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Tritton Knoll Offshore Wind Farm Ltd

9th February 2016

To whom it may concern

Dear sir / madam

Re:- Registration Identification Number 10031842 - (Deadline No.5)

Re:- Site E / Field 6

I write regarding the above field and in response to the outcome of the meeting held on 19th January 2016 and also to Appendix 13: Lincolnshire Coastal Grazing Marsh - Field 6 / Site E clarification note - issued 1st February 2016.

Meeting held 19th January 2016

One of the key questions I asked at the meeting is why R.W.E have chosen to plan their cable route through the middle of this important wetland habitat site of which the response was a lot of spurious talk about mitigation and 'engineering difficulties', but what the 'engineering difficulties' were they did not say. The same question was put to them again, this time the explanation given was that by laying the cables along the roadside boundary it would make the wetland leak and so it was better to go through the middle of the field, my response to this is having constructed the site myself this explanation is completely untrue. There is no logical reason to lay the cable through the middle of this site !. I would add to the above that even their own construction expert said that the cheapest and best engineering route is on flat level ground which the roadside boundary offers. To cut open trenches through the middle of the field across the water filled channels is a more difficult engineering route **FACT!**.

Another option discussed to cross the field was by 'horizontal directional drilling' but this was deemed to be more of an engineering risk. I have spoken to a horizontal directional drilling contractor who's response was that he could see no problem in carrying out this work (please refer to attached copy email from A.M.S no dig).

With regards to a statement of common ground received from Lincolnshire Wildlife Trust, they clearly state that their preferred option is to use horizontal directional drilling, their second preference was to use the roadside boundary route. They have also noted that they have only agreed to mitigation measures if planning permission is granted to go through the middle of the site.

I would like to point out to yourselves that apart from farming I manage a plant hire and civil engineering business which I have run for 30+ years, we have a lot of experience in creating wetlands for farmers, The Royal Society For The Protection Of Birds and for various wildlife trusts

throughout the country. We are also experienced in pipe laying across open countryside (similar to this scheme), and in 2014 we completed one of the largest irrigation schemes in Europe, which involved water storage reservoirs and the laying of 32km of pipes, so my point being is that I do know what I am talking about when I am making my representations.

Appendix 13: Lincolnshire Coastal Grazing Marsh - Field 6 / Site E clarification note. (1st Feb 16)

I would like to respond to the above document as follows :-

1) Risks to future water levels with the route through the middle of the field :- The soil profile in this field is a 300mm depth of topsoil with varying levels of clay subsoil 1m to 2m then a peat layer of varying depths, under the peat layer is marine sediments of very soft sand and silts. If you were to dig trenches through the middle of the water filled channels as per the construction method proposed (R.W.E have said will be 1.2m below the channels and the trench will be approximately 2.4m below the original ground level), this will result in the clay layer and waterproof seal being broken, there is also a very high risk that this would lead to water loss in the future. Should this be the case my renewal into the higher level stewardship scheme will be rejected, the field will have to be reverted back to arable use, the whole field will be re-drained and the habitat will be lost for good.

2) *Ref 4.8 (10m stand off) - for road side boundary route.*

This is unnecessary for the following reasons :-

The Environment agency do not enforce a 10m rule, it is only a guide which is dependant on conditions and size and the importance of the water course.

Production of a method statement and risk assessment

Safe operation of plant by qualified personnel.

The water course is approximately 1.4m deep and so any risks are small. The method statement and risk assessment will cover this.

Pollution - This should not be a problem on a well run site. In addition the ditch could be bunded at each end if this was deemed to be a problem.

Roadside Boundary Route

To place the construction fence 2m from the roadside ditch bank top and to have a 40m working width would result in an area of 1.45 HA being taken up, this is 27.7% of the total field size of 5.22 HA. By using this route there would be a lot less disturbance to wildlife and will result in a lot less disruption than cutting the field in two.

There is an area of approximately 15m from the roadside ditch to the end of the water channels. The trenches will still need to cross the end of the channels, however if after reinstatement it is found that water loss is occurring it is much easier to rectify than if the problem was in the middle of the field.

I would be quite willing to dig a test hole to show them the soil profile if they wish.

In Summary

Because the applicant chose the route without proper consultation they should use horizontal direction drilling across the site as it is this method that will overcome all of the problems. By using this method they would follow the guidelines set by the secretary of state which say that habitats must be protected where reasonably practicable (2.1). In my opinion it is reasonably practicable to do so.

From an engineering point it is possible to horizontal directional drill this site. The applicant will have to on this project horizontal directional drill under sea banks, rivers, railway lines and water courses so there is no reason why they should not use this method to cross my field.

With this letter I have enclosed some pictures which were taken on the 7th of February 2016 and show the level ground alongside the roadside boundary and the water filled channels (please note the Curlew).

Please note that I will not be contactable between the 11th and 23rd of February, however I await your responses accordingly.

Yours faithfully

Andrew Spence

 Print**Content of the message**

From:	"Mickey Spooner" <mickey.spooner@amsnodig.com>
To:	"sales@spenceplant.co.uk" <sales@spenceplant.co.uk>
CC:	"Pete Guillatt" <pete.guillatt@amsnodig.com>
Date:	Nov 27 2015, 12:50 PM
Subject:	Burgh le Marsh wet land

▼ Show full header

Andrew

As per our discussion today a very quick guide line for the supply and installation of 6No x 340m x 355mm ducts in single shots Budget 400 to 450k, ground conditions described as peat wet land overlaying soft blue clay. This ground is described as a wild life habitat for birds ect. Please bear in mind the price of ducting could significantly change over two years dependant on polymer prices.

Regards Mickey.

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