

# TRITON KNOLL CABLE GROUP

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## **1. INTRODUCTION**

1.1 The Triton Knoll Cable Group (TKCG) represents broadly the majority of impacted landowners, occupiers and those residents and communities most effected along the length of the proposed route landing at Anderby within the boundary of East Lindsey District Council, to the proposed site of the Bicker substation located on land within Boston Borough Council jurisdiction.

Triton Knoll Cable Group has also received consistent feed-back from the communities and community representatives along the cable route notably at Anderby, Orby and Bicker, who have voiced their legitimate concerns with regards to RWE (TKOWFL) & more recently Statkraft's joint proposal.

1.2. TKCG has actively engaged in briefing meetings and cooperated with local representatives' of the National Farmers Union (NFU), members of the Lincolnshire branch of the Central Association of Agricultural Valuers, (CAAV) and the Country Land Owners Association (CLA) along with Members of Parliament Victoria Atkins Louth & Horncastle & Matt Warman Skegness & Boston, whose constituencies the cable route passes through.

## **2. CONSULTATION**

2.1 After considering feed-back from impacted parties within the communities Triton Knoll Cable Group finds that the consultation questionnaire issued by RWE is deeply flawed and unacceptable in the prescribed format.

a) Whilst accepting that the proposal comprises of many component parts which RWE may consider require responses, the overall content comprising of restrictive the pre framed questions, seriously restrict the respondents responses to create the potential of a predetermined outcome, initiated and progressed by the developer.

b) The selection of the sample questions within the 7 sections are extremely limited to minor in several cases inane detail, e.g. in section 3, this is limited to types of screening planting and the design and external colour scheme of the IEC & substation.

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c) Section 7 The Consultation, this section is totally unacceptable in that there is no obvious question inviting the respondent to either support or object to the proposal or to enable the respondent to outline any reasons for objecting to the proposal.

2.2 TKCG consider this negates the validity of this consultation and submits that the process has failed to be open and even handed and TKOWFL cannot be considered to have met the requirements of the pre-application consultation process in full.

2.3 Therefore TKCG considers that the pre-application consultation is by definition inadequate and by necessity should be judged to be unacceptable.

2.4 TKCG is also aware of a complaint issued by Lincolnshire County Council expressing concerns regarding the consultation process.

### 3. TKCG's COMMENTS ON ASPECTS OF THE DCO APPLICATION

3.1 TKCG have assessed the Environmental Information and Non Technical Summary and considers that the EIA Outcomes and Key Conclusions of the Assessments Summary Tables (Table 17-1 to Table 17-12) contained within Volume 2 Chapter 17 totally lacks credibility.

The submitted repetitive conclusions of *Not Significant* throughout these tables clearly demonstrate and highlight a consistent dismissive approach by stating '*No additional mitigation measures are proposed beyond embedded mitigation measures*'

An example of TKOWL consistent assessment approach can be clearly demonstrated in the Access field:

*Access Minor adverse, which is Not Significant.*

*No additional mitigation measures are proposed beyond embedded mitigation measures.*

*Minor adverse Not Significant*

### 4. VIKING LINK INTER CONNECTOR PROJECT

4.1 Triton Knoll Cable Group has submitted a statement to the ExA drawing attention to further documentation detailing initial proposals for the Viking Denmark to Bicker Interconnector route. This the serious issue of potential cumulative impacts remain a issue between the landing point at Anderby Creek and grid connection at Bicker Fen.

4.2 TKCG still maintains the position that the imperative to consider both of the Triton Knoll Cable Route impacts in conjunction with the published proposals for the Viking Interconnector route, remains, even though a statement was made by the Lead Examiner at the Preliminary Inquiry meeting held on the 3rd of September that no planning application will be submitted by National Grid Viking Link Ltd during the time scales of the DCO hearings for the Triton Knoll cabling.

4.3 TKCG will continue to monitor all activities by TKOWFL and National Grid Viking Link Ltd (NGVLL) both jointly and independent of each other throughout the DCO process and retains the right to make further submission when appropriate information is forthcoming.

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4.4 TKCG has also made an application to DECC for full disclosure of information regarding these projects and again reserves the right to make further representations to the ExA once these enquiries have been concluded.

4.5. TKGC position remains the same that these two projects should not proceed independently of each other, without the commissioning of detailed cumulative EIA's by both developers', along with further joint consultations.

4.6. TKCG therefore confirm that the local communities **have no confidence** that the submission made by TKOWFL at Para 4.79 (extract below) is a true representation of the position now and at that time.

*4.79 In October 2014 TKOWFL became aware of a project to interconnect the UK and Danish transmission systems. The project, named Viking, is being promoted by National Grid Interconnector Holdings Ltd. At the time of application, TKOWFL is aware that National Grid Interconnector Holdings Ltd has a GCA with National Grid for an interconnector capacity of 1.2 GW at the existing National Grid Bicker Fen substation. Until more information is placed into the public domain by the developer, it is not possible for TKOWFL to comment on the likely cumulative impacts of this project alongside TKES. TKOWFL will keep up to date with information as it is released, but at present there is no indication of the consenting programme or timescales for the Viking Interconnector Project.*

### 5. THE EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS

5.1 TKCG @ Alt 1.1 below had identified this issue as a matter before the ExA requiring explanation & was due to raise this relevant issue as requiring a response from the Applicant.

#### 5.2 at Alt Alternatives – the decision making process Alt 1.1 Interface selection Applicant

*In Paragraph 4.15 of APP-023 (6.2.1.4 Site Selection and Alternatives) it is acknowledged that the role of the interface selection assessment is to identify all potential onshore interface connection points.*

*However, in paragraph 5.2 of APP-018 (ES Non-Technical Summary), it is stated that “an offer was made by National Grid Electricity Transmission in January 2012 for connection to the existing substation at Bicker Fen”.*

*a) Specify the role that National Grid had in the choice of the on-shore interface point*

*b) State whether Bicker Fen was chosen as a result of conclusive environmental, technical and financial considerations, as referred to in paragraph 4.3 of APP-018, **or because it was the only on-shore interface point offered by National Grid?***

5.3 TKCG when appraising the DCO application, drew the distinct impression that the whole proposal was prepared and submitted on the basis of this one option from the National Grid that Bicker pre determined as the grid connection point and that the application was made to fit the required outcome and not a step by step elimination process arriving at the most suitable proposal in terms of cost effectiveness and the reduction to an acceptable minimum of the disruption and damage to all of the affected interested parties interests.

### **SILVER PIT ISSUE**

5.4 The applicant states @Para 4.45;

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4.45 Offshore cable corridors were developed from the TKOWF array to each of the seven landfall options (the shortlist) set out in Table 4-2, having regard to the following key offshore considerations:

☐ key seabed features exhibiting a high degree of sediment mobility and/or representing a significant constraint to cable installation, (for example the Silver Pit seabed feature);

4.48 SEtech's report advised that significant weight should be placed on the risks arising from a number of offshore and coastal constraints, principally:

☐ engineering challenges associated with cable burial across the Silver Pit seabed feature, owing to the steep slopes;

☐ outcrops of rock which can hinder cable burial;

☐ No potential conflict with other schemes, particularly the Hornsea offshore wind project and its associated OFTO converter/ substation and cable assets, whose position was unknown at the time of the Interface Selection Assessment;

5.5 Further-more TKCG draw attention to ExA question below which we had already identified as a potential contradiction;

*Alt 1.25 Silver Pit*

### **Applicant**

*Appendix B (SETech report) of APP-120 (8.18 Triton Knoll Interface Selection*

*Assessment Report) says that the existence of the Silver Pit is a high risk because of the potential slope angle of the Pit and the difficulty in laying the cable.*

*a) Notwithstanding those difficulties, are there design solution which could allow for cabling across the Silver Pit?*

*b) Comment on whether and how Hornsea offshore wind farm would deal with the Silver Pit?*

5.6 For reference TKCG has examined the following document from Smart Wind's offshore connection route from Hornsea Project One scheme landing point at Horseshoe Point within East Lindsey.

*Project One Environmental Statement*

*Volume 4 – Introductory Annexes*

### **Annex 4.4.1**

#### **Offshore Export Cable Route Selection**

**PINS Document Reference: 7.4.4.1 APFP Regulation 5(2)(a)**

*July 2013*

*<http://infrastructure.planningportal.gov.uk/wp-content/ipc/uploads/projects/EN010033/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/7.4.4.1%20Offshore%20Export%20Cable%20Route%20Selection.pdf>*

5.7 Figure 10.1 HORNSEA EXPORT CABLE OVER VIEW page 30 within this ES submission to the Planning Inspectorate, clearly details the export cable traversing the central area of The Silver Pit, this document is dated July 2013 during the period TKOWFL where aware of the Smart Wind DCO application.

5.8 Further proof of this is contained at Para Interface Selection Assessment Report

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April 2015. Document Reference 8.18

*4.3.15. Therefore at the commencement of the Interface Selection Assessment, SMartWind was already committed to locating, and connecting to, a proposed converter station in the vicinity of Killingholme. TKOWFL identified a high likelihood that SMartWind would seek a northern Lincolnshire landfall which might also lead to potential onshore and offshore cabling conflicts. Whilst TKOWFL was aware that SMartWind would ultimately refine its cable route and converter station location, this process was likely to be extensive and endure well beyond the Interface Selection Assessment. TKOWFL's particular concern was that, whilst some level of communication would be possible between the two parties, SMartWind's work would already have progressed a year ahead of TKOWFL before the Interface Selection Assessment was complete and therefore SMartWind would be in a position to secure the most satisfactory cable route and converter station location that might leave highly undesirable alternatives remaining for the Triton Knoll electrical connection. Furthermore, if SMartWind was to bring forward further connections into northern Lincolnshire during the Interface Selection Assessment, TKOWFL would be at a significant disadvantage to the second Hornsea project, which would be able to coordinate internally with its sister Project One.*

5.9 It is apparent that there is conflicting information, firstly that TKOWFL unfoundedly asserted the Silver Pit cannot be traversed & secondly that for unconvincing perceived commercial reasons both Smart Wind and TKOWFL would be unable to develop a mutually convenient engineering solution to navigate their joint cables through this area of the sea bed to take a northern route to Killingholme or South Grimsby thus avoiding Anderby to Bicker.

### **5.10 REASSESSMENT OF GRID CONNECTION IN THE LIGHT OF RECENT ANNOUNCEMENTS**

*4.60 In the final comparative assessment National Grid and TKOWFL attributed significant weight to the likely environmental impacts of the Humberside Reinforcements and/or an entirely new National Grid substation. Furthermore options connecting into northern Lincolnshire area (Killingholme South and South Humber Bank) were anticipated to create greater impacts on the basis of their greater length compared with Bicker Fen.*

### **5.11 EXAMINATION QUESTION**

*Alt 1.8 Interface selection*

#### **Applicant**

*It is suggested in Relevant Representations, for example RR-80 and RR-9, that capacity exists at Killingholme and Great Grimsby substation following closure power stations in the area.*

*Explain whether the situation has changed since the ES was written and whether capacity now exists at substations at Killingholme, South Humber Bank, Humber Refinery and Grimsby West.*

*State whether the Environmental Statement needs to be updated and re-appraised.*

TKCG awaits with interest the outcome from this ExA question.

### **6. SUBMISSION BY TKCG DETAILING CURRENT LAND OWNER EXPERIENCE OF CABLING FOR THE DUDGEON OFF SHORE WIND FARM.**

6.1 TKCG intends to call William & Mary Runciman who are directly affected farming landowners in North Norfolk, who are to provide detailed relevant evidence in person & writing to the ExA, detailing the real issues and concerns arising from the Dudgeon off shore wind farm cabling.

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6.2 The wind farm export electrical cabling currently under construction for this offshore wind farm, is routed through the land on the Runciman's farming holding. TKCG consider that the Runciman's detailed current and on-going experience is extremely relevant to the TKOWFL DCO application, particularly as the recently named additional party to the Triton Knoll cable route DCO application STATKRAFT, is also one of the partner developers to the Dudgeon Offshore Wind Farm Ltd, as referenced below;

*(The two Norwegian companies, Statoil and Statkraft, acquired the Dudgeon Offshore Wind Farm project in October 2012 through the acquisition of all the shares in Dudgeon Offshore Wind Limited, a subsidiary of the UK energy company Warwick Energy Limited. In August 2014 <http://www.dudgeonoffshorewind.co.uk/> )*

*RWE Innogy and Statkraft agree partnership deal for Triton Knoll Offshore Wind Farm 13.02.2015 10:00 - See more at: <http://www.statkraft.com/media/press-releases/20151/rwe-innogy-and-statkraft-agree-partnership-deal-for-triton-knoll-offshore-wind-farm/#sthash.HNx5vW0d.dpuf>*

6.3 TKCG draws attention to APPEAL Ref APP/Y2620/A/12/2170245:

*Appeal Ref: APP/Y2620/A/12/2170245 Route between Weybourne Hope and Little Dunham, Norfolk*

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.*
- The appeal is made by Dudgeon Offshore Wind Limited against North Norfolk District Council.*
- The application, Ref. PF/09/1270, is dated 18 December 2009.*
- The development proposed is described as a 45km buried cable system running between the landfall point at Weybourne Hope (North Norfolk District) and a new electrical substation to the south of Little Dunham (Breckland District).*

6.4 The Inspector at Para 18 stated:

### **Land use implications**

*18. Where the cable route passes through farmland there would be a short-term impact on farming practise. With an assumed working corridor of 40m this would affect within North Norfolk some 108ha or 0.11% of the total agricultural land within the district<sup>2</sup>. Concerns have been raised about impact on soil structure, field drainage and potential soil heating and how these might impact on crop production and livelihoods. An industry-standard system of contractual compensation would cover disruption and loss as a result of the construction works, the objective being that those affected would be put back in the position they would have been in if the works had not taken place. The route has been designed and modified as far as possible to keep to field margins and boundaries to minimise possible disruption.*

*19. Having regard to soils, as already mentioned above, a condition requiring the provision of a Soil Management Plan has been suggested. This would involve a detailed soil survey along the cable route prior to development and would include the provision of information on land drains, prediction of the risk of soil erosion, ground conditions and soil temperatures around and above the cables when in use, together with measures to minimise impacts on growing crops and overlying soil. The Plan would also require details of soil stripping, handling, storage and re-instatement to ensure no deleterious impacts and the successful re-instatement of soils. The method of providing the cable in sections would permit flexibility to vary the design to eliminate any predicted excess thermal impact.*

***20. From the evidence provided, and with such a detailed study and implementation of agreed proposals within it, I consider it reasonable to assume that there would be unlikely to be any significantly harmful impacts on individual farm holdings. Furthermore, as indicated at the Inquiry, compensation for any loss occasioned by the development is open-ended and would***

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*provide a fall-back. Should it transpire that the operational cable route was having deleterious effects on farming practise or production these payments would be applicable.*

6.5 TKGC assert that actual reality and evidence brought to the ExA on behalf of TKCG's interested landowner parties to the DCO application by the Runciman's is of significance, to inform the ExA and to provide clarity and assist an informed judgement as to whether or not the proposal has been adequately assessed and that in the event of a consent order being granted, whether or not the applicant has;

a) Sufficient expertise to meet the provisions set out above informed by on their past track record and that;

b) Enable the imposition of the requisite control and monitoring to ensure that the landowners-tenant farmers interest are fully met and that any failure to meet these conditions in full, to the specified standards are rectified without limits to the relevant costs incurred and further-more compensation is paid in full without delay.

### 7. CONCLUSIONS

7.1 TKCG respectfully expects the ExA to fully consider all the submissions on behalf of the landowners by the previously named organisations and indeed the landowners and tenant farmers (highlighted by NFU's submission) themselves.

Likewise all submissions by the community representatives and affected residents particularly, those at Anderby, Orby and Bicker Fen.

TKCG is fully aware of the concerns and issues relevant to each of these locations and supports the separate submissions made by these interested parties.

*7.2 With reference to Annex B, if you would like a compulsory acquisition hearing to be held or wish to be heard at an open floor hearing please notify the Planning Inspectorate on or before Deadline 1, Monday 5 October 2015.*

*Any interested parties wishing to attend a hearing should indicate in their written representations which topics they wish to address at the hearing.*

TKCG wish to give notification to the ExA that the Chairman Melvin Grosvenor may wish to make verbal representations as and when necessary, at each of the open floor hearings.

7.3 Triton Knoll Cable Group formally submits **OBJECTION** to the proposed cable route on the basis the TKOWFL has not provided convincing evidence that the proposed cable route is justifiable and the most suitable option available .

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or by post

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