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Examining Authority
National Infrastructure Planning
The Planning Inspectorate

17 February 2016
Dear Sir/Madam

TRITON KNOLL ELECTRICAL SYSTEM – REF 10031863

WRITTEN RESPONSE TO THE THIRD WRITTEN QUESTIONS

I note that the ExA is seeking confirmation and comments in response to two questions, LVI 3.1 and LVI 3.2, related to Mr Spence's wet grassland known as field 6, site E. I am increasingly concerned over both the short and long-term impact on the site judging by the current RWE proposals.

LVI 3.I
The described dispute over the way in which the site was created appears to have at least in part arisen from an informal meeting I had with RWE. The applicant has criticised my description based on a short verbal meeting. At that consultation, with no agreed or written record of what was said were covered a number of points. These included the importance of the site, the intrinsic value of the central area of the site for wader breeding, and the need for excellent water retention as there is no water supply.

With no pumps or inflow of water and the only means of wetting the site is rainfall. Evapotranspiration varies annually but is around 600 mm/year. Rainfall levels are very similar making it of paramount importance that all precipitation is retained on site. The presence of an impervious clay barrier around the outer parts of the site help achieve this. This water retention is achieved by the existing clay substrates, where undisturbed. This is combined with land drain eradication. The trench in which the pipes are removed is sealed with compacted clay as has been described by Mr Spence.
This is a skilled operation, not least being to locate all pipes from both ancient and modern agricultural underdrain systems. Finding all these pipes, when no plans are available, is difficult and often requires the creation of a trench to ensure no pipes are missed. Arguing over the description of the method of water retention is a diversion. The facts are that the site must have a secure seal to prevent horizontal water loss into the channels surrounding the site. This has been very successfully achieved.

The second crucial part of field 6 success and function as wetland grassland is the prevention of vertical water movement, from the upper field layers into the peat and other

porous seams of underlying substrate. Field 6 has a seam of underlying impervious clay, laid down by natural sedimentation many years ago. A key part of the construction was to ensure that the integrity of that clay layer remained intact. If this is breached then it will allow water loses rather like a drain plug.

From the above description it can be seen that both lateral and vertical water movement must be prevented, in both cases this is dependent on the clay remaining impervious.

Excavating the cable trenches directly through the middle of the field and to a depth that will penetrate the clay substrate is a very high risk strategy. If restoration were to fail due to admixing of the clay or cracks caused by settlement or shrinkage over the cables due to warmth, water will be lost. Furthermore it would be very difficult to find and rectify such issues with further risk to the habitat.

LVI 3.2

A number of points have been raised by the applicant over technical issues regarding the use of a trenchless crossing, the preferred option. It has been proved that a trenchless method is a perfectly viable methodology. Adopting this approach has very low risk of compromising the current very successful water retention and with the added advantage of minimal habitat disturbance if carried out with the correct timing.

There is also the perfectly practical alternative of placing the open cuts technique within a 40m wide corridor along the road side. This has a number of significant advantages over a trenching operation proposed directly through the middle of the site including:

- No damage to the most sensitive core breeding area for waders in the middle of the field 6. The field edge being widely recognised as much less important or viable for breeding waders.
- By routing along the field edge this negates the need to completely dewater the linear channels by simply placing a temporary bund in the end of each feature.
- Repairing the damage to the clay substrate is still very important but less risky because much of the route would avoid passing cables under the aquatic features.
- Using the field edge route does carry some inevitable risk of future water loss both horizontally and vertically. However, because the route would be on the edge of the habitat it would be much easier to find such flaws and rectify with far less additional habitat disruption.
- RWE have made a number of claims about technical difficulties of moving the route to the field edge, all are however technically achievable. For example just to the north of field 6 the route was diverted with much more acute bends, to avoid a pond and trees have been skirted in the adjacent field. Field 6 more than justifies any limited technical difficulties to reduce long-term risk to the important habitat.

- There has been much made by the applicant of the issues of working close to the modest roadside drainage channel to meet EA requirements. Those risks are low and can be mitigated by adopting suitable good practise and placement of temporary soil bunds if a risk developed. If there is a risk in this field site there must be much greater risks to water quality at other cable route locations, such as where they pass close to or have haul roads over the many water courses.

I find it very difficult to understand how the applicant has reached the conclusion that digging 6 deep trenches directly through the middle of a known breeding wader site is acceptable. It is not tolerable and poses a much higher risk to either of the proposed alternatives that are supported by LWT and Mr Spence. Neither is it consistent with what should be expected of a company required to protect the environment on a project of this scale.

Vested interest conclusions by RWE are even more surprising and questionable when they have not had access to the site.
It is also worth pointing out that Mr Spence operates a highly regarded business with massive experience in wetland work and very successful agri-environment schemes, including a number of sites of his own.

The aim must be to reduce the environmental risk to the wet grassland and associated breeding waders by adopting either a trenchless crossing or modest diversion to the field edge.

Yours faithfully

Roger Wardle CEnv MIAgrE

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