



20 Western Avenue, Milton Park, Abingdon, Oxfordshire OX14 4SH

T +44 (0)1235 821888 F +44 (0)1235 834698 E rpsox@rpsgroup.com W rpsgroup.com

Our Ref: JNP2216B
Your Ref:

E-mail: gamages@rpsgroup.com
Direct Dial: 01235 838215
Date: 3rd February 2016

Mr David Gedney
Senior Planning Officer
South Holland District Council
Priory Road
Spalding
PE11 2XE

Dear Mr Gedney

Race Bank Offshore Wind Farm

Proposed temporary modification to primary sea defences, installation of 2 x 220kV electricity cables and full reinstatement (amendment to planning permission H18-0102-13)

I write in respect of the above planning application, submitted on behalf of DONG Energy RB (UK) Limited (DONG Energy). DONG Energy purchased the Race Bank project from Centrica Renewable Energy Limited (CREL) in December 2013, and since that time have been developing the onshore and offshore transmission assets, discharging the relevant consent conditions and seeking amendments to existing consents where needed.

This planning application is submitted to seek consent from the Council for revised landfall operations, which have been reduced in scale from the previously approved plans when the project was in CREL ownership.

Relevant sea defence/landfall/inter-tidal consents

As you are aware planning permission was granted in 2013 by South Holland District Council (ref: H18-0102-13) and the Borough Council of Kings Lynn and West Norfolk (ref: 13/00189/FM) for an amendment to the previously approved (under Section 36 of the Electricity Act 1989) inter-tidal/marine export cable and landfall location for the Race Bank project.

Permission was granted for the installation of 4 x high voltage electricity cables beneath the inter-tidal/saltmarsh area north of the primary sea defences, and the temporary excavation and lowering of 4 x separate sections of the primary sea defences to allow the cables to pass through them, before being fully reinstated to their former condition.

Both permissions were subsequently amended under Section 73 of the Town and Country Planning Act 1990 to allow for the implementation of the onshore works and offshore works to commence separately (ref: H18-0304-15 and 15/01400/F). No changes to the approved scope and scale of works were made under those variation applications.



A revised Marine Licence was also issued by the Marine Management Organisation under reference L/2012/00217 for the same package of works.

Proposed revision to the sea defence cable installation requirements

Further to detailed engineering study since the acquisition of the project in December 2013 DONG Energy has determined that the project can now proceed with 2 x 220kV electricity cables instead of the approved 4 x 220kV cables. The sea defence installation design has also been revisited and amended so that the 2 x cables will now be installed through a single temporarily lowered section of the sea defences removing the need to temporarily lower 4 x sections of the sea defence as approved under the previous planning permissions.

Planning permission is sought for the changes in the sea defence installation design. The enclosed 'Consents Application Study Report' presents the proposed installation methodology and plans.

Discussions with the Environment Agency

DONG Energy has been in discussions with the Environment Agency regarding the scope and scale of the proposed sea defence works and the proposals as presented. The proposed works have been discussed and agreed in principle subject to a number of clarifications and the provision of separate documents required as part of the Environment Agency's own consenting process.

The Environment Agency has set out its current position in respect to the proposed works in the attached letter addressed to DONG Energy, dated 1st February 2016.

DONG Energy intends to submit a formal application for Flood Defence Consent to the Environment Agency in the week commencing 15th February 2016. This process is separate to planning and both planning permission and Flood Defence Consent will need to be in place before any works to the sea defence can take place.

Post-construction monitoring of the sea defences

DONG Energy is currently in discussion with the Environment Agency with regard to post-construction monitoring provisions. The final agreed monitoring programme will be secured by the Environment Agency through conditions attached to a Flood Defence Consent. Although these matters are currently under discussions DONG Energy confirms the proposed monitoring programme will include regular topographical surveys of the defence to be carried out, in order to monitor any movement/settlement compared with baseline measurements that will be taken from locations away from the works site, along with readings that will be taken from an extensometer which will be located between the installed cables in order to monitor any vertical settlement within the reinstated defence.

Subject to final agreement with the Environment Agency DONG Energy is proposing to implement a ten-year monitoring programme which would be extended by agreement with the Environment Agency, if it were considered necessary.



Public Right of Way diversion

The proposed works will require the sea defence crest to be temporarily lowered, and during those periods it will be necessary to temporarily divert the Peter Scott Way. An application has been submitted to Lincolnshire County Council for a temporary diversion order. DONG Energy will ensure the District Council is informed on that matter as it progresses.

Inter-tidal/salt marsh cable burial plans

Permission was granted, subject to conditions controlling the detail of the final burial/installation methodology for the installation of cables through the inter-tidal/salt marsh area using either a plough, chain trencher or a wide tracked excavator burial system. Applications for the discharge of the relevant condition (condition 3 of both planning permissions H18-0102-13 13/00189/FM, as amended) have been submitted to the District Council and the Borough Council.

It is understood that the District Council has received representations from the Environment Agency and the Marine Management Organisation in response to the discharge of condition application and I confirm following our subsequent conversations that DONG Energy is working with those bodies to seek agreement on the submitted information.

To confirm, no change to the proposed inter-tidal/salt marsh installation methodology is sought through this separate planning application submission, which focuses solely on the revised sea defence works.

I trust the enclosed information is sufficient to allow the planning application to be validated. Should you require any further information please do not hesitate to contact me. Otherwise I look forward to hearing from you in due course.

Yours sincerely
For RPS

A handwritten signature in black ink, appearing to read 'S. Gamage'.

Simon Gamage
Associate

Encs: Planning Application Forms
Notice Form and Letters (Submitted Separately by Email)
Site and Location Plans
PRoW Diversion Plans (Draft)
Consents Application Study Report (Cable Installation Methodology)
Drawings/Plans Pack
Heritage Statement
Ecology Appraisal (**CONTAINS PROTECTED SPECIES INFORMATION**)
Flood Risk Assessment
Traffic Management Plan

cc: DONG Energy RB (UK) Limited



South Holland District Council