

**From:** [Paul Tame](#)  
**To:** [Triton Knoll Electrical System](#); [Stella Perrett](#)  
**Subject:** 151005 EN020019 NFU - WR and Notification to speak at ISH  
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**Attachments:** [Triton Knoll submission 051015.docx](#)

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Please find attached version 2 of the NFU's written representations (which should replace version 1 attached to my email of October 2) about the application by Triton Knoll Offshore Wind Farm Limited for an Order granting Development Consent for the Triton Knoll Electrical System. We would like to speak at an issue specific hearing because of the importance of the project and potential damage to 200 or so farmer landowners' and tenants' businesses along the cable duct route from Anderby to Bicker Fen in Lincolnshire.

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APPLICATION BY TRITON KNOLL OFFSHORE WIND FARM LIMITED FOR AN ORDER GRANTING  
DEVELOPMENT CONSENT FOR THE TRITON KNOLL ELECTRICAL SYSTEM

WRITTEN REPRESENTATIONS BY THE NATIONAL FARMERS' UNION

1. The NFU has 4,800 farmer and grower members out of the 6,000 commercial farmers who farm more than 50 hectares in the East Midlands region. We note that TKOWFL has contacted 114 landowners so far about the cable duct project. We have no reason to believe that the 80 per cent membership rate indicated by the regional figure above should not be replicated along the cable route. We would also point out that TKOWFL has not contacted farming tenants along the cable duct route who will be similarly affected to landowners. The members affected by the project who we have talked to at local branch meetings and individually have raised the following issues which we will expand upon in our representations below:-

Routeing of the cable duct.

Land drainage and the depth of the cable duct.

Siting of jointing bay link boxes.

Other projects using the same route, e.g. the Viking Link.

A lack of consultation.

2. Routeing.

The project involves laying 6 large cable ducts over a width of 60 metres along 60 km of the most productive Grade 1, 2 and 3a land classification farmland in Lincolnshire and the whole country. The ducts will be buried so most farming operations can take place on top of them, admittedly, but as set out below, farmers are extremely concerned that their land drainage and soils will be permanently affected by the development. This is why we have asked TKOWFL to look at alternative routes to the Anderby to Bicker Fen proposal. Our favoured alternative route is to go onshore at Killingholme, North Lincolnshire, into the disused gas power station which is scheduled to be used by National Grid to anchor another wind farm, where there is a relatively short connection between the coast and the National Grid electricity transmission system. TKOWFL has tried to argue against that route by saying that it is more expensive and longer. But if the cable was laid across the Silver Pit trench in the North Sea it would be a shorter route. In addition, we do not believe that TKOWFL has taken into account the actual cost of burying all the cable ducts below farmers' land drainage systems, reinstating those land drainage systems, paying compensation where those systems do not work properly in the future and making wayleave payments for many years in the future. In some places the cables will need to be laid up to 20 metres in depth and thrust bored to go under major pieces of infrastructure like the Hobhole Drain. In other words, it is considerably cheaper and more environmentally friendly, in our view, to lay the cable on the sea bed than through intensively farmed land. This would also assist with the cooling of the cables.

We also have a particular issue for the cable duct routeing at Anderby Creek. If the cable must come ashore at Anderby Creek, farmers and the local community want it to come

ashore south of Anderby Creek rather than to the north. The environmental quality of the land is the same to the south and to the north of Anderby Creek. But more agricultural land and more Internal Drainage Board drains will be affected by the northern route. Even the Lincolnshire Wildlife Trust which owns the land to the south of Anderby Creek agrees that the cable duct should go through its land rather than to the north.

### 3. Land drainage and depth.

The largest underground infrastructure farmers ever usually experience through their land is a 42 inch (1 metre) diameter water or gas pipeline and few farmers have these. These pipelines usually take one year at most to build. This project is equivalent to six of these pipelines laid in parallel and close proximity and will take four and a half years to complete according to Table 5-6 of Volume 3 of the Environmental Statement. We have seen nothing like it in this country in terms of the effect on farming. Water and gas pipelines and (we hope) these cable ducts will be laid at a depth which allows most normal agricultural operations to take place above them once the construction phase has happened.

The major potential lasting damage is to land drainage systems and soils structure. This is briefly alluded to in paragraph 5.55 of Volume 3 of the Environmental Statement but is not done any justice there. One of the main reasons for the productive land the cable duct route is going through is that the farms are very well drained by a network of clay or plastic land drains laid in parallel every 20 metres or so across the field at depths of up to 1.8 metres draining into a field edge ditch or dyke. These drainage systems prevent water pooling in fields and increase the productive capacity of the agriculture in the area enormously. Good land drainage increases farm productivity by keeping waterlogging to a minimum, increasing soil strength by reducing water content, gives higher soil temperatures and leads to more efficient use of applied fertilisers. According to the Agricultural Notebook the yield advantage for most crops when comparing drained and undrained treatments is typically 10 to 25 per cent.

Assuming land drains are laid every 20 metres in farmland (they are laid more closely in some cases) and assuming the whole route is farmland, which it is not, but it mainly is, the cable ducts will cut 3,000 land drains in six places for each land drain.

Major pipeline constructors will cut a trench and the land drains then place the pipeline in the trench and re-connect the land drains above the pipe. It is a drainage rule of thumb that with a major pipeline one in every six land drains does not work after the soil is replaced around the pipe. Applying this rule of thumb to this cable duct route, every land drain could be affected along the route of the cable duct. This will not just affect the 60 metre width of course, but potentially the whole field where the cable duct goes through and therefore every arable field along the route.

TKOWFL has stated in a newsletter for farmers and landowners entitled "Information for Landowners and Occupiers Winter/Spring 2014" that they will lay the cable duct below field drainage systems. But in some cases this implies laying the cable duct at a depth of 2 metres or more. We believe TKOWFL wants the cable to be nearer the surface so that the heat from the cables can be dissipated more efficiently and so that the construction work is cheaper.

Then there is the issue that the Fens in this area are still sinking.

We believe that works to alleviate the effects of cutting field drainage systems need to be specifically included in the Development Consent Order, but this has not been done as few,

if any, farmers and landowners have been approached by TKOWFL about land drainage issues on their farm.

The issue of land drainage is so important to farmers along the route that we believe TKOWFL should produce a Statement of Common Ground with the Lincolnshire Association of Agricultural Valuers (LAAV), Country Landowners Association and the NFU that covers how land drainage should be treated in principle on every farm, before, during and after the cable duct construction. We have a similar agreement with Transco for the construction of gas pipelines. The importance of land drainage to all the farmers along the route is such that the LAAV and NFU wish to bring a drainage expert to the examination hearing.

4. Jointing bay link boxes. These will need to be placed at least every 600 or 1,000 metres on each of the cable ducts as these are the two lengths of cable available for this project. Having seen similar installations on the cable duct route through farmland near Sutton Bridge, Lincolnshire they are a hazard to farm machinery. TKOWFL will not want them run over or hit by farm machinery and therefore they need to be put in places that are convenient to farmers, presumably in field boundaries or uncropped areas. However, we suspect that they will be placed where the cable runs out, i.e. literally every 600 or 1,000 metres along the route. This will inevitably mean that most of the link boxes will be in fields and subject to damage and extra costs for farmers in avoiding them and not cropping areas of land around the obstruction. It would be extremely helpful to have the siting of link boxes as part of the Statement of Common Ground agreement mentioned above in Section 3.
5. Other projects using the same route. If this route is established there will be a temptation for other operators to use a similar route to connect their wind arrays offshore with the National Grid. There is also talk that the Viking Link Interconnector cables between Denmark and the UK will follow a similar route from the coast to the National Grid network with proposals being put forward as early as 2016. This will multiply the problems mentioned above for the farmers affected by the Triton Knoll cable route. This “superhighway” effect with more and more cables being added with wider and wider easements being taken with consequent disruption and loss of agricultural land, even whole farms. This will cause blight and affect land values because of the amount of land affected.
6. Consultation. Several farmers have complained to us and their local Council that TKOWFL has not consulted with them about its proposals, which they should have done at this stage of the project. Out of the 114 landowners contacted TKOWFL is only making good progress with 3 and it has still to make any contact with any of the farmer tenants of the land in question. There will be many tens of farm tenants affected by this route.

Paul Tame, Regional Environment and Rural Policy Adviser, NFU East Midlands Region, October 2, 2015