



# Triton Knoll Electrical System

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**Appendix 27: Lincolnshire  
Coastal Country Park  
Clarification Note**

**Date: October 2015**

**Appendix 27 of the Applicant's  
Response to Deadline 2**

Triton Knoll Offshore Wind Farm Limited

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Park Clarification Note

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Date: 27 October 2015

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## 1. LINCOLNSHIRE COASTAL COUNTRY PARK

### Introduction

- 1.1 This clarification note has been prepared in respect of Triton Knoll Offshore Wind Farm Limited's (TKOWFL, or the Applicant) application for a development consent order (DCO) under the Planning Act 2008 (the Application).
- 1.2 This note seeks to demonstrate, by way of drawing together and summarising parts of the Application, how the Applicant has given consideration to potential impacts arising from the proposed Triton Knoll Electrical System (TKES) onshore works, how consideration of the Lincolnshire Coastal Country Park (LCCP) has informed the assessment of potential impacts and the agreements that have been reached with various stakeholders in relation to the LCCP.

### Relevant Representations

- 1.3 Relevant Representations, submitted under section 56 of the Planning Act 2008 (the 2008 Act) identified concerns from Interested Parties (IPs) in relation to the LCCP. Table 1 provides a list of IPs that have raised concern in their representations.

**Table 1 – Interested Parties that are concerned by potential impacts on the LCCP**

Relevant Rep. No.	Interested Party	Relevant Representation Extract
RR-008	East Lindsey District Council	Impact on the Coastal Country Park and the tourism industry for East Lindsey - in particular to ensure that the cable route and associated works do not interfere with the free flow of traffic to and from the coast, particularly in the holiday season.
RR-016	Triton Knoll Cable Group	As we are now living in a developing Country Park, why must we have disruption to our tourist area by having plant machinery on small unsuitable roads to the area.
RR-020	Barry Stuart Westley	As we are now living in a developing Country Park, why must we have disruption to our tourist area by having plant machinery on small unsuitable roads to the area.
RR-045	Eamonn John Hayes	...it is not appropriate to route the cable through the coastal country park.
RR-054	Anderby Parish Council	Disturbance of land through the Coastal Country Park, Grazing Marshes and heritage land.

<b>RR-080</b>	<b>Vanessa &amp; Colin Davie</b>	The landfall of cables at Anderby Creek in the middle of the Coastal Country Park is a total disgrace and the company has failed to listen to residents and councils alike.
<b>RR-166</b>	<b>Lincolnshire Wildlife Trust</b>	Our main concerns relate to the siting of the cable route through two target areas of the Lincolnshire Coastal Grazing Marshes (LCGM) project and the Lincolnshire Coastal Country Park (LCCP)...

- 1.4 The Applicant has responded to all Relevant Representations in Appendix 1 of the Applicant's Response Deadline 1. In response to general points raised in relation to the LCCP the Applicant provided the following information:

*"Impacts on the Lincolnshire Coastal Country Park are considered in Volume 3, Chapter 2 Landscape and Visual (document reference 6.2.3.2) and Volume 3, Chapter 3 Socio-economic, Tourism and Recreation (document reference 6.2.3.3) of the ES."*

- 1.5 This clarification note seeks to expand on this response in order to provide further detail on the Applicant's consideration of the LCCP.

### Further Representations

- 1.6 Issues in relation to the LCCP have also been raised in further representations submitted in response to the Examining Authority's (ExA) Rule 6 letter and to examination Deadline 1. Table 2 provides a list of further representations submitted which raise concern in relation to the LCCP.

**Table 2 – Further representations made by Interested Parties that are concerned by potential impacts on the LCCP**

	<b>Interested Party</b>	<b>Representation Extract</b>
<b>Additional Submission AS-017</b>	<b>Huttoft Parish Council</b>	This proposed area is on the edge of the Coastal Country Park. This is a tranquil & unique area, rich in nature and the Sea Bank Clay Pit have large flocks of birds who return each year to nest on the Reserve. This development would disturb the birds & prevent them nesting due to the disruption in this area.

<p><b>Local Impact Report &amp; Written Representation</b></p>	<p><b>East Lindsey District Council</b></p>	<p><b>Coastal Grazing Marsh Project and Country Park</b></p> <p>4.1 East Lindsey District as part of its commitment to the local economy and its objective to both broaden visitor appeal and extend the visitor season, supports the aims and objectives of both the Country Park and the Coastal Grazing Marsh Project. Whilst East Lindsey District is not the prime mover in either of these initiatives, they wish to lend their weight to concerns that have been expressed at pre-meetings and in writing. The Country Park is lent policy support by virtue of Policy C15 of the extant East Lindsey Local Plan.</p> <p>4.2 In the same way that the landfall site is affected, there will be significant visual effects along the whole of the cable route for the whole of the construction period. The cable route passes through the Coastal Country Park and the areas that have been flagged for the Coastal Grazing Marsh Project. Again, ELDC will require reassurance and guarantees that adequate mitigation is contained within the scheme to ensure that the purposes of the Country Park and the aims, aspirations and objectives of the Grazing Marsh Project are not prejudiced or diminished.</p>
<p><b>Local Impact Report</b></p>	<p><b>Lincolnshire County Council</b></p>	<p>See paragraph 3.2 – 3.5, and paragraph 3.12 for background information set out by Lincolnshire County Council.</p> <p>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.</p>

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## Background

- 1.7 The LCCP is defined as the 8 km stretch of coast between Sandilands to the north of the TKES landfall location and Chapel St. Leonards to the south of it. The park area is shown in Maps 1 – 2 of Figure 1-4 of Volume 5, Annex 3.1 *Socio-Economic Baseline Study* of the Environmental Statement (ES) (document reference 6.2.5.3.1).
- 1.8 The LCCP has no national or local statutory designations for nature or landscape conservation. However, it is recognised as having local importance for recreation and for the promotion of local tourism. The Application has given consideration to the potential impacts on the LCCP through the assessment of the following topics in the ES, these are:
- Volume 3, Chapter 2, *Landscape and Visual* (document reference 6.2.3.2);
  - Volume 3, Chapter 3, *Socio-economics, Tourism and Recreation* (document reference 6.2.3.3); and
  - Volume 3, Chapter 4, *Terrestrial Ecology* (document reference 6.2.3.4).

## Site Selection and Alternatives

- 1.9 Representations made in relation to the LCCP relate in some cases to the overall site selection for the proposed works and the selection of the landfall and cable route through the Park.
- 1.10 The Applicant has described the site selection process in Volume 1, Chapter 4 *Site Selection and Alternatives* of the ES (document reference 6.2.1.4), which provides information relating to the siting of the landfall and cable route. Further detail is provided in Chapter 4 of the Site Selection and Design Report (document reference 8.17).
- 1.11 Table 4-2 of Volume 1, Chapter 4 of the ES provides a summary of the main environmental and consenting risks associated with each landfall option that was considered. Table 4-3 provides a risk rating for the engineering risks that were associated with each of the landfall options. The LCCP is identified as an issue for the Anderby Creek landfall location and was considered as a key constraint in the determination of the most suitable landfall location.
- 1.12 The Applicant has followed an approach in assessing and choosing the landfall and cable route location options which is appropriate for a development of this scale. In response to Alt 1.23 of the ExA's first written questions, the Applicant has confirmed that one of the principal intentions of the site selection work undertaken was to minimise impacts to existing land use through the wider development area. Wherever possible the Applicant has sought to locate the TKES in such a way as to avoid or minimise disruption.

- 1.13 Although the option of the Beeches Farm landfall location may appear to be less environmentally constrained than the chosen Anderby Creek; the Applicant's response to Questions Alt 1.23 and Alt 1.24 of the ExA's first written questions provides details of the implications on flood defences at Beeches Farm.

### **Consultation in relation to LCCP pre-application**

- 1.14 The LCCP was raised by several consultees in relation to tourism impacts at Scoping and PEI consultation and was discussed within the Triton Knoll EIA Evidence Plan Steering Group. Table 3-2: Summary of Consultation relating to Socio-Economics, Tourism and Recreation, of Volume 3, Chapter 3 of the ES provides details of the points raised by those consultees and a response from the Applicant which highlights how the point has been addressed within the Application.
- 1.15 The LCCP was also raised by consultees in relation to terrestrial ecology; Table 4-2: Summary of Consultation relating to terrestrial ecology, of Volume 3, Chapter 4 of the ES provides details of the points raised by those consultees and a response from the Applicant detailing how potential terrestrial ecology impacts have been considered within the Application.
- 1.16 Lincolnshire County Council (LCC) responded to PEI consultation stating that the landscape character area *J1: Tetney Lock to Skegness Coastal Outmarsh* had been attributed a low value which was an "underestimation of the sensitivity of the landscape". In response, the Applicant increased the value attributed in the assessment to medium.
- 1.17 The Consultation Report (document reference 5.1) submitted with Application provides full details of all statutory and non-statutory consultation undertaken pre-application.

### **Impacts Assessment – Landscape and Visual**

- 1.18 Landscape and visual impacts are considered in Volume 3, Chapter 2 of the ES; landscape character areas have been defined using several landscape character assessments, details of which are presented in Volume 5, Annex 2.1, *LVIA Technical Baseline Report* of the ES (document reference 6.2.5.3.1).
- 1.19 Table 1-5 of Volume 5, Annex 3.1 of the ES provides details of the landscape character areas that have been assessed and identifies the LCCP as a landscape character feature of *J1: Tetney Lock to Skegness Coastal Outmarsh*.

### **Landscape Effects during Construction**

1.20 Paragraph 2.400 of Volume 3, Chapter 2 of the ES states that there are no landscape designations within the character section *J1: Tetney Lock to Skegness Coastal Outmarsh*. However, the Applicant recognises that the creation of publically accessible open space within the LCCP is considered to be strategically important to promote local tourism. The *J1* character area is therefore considered to have local value as a landscape open to the public for recreation. The value of the landscape been considered to be *Medium*.

1.21 Paragraph 2.403 concludes that: *“it is considered that there will be a Moderate level of landscape effect during construction within this landscape area. Based on the judgement on the level of effect, it is considered that the effect will be Significant.”*

### **Visual Effects during Construction**

1.22 Paragraphs 2.437 – 2.442 of Volume 3, Chapter 2 of the ES consider the visual effects on the character area *J1: Tetney Lock to Skegness Coastal Outmarsh* during construction. Paragraph 2.438 confirms that users of the LCCP are expected to experience notable change to the character and quality of their view during construction. As the duration of visual change will be medium to long term it is concluded that *“users of the Coastal Park are therefore identified as experiencing a Moderate adverse level of effect which is considered to be Significant.”*

### **Landscape Effects during Operation**

1.23 Table 2-22 of Volume 3, Chapter 2 of the ES summarises the landscape effects during the operational phase of the proposed development. At year 1 it is anticipated that there will be minor adverse effects on landscape character and at year 15 that there will be neutral effects on landscape character both of which are *Not Significant*.

### **Visual Effects during Operation**

1.24 As there is no above ground infrastructure proposed within the area of the LCCP, and the onshore cables will be buried there is no opportunity for visual effects during the operation of the proposed development. The Applicant notes that there will be an area of raised ground by up to 1.5 m above existing ground level in the arable field on the landward side of the sand dunes at the landfall to accommodate the transition joint bays. However, once construction is complete and the land used temporarily for construction has been reinstated this ground will be similar in appearance to earth bunds which are typical within the locality. Paragraph 7.14 of the Outline Landscape Strategy and Ecological Management Plan (LSEMP) (document reference 8.8) secured in Requirement 6 *Provision of landscaping* of the draft DCO (document reference 3.1) states:

*“The completed TJBs will appear similar in appearance to earth bunds which are typical within the locality, beside drains, albeit smaller in scale and with two manhole covers (1.1 sq m) evident above ground”*

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- 1.25 Requirement 20 *Restoration of land used temporarily for construction* of the draft DCO (document reference 3.1) secures that any land used temporarily for construction of the onshore works must be reinstated in accordance with details approved by the relevant local authority.

### ***Landscape Effects during Decommissioning***

- 1.26 Paragraph 2.744 of Volume 3, Chapter 2 of the ES concludes that there are no significant landscape effects predicted during the decommissioning activities as those activities will be limited to a short duration and therefore have limited influence on the surrounding character.

### ***Visual Effects during Decommissioning***

- 1.27 Paragraph 2.745 of Volume 3, Chapter 2 of the ES concludes that there will be limited potential for decommissioning activities to give rise to visual effects on surrounding receptors and therefore no significant visual effects are predicted during decommissioning.

### ***Mitigation and residual effects***

- 1.28 Table 2-35 of Volume 3, Chapter 2 of the ES summarises the predicted landscape and visual impacts of the cable route. As moderate adverse landscape and visual effects on the landscape character area in which the LCCP is situated are predicted during construction only, no additional mitigation measures (above those already embedded into the project design, set out in Table 2-14 of Volume 3, Chapter 2 of the ES) are proposed as, following the completion of construction, the residual effects are predicted to be neutral, which is *not significant*.

## **Impact Assessment – Tourism and Recreation**

- 1.29 Details of the LCCP have been taken in to consideration Volume 5, Annex 3.1 *Socio-Economic Baseline Study* of the ES (document reference 6.2.3.3.1); section 1.3 provides detail of the sources of data that have been used to inform the baseline study and this includes the LCCP.

### ***Construction phase***

- 1.30 Paragraph 3.148 of Volume 3, Chapter 3 of the ES states that: *“There will be a temporary impact on the availability of a small area within the Huttoft Target Area of the Lincolnshire Coastal Grazing Marsh (LCGM), and on parts of Lincolnshire Coastal Country Park (LCCP) during the construction period. The areas that will be disrupted will be the areas that lie within the Proposed Development Boundary.”*

Paragraph 3.154 of Volume 3, Chapter 3 of the ES concludes in relation to construction phase impacts that: *“The overall recreation and tourism effect for the landfall is minor adverse, which is Not Significant.”*

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- 1.31 Paragraph 3.161 of Volume 3, Chapter 3 of the ES concludes in relation to construction phase impacts that: “Overall the recreation and tourism effect for the onshore cable route, Intermediate Electrical Compound and Substation is minor adverse, which is Not Significant.”

#### ***Operational phase***

- 1.32 Paragraph 3.169 of Volume 3, Chapter 3 of the ES concludes in relation to potential operational phase impacts that: “*Overall the recreation and tourism effect for the Landfall, Onshore Cable Route, Intermediate Electrical Compound and Substation is negligible, which is Not Significant.*”

#### ***Decommissioning phase***

- 1.33 Paragraph 3.170 of Volume 3, Chapter 3 of the ES states in relation to decommissioning phase impacts that: “The impacts during decommissioning are not considered significant in terms of socioeconomics and this phase has been scoped out of the assessment, as agreed by PINS in its Scoping Opinion (document reference 8.1).”

#### ***Mitigation and Residual Effects***

- 1.34 As no significant recreation and tourism impacts have been identified there is no need for any mitigation measures in relation to recreation and tourism aspect of the LCCP.
- 1.35 In relation to site selection and alternatives the Applicant has confirmed, in response to Question 1.24 of the ExA’s first written questions that it “*considers that a landfall at Beeches Farm would have a greater impact on amenity of tourists and residents in the section of the coastline at Beeches Farm than at Anderby Creek owing to the very built up and congested nature of this stretch of coastline and the proximity of a very large number of static caravans denoting a high level of tourist activity*”.

## **Impacts Assessment – Terrestrial Ecology**

### ***Approach to Impact Assessment***

- 1.36 The habitats within the LCCP with terrestrial ecology value are covered within the Existing Environment section of Volume 3, Chapter 4 of the ES and therefore have been assessed alongside all other effected habitats. However, the LCCP is not covered under the designated sites section of the Terrestrial Ecology chapter because it is not designated for reasons of nature conservation importance.

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1.37 Table 4-17 of Volume 3, Chapter 4 of the ES details the mitigation measures which have been embedded into the project design in order to minimise the terrestrial ecology impacts. This includes an Ecological Management Plan (EMP) which is secured through Requirement 13 *Ecological management plan* of the draft DCO (document reference 3.1). An Outline Landscape Strategy and Ecological Management Plan (LSEMP) was submitted with the application (document reference 8.8) which sets out the principles with which the final EMP must accord.

## Consultation in relation to LCCP post-application

1.38 The Applicant has agreed and submitted Statements of Common Ground (SoCG) with statutory and some selected non-statutory consultees. The following sets out agreements made in relation to the LCCP.

### Natural England (NE)

1.39 A SoCG with NE was submitted as Appendix 18 of the Applicant's response to Deadline 2.

1.40 Paragraphs 4.27 to 4.61 of the SoCG sets out agreements in relation to the approach to the assessment of Landscape and Visual impacts.

1.41 Paragraphs 4.62 to 4.95 of the SoCG sets out agreement in relation to the approach to the assessment of Terrestrial Ecology. Paragraph 4.68 of the SoCG specifically states:

*"It is agreed that the approach to assessing potential ecological impacts on the Lincolnshire Coastal Country Park (LCCP) as set out in Table 4-2 of Volume 3, Chapter 4 of the ES, that the habitats are included in the existing environment but that they are not specifically assessed as the LCCP is not designated specifically for reasons of nature conservation importance, is appropriate."*

### Lincolnshire Country Council (LCC)

1.42 A SoCG with LCC was submitted as Appendix 30 of the Applicant's response to Deadline 1.

1.43 Paragraphs 4.23 to 4.66 of the SoCG sets out agreements in relation to the approach to the assessment of Landscape and Visual.

1.44 Paragraphs 4.67 to 4.87 of the SoCG sets out agreements in relation to the approach to the assessment of Socio-Economics, Tourism and Recreation.

1.45 Paragraphs 4.88 to 4.112 of the SoCG sets out agreement in relation to the approach to the assessment of Terrestrial Ecology. Paragraph 4.95 specifically states:

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*“It is agreed that the approach to assessing potential ecological impacts on the Lincolnshire Coastal Country Park (LCCP) as set out in Table 4-2 of Volume 3, Chapter of the ES, that the habitats are included in the existing environment but that they are not specifically assessed as the LCCP is not designated specifically for reasons of nature conservation importance, is appropriate.”*

### **East Lindsey District Council (ELDC)**

- 1.46 A SoCG with ELDC was submitted as Appendix 20 of the Applicant’s response to Deadline 2.
- 1.47 Paragraph 6.1 to 6.34 of the SoCG sets out agreements in relation to the approach to the assessment of Landscape and Visual, paragraphs 6.27 to 6.29 confirm that ELDC agree to the assessment of landscape and visual impacts arising from construction for the cable route and landfall.
- 1.48 Paragraphs 7.1 to 7.21 of the SoCG sets out agreements in relation to the approach to the assessment of Socio-Economics, Tourism and Recreation, and confirms ELDC’s agree that the impacts on tourism and recreation are minor adverse and therefore *not significant*.
- 1.49 Paragraphs 8.1 to 8.21 of the SoCG sets out agreement in relation to the approach to the assessment of Terrestrial Ecology.

### **Conclusions**

- 1.50 The details drawn out of the assessment and presented in this clarification note lead to the following conclusions:
- 1) There are three potential ways in which the proposed development may have an impact on the LCCP. These are landscape and visual impacts; tourism and recreation impacts; and terrestrial ecology impacts.
  - 2) Consultees raised issues in relation to the LCCP during Scoping and PEI consultation and the application demonstrates where these issues have been acknowledged and addressed pre-application.
  - 3) The agreed description of the LCCP is that it is it a council promoted project with no national or local statutory designations.
  - 4) The LCCP has been adequately considered through the site selection and alternatives process for the proposed development.

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- 5) Volume 3, Chapter 2 of the ES assesses the landscape and visual impacts predicted on the LCCP. The assessment identifies some temporary significant landscape and visual effects within the LCCP during the construction of the cable route. However, embedded mitigation measures within the proposed cable route development will restore the landscape to its former condition following completion of construction and there are no predicted residual significant effects.
  - 6) Volume 3, Chapter 3 of the ES assesses the tourism and recreation impacts predicted in the area of the LCCP and concludes that no significant impacts are predicted to arise from the construction, operation or decommissioning of the proposed development.
  - 7) Volume 3, Chapter 4 of the ES assess the terrestrial ecology impacts including within the LCCP, however given the LCCP is not designated for nature conservation purposes is has not be assessed as a designated site, however the habitats within it have been assessed. This approach is supported by Natural England.
- 1.51 The Applicant considers that, on the basis of the above conclusions, the LCCP has been adequately and proportionately considered in the assessment.