



**Triton Knoll Offshore Wind Farm Limited  
Triton Knoll Electrical System**



**Appendix 6: Written Representation  
Response to Burgh le Marsh Town  
Council**

**Date: 29<sup>th</sup> February 2016**

**Appendix 6 of the Applicant's  
Response to Deadline 8**

Triton Knoll Offshore Wind Farm Limited

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Burgh le Marsh Town Council

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Deadline 8

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## 1. Burgh le Marsh Town Council

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1.1 The submission from Burgh le Marsh Town Council received at Deadline 6 raised the following specific issues and concerns regarding potential impacts arising from the proposed development:

1. Impact on local economy and tourism
2. Impact on traffic and pedestrian movements
3. Consultation

### **Impact on local economy and tourism**

1.2 In response to the points raised by the Town Council on impacts to tourism and the local economy, the Applicant refers the ExA to the detailed consideration and assessment provided within Volume 3, Chapter 3 *Socioeconomics, Tourism and Economics* of the ES (document reference 6.2.3.3) and also to the Tourism Clarification Note at Appendix 10 [REP5-023] to the Applicant's submission at Deadline 5.

1.3 As set out at paragraph 3.31 of Volume 3, Chapter 3 of the ES (APP-044), the most contemporary data available was used to undertake the assessment. Local and regional planning documents and background studies, findings from appropriate consultation and publicly available data were all drawn upon to define the baseline conditions across the study area.

1.4 The methodology for the assessment carried out by the Applicant is set out at paragraphs 3.36 to 3.43 of Volume 3, Chapter 3 of the ES (APP-044). The Applicant highlights that the approach taken was agreed within the EIA Evidence Plan process. The entire baseline content was reviewed by the 'Human Environment' Review Panel participants which included representatives from Boston Borough Council, East Lindsey District Council and Lincolnshire County Council (see Appendix I; Annex E3 of the TK EIA Evidence Plan [APP-132]).

1.5 The Applicant has considered a full range of sources of potential effects on socioeconomic, tourism and recreation as set out in Volume 3, Chapter 3 of the ES. The assessment considers the direct and indirect effects on tourism receptors such as those using overnight accommodation sites. The assessment concludes that effects on tourism are minor at most.

1.6 It should also be noted that the Applicant has sought, through the provision of measures set out in the Outline Communications Plan (document reference 8.7.10, [APP-108]), to ensure that all aspects of the construction of the proposed development are made widely available and can be fully understood by local residents, business owners and tourists alike.

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- 1.7 The proposed development has been carefully sited and designed, with specific regard given to minimising impacts to the tourist industry and maximising opportunities to benefit the local and regional economies. Over the entire development process, the Applicant has sought to mitigate the effects of the scheme on tourist destinations and is extremely mindful of the importance of tourism and recreation in Lincolnshire. The various mitigation measures that will be employed are set out in the Applicant's Mitigation Strategy, along with details as to how they are secured through the draft DCO (updated version submitted with the Applicant's Deadline 7 submission [REP7-047]).

### **Impact on traffic and pedestrian movements**

- 1.8 The representation also raises concerns regarding traffic connected with the proposed development.
- 1.9 Table 2 of Appendix 1 of the Applicant's response to Deadline 1 states that the potential impacts on traffic and access have been assessed in Volume 3, Chapter 9 *Traffic and Access* of the ES (document reference 6.2.3.9), concludes at paragraph 9.189 that:

*"...there are no significant adverse effects associated with the construction, operation or decommissioning phases of the proposed development."*

- 1.10 In addition, Requirement 19 of the draft Development Consent Order (DCO) (Revision G) [REP7-018] secures a construction Traffic Management Plan (TMP) and a contractor travel plan. The Applicant would highlight that the TMP will be drafted and agreed with the relevant authorities in line with the principles set out in the Outline TMP; a document submitted with the application (document reference 8.9) and one that has been subject to scrutiny and consultation throughout the examination process.
- 1.11 The Applicant directs the ExA to the Statement of Common Ground with Boston Borough Council (BBC) (Appendix 19 of the Applicant's response to Deadline 2) and with East Lindsey Borough Council (ELDC) (Appendix 20 of the Applicant's response to Deadline 2) which conclude in paragraphs 10.9 and 10.8 respectively that;

*"With respect to mitigation measures it is agreed that in accordance with paragraph 9.189 of Volume 3 Chapter 9 of the ES, given there are no significant adverse effects predicted on traffic and access as a result of the construction, operation and decommissioning of the project, no further specific mitigation is required beyond that which is already embedded into the project design and secured through the management plans that will be secured under the DCO"*

- 1.12 The Applicant further highlights its response to Question **TT 1.12** of the ExA's first written questions explains that Section 4 of the *Outline Traffic Management Plan* (Document Reference 8.9[REP6-030]) includes an outline of the common control measures that will be agreed between the principal contractors and the relevant planning authority before commencement of

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any stage of the Authorised Development. This plan is secured by Requirement 19 of draft DCO (Revision G) [REP7-018]. Requirement 25(1) of the draft DCO obliges the Applicant to comply with the details approved. The final construction traffic management plan will include the precise method of monitoring and enforcement for routing of construction vehicles. Although these details are yet to be agreed, there are a number of techniques that could be applied, including vehicle marking systems, number plate recognition and a reporting hotline.

1.13 The Applicant also notes its commitment to using trenchless crossing techniques for all public road crossings as set out in paragraph 4.19 of the Outline Traffic Management Plan (Revision B) (Appendix 14 of the Applicant’s response to Deadline 6) to minimise the disruption to traffic and to avoid the need to close any roads.

1.14 The Exa’s attention is also drawn to the provisions set out in paragraph 4.14 of the outline Access Management Plan (Revision B) (Appendix 12 of the Applicant’s response to deadline 6), temporary construction compound;

*“... access arrangements would be designed to accommodate two-way traffic and, where appropriate, provide for standing vehicles clear of the through carriageway, sufficient to mitigate queuing on the highway.”*

1.15 Roads will still need to be crossed by construction traffic using the haul road. However, this has been considered through the use of control measures to ensure the safety of highway users and safe movement of construction traffic, which are set out in paragraph 4.18 of the Outline Traffic Management Plan and which will be agreed with the local highways authority.

1.16 Paragraph 4.22 states that;

*“Where reasonably practicable and where it is safe to do so, TKOWFL will aim to maintain access for pedestrians and other non-motorised users along the public highway. Specific locations where pedestrian and other non-motorised user management will be required will be identified in the TMP and AMP.”*

1.17 The Applicant has sought to minimise the impacts of the development of Public Rights of Way. However, as set out in paragraph 3.5 of the Outline Construction Method Statement (Appendix 29 of the Applicant’s response to Deadline 7 (REP7-037);

*“For the safety of the general public, there will be a requirement to temporarily close PRow HUT10/4 for a combined maximum period of 6 months across a number of discrete periods. Closure may be required during periods of landfall access track upgrade works, landfall site establishment and site demobilisation, and during periods of heavy construction traffic use of the access road.”*

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- 1.18 Even so, the Applicant would highlight to the ExA that this is the only Public Right of Way that will need to be closed and that alternative access routes to the coast have been identified to ensure that there is always North-South access the coast in the area.
- 1.19 The Applicant refers the ExA to paragraphs 3.9 to 3.16 of the Outline Construction Method Statement, which sets out how the Applicant intends to minimise impacts on users of the Public Rights of Way and Table 1, which specifies the nature of the disruption and diversions.
- 1.20 The final Traffic Management Plan and Access Management Plan for each stage of the onshore works will be agreed with relevant planning authority and are secured by Requirement 19 and Requirement 8 of the Draft DCO respectively (REP7-018).

## Consultation

- 1.21 The Applicant refers the ExA to the Triton Knoll Electrical System (TKES) Consultation Report (document reference 5.1) [APP-131] which details the extensive non-statutory and statutory consultations undertaken with stakeholders and the changes made to the proposed TKES development as a result of those consultations. Attention is drawn particularly to:
- a) Section 2, Non Statutory Consultation commencing prior to s42/s47 consultation, which includes:
    - i. A subsection entitled '*The Alternatives Consultation*' - a consultation on shortlisted sites for the above ground infrastructure and associated cable corridors, which included 7 public exhibitions attended by 888 visitors;
    - ii. A subsection entitled '*2014 public, landowner and Parish Council consultations*'. This subsection includes an explanation of the '*Onshore cable route consultation*', which was an iterative process of onshore cable route alignment.
  - b) Section 5, Community Consultation under section 47, which includes 6 public exhibitions attended by 293 people;
  - c) Section 8, Non Statutory Consultation after s42/s47 Consultation.
- 1.22 The Applicant has undertaken a robust consultation on the proposed development in accordance with the statutory requirements under the Planning Act 2008 and has made some significant amendments to the scheme following statutory and non-statutory consultation.
- 1.23 As set out in paragraph 6.2 of the Consultation Report (document reference 5.1) Section 43 of the 2008 Act, as amended by the Localism Act 2011 the local authorities which need to be consulted are;

*(1) A local authority is within this section if the land is in the authority’s area.*

*(2) A local authority (“A”) is within this section if—*

*(a) the land is in the area of another local authority (“B”),*

*(aa) B is a unitary council or a lower-tier district council, and*

*(b) any part of the boundary of A’s area is also a part of the boundary of B’s area.*

*(2A) If the land is in the area of an upper-tier county council (“C”), a local authority (“D”) is within this section if—*

*(a) D is not a lower-tier district council, and*

*(b) any part of the boundary of D’s area is also part of the boundary of C’s area.*

1.24 The Applicant refers the ExA to Figure 6.1 and Table 6.1 of the Consultation Report (document reference 5.1) which show the neighbouring authorities consulted as defined under Section 43 of the 2008 Act.

1.25 The local authorities contacted as part of the consultation carried out under section 42 and section 47 of 2008 Act are listed in Appendix 6A of the Consultation Report (document reference 5.1).

1.26 As set out in paragraph 4.9 of the Consultation Report (document reference 5.1) TKOWFL issued a press release as part of the publicity for the consultation taking place to the numerous media outlets and contacts which included:

- BBC East Yorks and Lincs- Look North (East Yorkshire and Lincolnshire);
- BBC Radio Lincolnshire;
- BBC Yorkshire- BBC Lincolnshire;
- Compass FM 96.4;
- Skegness Standard - News Desk;
- ITV Yorkshire - ITV News Calendar Production;
- Lincolnshire Echo;
- ReNews; and
- BBC Radio Sheffield – Newsdesk

1.27 The Applicant highlights that the adequacy of consultation overall has been confirmed in responses received from several neighbouring counties, for example Norfolk County Council, Rutland County Council and Nottingham County Council, with Boston Borough Council stating;

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*“The applicant’s Consultation Report is a very comprehensive, albeit rather lengthy account of numerous publicity and consultation exercises which, in this authority’s view go well beyond the statutory minimum requirements. The pre-application process with this authority has been timely and all encompassing and in terms of local community consultation and publicity this authority is satisfied that the applicants have complied with all of their duties under the 2008 Act.”*

- 1.28 By accepting the Application for examination the Secretary of State has concluded that the Applicant has complied with the section 55 checklist on consultation including s42(1)(b) consulting each local authority within s43.