utility companies. An obvious and sensible question will query why the same route and trench cannot be shared by both operators? There will be a cumulative impact on both the environment and the agricultural industry. In the submissions to be heard by the panel, we ask that considerable pressure be put on both the applicants and those responsible for the Viking Link to work together to save time, money and public anger.
- 3.23 LCC also makes the point that the Viking Link impact is in addition to existing and proposed offshore and onshore wind farm developments which result in an increasingly industrial landscape and seascape influenced by the Skegness Offshore Array, clearly visible from the shoreline and a number of approved and operation onshore wind farms at Conisholme Fen (20 turbines), Bamber's Farm/Mablethorpe (16 turbines), and 6 other turbines around Croft, Ulceby, Yarbrough and Tetney.

Sibsey Northlands Lancaster Memorial

3.24 A matter that has emerged relatively recently regarding the cable route is its proximity to the Sibsey Northlands Lancaster Memorial. The memorial relates to a crashed Lancaster bomber in WWII where lives were lost and not all recovered. The site is therefore seen as a 'war grave'. The proposed route does not pass through the memorial field, but the circumstances of the crash are not fully known at present and debris (and perhaps even ordnance) may have spread beyond the immediate crash site. LCC wishes assurance and guarantees that any works in the vicinity of the crash site will be undertaken with the utmost care and respect. In particular the area should be hand worked by metal detectors prior to any works.

Tourism and Economic Impact

3.25 The value of tourism to East Lindsey's economy is calculated at £ 556 million (2014, STEAM Multi-Area Comparison) comprising 44% of the Lincolnshire total. The importance of tourism to the coast has been set out above. However it merits a separate mention here, setting out those elements which have a bearing on the scheme;

a) Country Park/Grazing Marsh Project

LCC needs the Panel to be content that the proposals do not prejudice the aims, objectives or attractiveness to contributors to or visitors of the schemes.

b) Anderby Creek

LCC needs the Panel to be content that the work timescales envisaged by the scheme do not have a detrimental impact upon the attractiveness and economy of Anderby Creek.

c) Traffic getting to and from the coast.

Whilst there is a rail link to Skegness, by far the most used mode of transport to the coast is the private motor car. The roads carry the life blood of the coast – visitors. LCC has been assured by the applicant that all crossings of roads by the cable route will be undertaken by means of directional drilling under the carriageways. LCC needs the Panel to be content that such an assurance is 'copper-bottomed' and that, if not, the timing of such crossings takes place outside the holiday season. LCC would not tolerate traffic chaos on the routes into or out of the coastal resorts.

3.26 A key concern for LCC is the likely disparity between cost and benefit of the scheme. All the environmental and human cost will be borne by the people of Lincolnshire whilst the economic benefit of turbine manufacture, transport offshore, assembly and maintenance will benefit the Humber "energy estuary". A proposed sum of £ 500,000 in capital and £ 40,000 pa in revenue (25 years) has been offered by the applicant as a community benefit. This is a paltry amount in the context of an engineering project worth £ 3 billion and should be increased significantly to provide lasting benefits to local people should the electrical system be approved. In particular, projects to enhance the grazing marshes and apprenticeships in construction trades should be provided for young job seekers.

Soil Conditions

3.27 I refer to the written representation of Jonathan Wood on behalf of LCC (County Farms). In summary it is clear from reviewing the application documentation that there are very significant areas where TKOWFL has not demonstrated detailed consideration of significant areas of potential adverse impact, nor explained how these issues can be mitigated.

- 3.28 A lack of proper consideration to the practical issues that will arise from the projects works, and therefore the mitigation measures described within the Triton Knoll Environmental Statement are not adequate to address our concerns. Coupled with the deficient public consultation and inadequate physical survey work, this gives rise to major concerns by the affected parties.
- 3.29 TKOWFL should be asked to demonstrate consideration of the potential damage to the soil structure and agricultural land drainage as set out above, in particular detailed data in respect of soil types and structure, and localised agricultural land drainage. Basic and readily available evidence has either been ignored or not considered. A project of this magnitude must not be approved without the full and proper consideration that is paramount to protect and preserve the interest parties.
- 3.30 TKOWFL should be held to account to address the apparent disparity between Project Hornsea (as a direct comparable offshore Wind Farm) and Triton Knoll. A justification is required for why the requirement for the permanent easement for the onshore cables for Triton Knoll 60 metres wide. This results in the temporary exclusion of approximately 367.0 hectares of land from its current agricultural land use during the construction phase. Evidence suggests that the 60 metre width could be reduced to coincide with (or less than) the permanent easement requirement for Project Hornsea.
- 3.31 In evidence Project Hornsea suggests that the width (and possibly length) of the Triton Knoll onshore electrical cabling route could be considerably reduced, given the similar capacity of the two projects, this would in turn would reduce the volume of agricultural land to be affected.

3.32 TKOWFL should be required to demonstrate why an alternative onshore route for the underground electrical cables cannot be considered. This would mitigate the impingement upon a 60 km long area of high quality agricultural land.

Highways

3.33 LCC is working with the applicant to ensure the proper implementation of Access and Traffic Management Plans. This will ensure that the proposed scheme, should it go ahead, provides the necessary routing, signposting and restricted access according to the latest industry standards of good practice. Guaranteeing the safety of the public is of paramount concern to LCC.

4.0 CONCLUSIONS

4.1 The preparation of this Local Impact Report has been made easier by the agreement to a statement of common ground. Where there is agreement, there is no need to be repetitive. As such LCC has concentrated on specific impacts that can be identified over which we raise concerns, namely:

- a) Landscape impact
- b) Tourism impact
- c) Project specific impact
 - i) Coastal grazing marsh project
 - ii) Country Park
- d) Sibsey Northside Memorial
- e) Cumulative impact of Viking Link
- f) Soil Conditions
- g) Highways

