

From: [Nick Feltham](#)
To: [Triton Knoll Electrical System](#)
Cc: [Vanda Pollard](#); [Mark Williets](#); [Jonathan Henson](#)
Subject: 151005 EN020019 North Kesteven DC - Local Impact Report and Written Representations
Date: 05 October 2015 17:13:08
Attachments: [Written Representations.docx](#)
[LIR.docx](#)
[Written Representations - summary.docx](#)

Dear Sir, Madam

Please find enclosed North Kesteven District Council's Local Impact Report and Written Representations in relation to the DCO application for the Triton Knoll Electrical System.

Consistent with the request within Annex D of your letter dated 30th July 2015, the District Council wishes to express its interest to attend and if necessary be heard at the open floor hearing/s in relation the landscape and visual and noise impacts of the proposed substation. The District Council's response to the ExA's first written question on the landscape and visual impact of the proposed substation is contained within the attached Written Representation.

Please do not hesitate to contact me if you need to discuss anything further,

Regards

Nick Feltham
Principal Planning Officer
(01529) 414155
www.n-kesteven.gov.uk

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NORTH KESTEVEN DISTRICT COUNCIL

Planning Act (2008)

**Application by Triton Knoll Offshore Wind Farm Limited for an Order Granting
Development Consent for the Triton Knoll Electrical System**

Local Impact Report on behalf of the District Planning Authority

5th October 2015

Planning Inspectorate Reference: EN020019

District Planning Authority Reference: 10031767 and 15/0763/NSIP

1.0 Details of the Proposal

- 1.1 The proposals are to develop the electrical system required to connect the Triton Knoll Offshore Windfarm to the existing national grid at Bicker Fen, Lincolnshire. The scheme comprises a number of elements associated with the landfall of the required underground cable, the erection of an intermediate electrical compound at Orby, a new onshore substation to the north west of the village of Bicker and a connection to the existing national grid at Bicker Fen.
- 1.2 The element of the proposal of most relevance to North Kesteven District is the erection of the new substation at Bicker Fen, and the associated impacts of such works. The substation will comprise a range of electrical equipment some of which is expected to be located externally within compounds and some of which will be housed within buildings. The substation could comprise a building/s of up to 13m in height, along with electrical plant and equipment of a lesser height, depending upon whether the substation is air or gas insulated (AIS or GIS).

2.0 Site Description

- 2.1 In relation to the proposed substation, the site comprises otherwise undeveloped agricultural land accessed by minor roads, and is located north west of the village of Bicker, Lincolnshire. The site is within the floodplain and is located adjacent to the South Forty Foot drain which forms the administrative boundary between North Kesteven District and Boston Borough.
- 2.2 A longlist of 19 sites were identified within a 5km study area around the existing Bicker Fen National Grid Substation, and as a result of public consultation and a number of initial technical studies and assessments, four shortlisted zones were identified, one of which was located within North Kesteven District. The proposed substation site is within the Blue Zone, lying entirely within Boston Borough Council's administrative area.

3.0 Relevant Planning History and Relevant Development Proposals

- 3.1 As the site is not located within North Kesteven District, we have no site history pertinent to the development proposals. However, the Council considers that the Environmental Statement and associated reports identify (and assess where required) all relevant schemes within North Kesteven District for cumulative impact purposes, including the Heckington Fen windfarm and associated electricity transmission project and the Viking Interceptor scheme; the latter two of which are not yet subject to applications for a DCO. As the Examining Authority will be aware, the revised scheme for the Heckington Fen windfarm comprises the erection of up to 22 turbines with a maximum tip height of 125m.

4.0 Relevant Policies of the Saved North Kesteven Local Plan

The District Council considers that the following policies of the saved North Kesteven Local Plan are of relevance to the proposals:

Policy Reference	Subject	Summary
C2	Development in the Countryside	Advises that planning permission will be granted for proposals subject to a number of criteria being met, including that those proposals will maintain or enhance the environmental, economic and social value of the countryside and will protect and where possible enhance its character
C5	Effects upon amenities	Advises that planning permission will be granted for proposals provided that they do not adversely affect the amenities enjoyed by other land users to an unacceptable degree
C10	Flood risk	Advises that planning permission will be granted for proposals only if they will not be at unacceptable risk of flooding or would unacceptably increase flood risk elsewhere
C17	Renewable energy	Advises that planning permission will be granted associated with the generation or distribution of renewable energy only where, amongst other things, the economic, social and environmental impacts can be satisfactorily addressed, and the proposals minimise landscape and visual impacts (including through siting, design and landscaping)
C18	Design	Advises that planning permission will be granted for proposals only if, amongst other things, they will reinforce local identity, not adversely affect the character or appearance of its surroundings and that the proposal responds satisfactorily to its context in terms of layout, scale, massing, external appearance and the use of materials
C19	Landscaping	Advises that planning permission will be granted for proposals provided that appropriate provision is made for landscaping which, amongst other things, satisfactorily integrates the development with its surroundings
C22	External lighting schemes	Advises that planning permission will be granted for proposals only where, amongst other things, the lighting scheme will not adversely affect the amenities of nearby land-users or the character of the area
T4	Safety	Advises that planning permission will be granted for development proposals that will not adversely affect the safety of people using roads, cycleways, footpaths, bridleways or railways
LW1	Landscape conservation	Advises that the Council will seek to protect the distinctive landscapes of the identified Landscape Character Areas, and that where development is acceptable it will, amongst other things, be expected to be well integrated into the local

		landscape character
HE5	Development affecting the setting of a Listed Building	Advises that planning permission will be granted for proposals that will not adversely affect the setting of a Listed Building

5.0 The North Kesteven Landscape Character Assessment (LCA) 2007

5.1 The Council commissioned a Landscape Character Assessment that was subsequently adopted in September 2007. The LCA contains a detailed assessment of the character, distinctiveness and qualities of the landscape of the District. Whilst the proposed development site lies outside of the North Kesteven District boundary, the landscape characteristics of the site are essentially the same as those within the immediately adjoining 'Fenland' North Kesteven Landscape character area, which terminates on the western side of the South Forty Foot Drain. The Council's adopted Landscape Character Assessment (LCA) highlights a number of key characteristics for the Fenland character area, including;

- A low lying and generally flat relief
- Very large arable rich fields divided up by drainage channels
- Generally extensive vistas to level horizons and huge skies
- Sparse woodland cover though some occasional trees surrounding farmsteads and some shelter belts
- Prominent power lines and large scale agricultural buildings

5.2 Paragraph 9.1.11 of the Council's LCA highlights that industrial and commercial uses are largely absent within the Fenland sub-area, however like other parts of the District the impact of electricity infrastructure is also significant with rows of pylons very dominant within the landscape. Page 99 of the LCA highlights a number of pressures for change and opportunities for enhancement within the Fenland landscape character area, with pressures for change including 'large scale agricultural buildings and storage of agricultural machinery' which can be 'very prominent in the open landscape'. Reference is also made to inappropriate species such as *Leylandii* having been used to screen existing buildings, and which creates an incongruous feature within the landscape)

6.0 The North Kesteven Strategic Flood Risk Assessment (SFRA)

6.1 The Council also commissioned a Strategic Flood Risk Assessment that was subsequently adopted in November 2009. The SFRA updates the original district-wide SFRA produced in 2002, and amongst other things undertook a number of breach scenario modelling, to include the 'Lower Witham Fens' study area. Whilst the geographical extent of the SFRA is limited to North Kesteven District, the Lower

Witham Fens study area runs to the westernmost boundary of the District, immediately adjacent to the South Forty Foot drain.

- 6.2 Paragraph 15.56 of the SFRA notes that the greatest source of flood risk is from overtopping or a breach of the flood defences within the Fens area, which includes the embanked South Forty Foot Drain. Paragraph 15.60 of the SFRA notes that, allowing for freeboard, the River Witham flood defences in the lower Witham Fens are not provided to a 1:100 year standard, and that the annual probability of flooding varies across the Fens from between 1%-5%. The closest part of the Lower Witham Fens Study Area to the site is shown as having a flood hazard mapping rating of 'danger for some'.

7.0 Assessment of Compliance with the Policies of the Saved North Kesteven Local Plan

Saved Local Plan policy	Nature of Impacts and Assessment of Compliance
C2	Negative – whilst the Environmental Statement has identified some positive impacts associated with employment generation during the construction phase, by virtue of the size of the substation site (regardless of the selected AIS or GIS option) and the stated height of the range of buildings and structures proposed, the Council considers that the proposal would fail to preserve or enhance the character or appearance of the countryside when viewed from within North Kesteven District. In the Council's view, this would outweigh any positive social or economic impacts upon the residents of the District.
C5	Negative – pending further clarification of the low frequency noise external to internal transmission losses at Drove Farm, the Council considers that the proposal may create an adverse noise impact upon occupiers of Drove Farm. In addition, whilst no highway routes associated with the erection of the substation are expected to experience 10% or greater increases in traffic flows during construction, noise impacts associated with construction vehicle movements (in particular along the A17 and A153 within North Kesteven) are still predicted to be 'minor adverse'.
C10	Neutral – subject to the imposition of flood risk mitigation measures, the proposals are not expected to result in increased flood risk to residents and properties within North Kesteven District. The Council does however highlight that in their opinion alternatives to the internal layout of the substation area have not been fully evidenced, and which <i>may</i> have included options to site the most vulnerable plant and equipment within any comparatively lower risk parts of the substation site (accepting however the topography/levels within the site).
C17	Negative – pending further assessment of potential low frequency noise impacts to Drove Farm, the Council considers that the social and environmental impacts of the proposal have not been fully satisfied. The Council also agrees with the applicant's assessment that landscape and visual impacts when viewed from within North Kesteven District will be 'adverse'.

C18	Negative - by virtue of the size of the substation site (regardless of the selected AIS or GIS option) and the stated height of the range of buildings and structures proposed, the Council considers that the proposal would fail to preserve or enhance the character or appearance of the countryside when viewed from within North Kesteven District.
C19	Neutral – subject to the preparation of a detailed soft landscaping scheme which avoid repetition of incongruous shelterbelt planting that is found elsewhere within the Fenland landscape character area, it is considered that scope exists in principle to establish an appropriate landscaping scheme
C22	Neutral - subject to the preparation of a detailed external lighting scheme which does not adversely affect the amenities of nearby land-users or the character of the area, the proposals would accord with saved Local Plan policy C22. It is noted 24 hour lighting will not be required except during exceptional circumstances when essential repairs and maintenance may be required.
T4	Neutral - it is noted that no highway routes associated with the erection of the substation are expected to experience 10% or greater increases in traffic flows during construction. Subject to the imposition of the draft Requirements, an access and construction environment management plan would be provided to ensure that the safety of users of the public highway through the District (in particular the A17 and A153) is not compromised during the construction phase.
LW1	Negative - by virtue of the size of the substation site (regardless of the selected AIS or GIS option) and the stated height of the range of buildings and structures proposed, the Council considers that the proposal would fail to protect or be well integrated with the Fenland Landscape Character Area when viewed from North Kesteven District. Whilst from some of the Viewpoints the substation would be viewed against the backdrop of the Bicker Fen windfarm and associated substation, nevertheless as a result of the scale of the site and extent of built development proposed, the Council considers that the proposals would visually conflict with some of the key characteristics of the Fenland character area, including its low lying and generally flat relief and generally extensive vistas to level horizons and huge skies. Existing electricity infrastructure is already noted in the LCA as a local landscape detractor. In the Council's view, this would outweigh any positive social or economic impacts upon the residents of the District.
HE5	Neutral – the proposals would have no impact on the setting or significance of designated heritage assets within North Kesteven District.

7.1 Having regard to the issues that are discussed in greater detail in the Council's Written Representations, the Council considers that the negative (adverse) social and environmental impacts upon the District and its residents associated with the construction of

the Bicker Fen substation are greater than the associated economic impacts. In particular, the District Council considers that the predicted impacts of operational noise on the closest residential property within the District (Drove Farm) cannot be fully relied upon in the absence of further justification for the transmission losses (applied dB reduction) from external to indoor areas at the 100Hz level. The noise modelling results demonstrate a compliance with adopted criterion of only 2dB.

- 7.2 In addition, by virtue of its scale and the extent of built development proposed, the Council considers that the proposals would visually conflict with some of the key characteristics of the Fenland landscape character area, including its low lying and generally flat relief and generally extensive vistas to level horizons and huge skies. Notwithstanding the stated AIS and GIS options, the Council considers that additional information could have been provided in the assessment of alternative site layout/s including the arrangement of buildings, electrical plant and equipment in order to demonstrate whether opportunities better exist to reduce both landscape and visual and noise impacts. It should be noted however that we offer no comments on the relative technical merits and detailed appraisal carried out leading to the selection of the 'Blue Zone' as the preferred location for the substation.
- 7.3 In the Council's opinion therefore, insufficient information has been provided to demonstrate that the economic effects of the proposed substation outweigh its **social** and **environmental** impacts.

8.0 Impact of DCO Obligations or Requirements on North Kesteven District

- 8.1 Paragraph 10.1 of the Council's Written Representation contains a commentary on a number of the draft Requirements. Subject to these observations being considered and weighted by the Examining Authority as part of the determination of the DCO (in particular the Council's concerns in relation to low frequency noise at Drove Farm and associated Requirement 17), the Council does not consider that the impacts of the Requirements will be unduly harmful to the District' interests.