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Our Ref: OXF2216

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Date: 21st April 2015

Development Control Department
South Holland District Council
Council Offices
Priory Road
Spalding
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Dear Sirs

Non-material amendment to planning permission Ref. H18-0341-10 (Installation of 11km of underground electrical cables (and alterations and extensions to Walpole substation within Kings Lynn and West Norfolk) to link with offshore turbines (renewal of H18-0122-07) for the Race Bank Offshore wind farm to allow for installation of 220kV cables

Please find attached an application for a non-material amendment under Section 96 of the Town and Country Planning Act 1990, which seeks approval for the installation of 220kV cables as part of the approved Race Bank offshore wind farm project, rather than the previously approved 132kV cables.

The application is comprised of the completed application form and this covering letter, together with the following accompanying documentation:-

- Cable route plan Ref. 2216-0105-02

Background

The Council will be aware that planning permission exists for a cable route comprised of a total of ten underground cable for the Lincs, Race Bank and Docking Shoal offshore wind farms, made up of 2 x 132kV cables for Lincs,4 x 132kV cables for Race Bank and 4 x 132 kV cables for Docking Shoal. All cables were to be accommodated within the same 50m wide cable corridor. Planning permission was granted for the Race Bank onshore elements under reference H18-0122-07 and was subsequently renewed under planning permission H18-0341-10.

Since planning permission H18-0341-10 was granted, Lincs has been completed and is now operational and Race Bank has been the subject of a number of amendment planning applications ahead of the planned commencement of construction in Spring 2015. The offshore elements of the Docking Shoal project were refused consent on 12th July 2012 by the Department of Energy and Climate Change. That project is no longer under development.

The District Council will also be aware that the Race Bank project was purchased by DONG Energy RB (UK) Limited ('DONG Energy') in December 2013. DONG Energy is reviewing the project ahead of the planned commencement of construction, including detailed engineering design work. This work has identified the need for small amendments to

onshore cables, as approved under H18-0341-10, which are discussed in the following paragraphs.

The Proposal

DONG Energy has amended the Race Bank onshore cables specification, replacing the approved 4 x 132kV cables with 2 x 220kV cables. The cables will be solid aluminium, with a cross-sectional area of 1400mm (the Environmental Statement (ES) submitted as part of application Ref. H18-0122-07 indicated the cables would have cross-sectional areas of either 500mm or 800mm), and will be installed via an enclosed ducting system. The ducting method will give increased mechanical protection to the cables, once installed in the ground.

The cables will be installed using cable trailers and winches, with careful monitoring during pull-through, to ensure appropriate protection throughout the installation process.

The increased cross-sectional area of the cables will not give rise to any increase in the amount of material excavated overall and will not give rise to a requirement for additional HGV movements to transport the cables to site.

It should be noted that permission is only sought for an 'uplift' in cables' voltage in the area identified in red on the attached plan Ref. 2216-0105-02. Planning permission for 220kV cables has already been granted in the area immediately south of landfall, pursuant to Borough Council of King's Lynn and West Norfolk planning permission Ref. 13/00189/FM and South Holland District Council planning permission Ref. H18-0102-13, and also at the Race Bank substation site, pursuant to Borough Council of King's Lynn and West Norfolk planning permission Ref. 14/01059/FM.

Application (Ref. H18-0122-07) was accompanied by an ES, which assessed the environmental effects of the onshore components of all three wind farm projects, including the cable route corridor. We summarise the conclusions of the ES topics below, together with an update on these conclusions, based on the required amendment.

Cultural Heritage

Para 7.2.41 of the ES stated "*There is limited potential for archaeological remains within the areas affected by cable installation and substation construction and operation. It is anticipated that there will be no significant adverse effects on the historic environment resource as a result of the proposed works, for Lincs, Docking Shoal or Race Bank either alone or together*".

An archaeological field walking survey, combined with a geophysical survey, was required under Condition 3 of permission Ref. H18-0341-10. Both were undertaken and the subsequent reports on which were submitted to the District Council and approved by order dated 16th August 2013 (Ref. H18-0433-13 refers). The survey found very little potential for archaeological interest along the route at the depths that would be affected by the project.

The cable route remains within the previously surveyed area and, as such, the required amendments would not have any impact on any features of interest. Furthermore construction staff will be briefed on protocols for action in the event they did find anything which may be of archaeological interest during works.

Landscape and Visual assessment

Para 7.3.81 of the ES stated "*The nature of the onshore development, however, being fairly isolated and largely underground, means that the landscape and visual effects arising from*

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the pro- posed works, with the exception of those arising from the construction of new sub-stations at Walpole, would be largely temporary in nature".

The required amendments would not have any impact on this conclusion. Again, construction works will remain mostly isolated and once constructed all evidence of the cable route will be below ground.

Socioeconomics and Tourism

Para 7.4.22 of the ES stated "*The potential effects on local businesses, tourism, and recreational activities during the construction, operation and decommissioning of onshore circuits and substations are considered to be of either low or negligible significance*".

The required amendments would not have any impact on this conclusion.

Noise

Para 7.5.92 of the ES stated "*with the implementation of the detailed noise control techniques the noise levels from the construction operations associated with the onshore works for the Lincs, Docking Shoal and Race Bank wind farms could be effectively controlled to within acceptable levels*".

The required amendments would not have any impact on this conclusion. Measures to control construction noise are contained in an overarching Construction Management Plan, currently under consideration by the Council.

Ecology and Nature Conservation

Paras 7.6.85 and 7.6.92 of the ES stated "*The habitats that would be affected as a result of the proposed developments are not of significant value to nature conservation. No statutory or non-statutory designated sites would be affected by the development proposals. All the habitats that would be affected by the proposals are common and widespread, and are therefore of less than local importance... It is therefore concluded that the overall impact of the proposed cable installation and substation development on the ecology of the study area, taking account of mitigation measures proposed, would be not significant*".

The required amendments would not have any impact on this conclusion. The entire Race Bank cable route has been the subject of a recent Phase 1 ecological survey, and subsequent water vole, otter and badger surveys and also a bat roost assessment, which provided recommendations for mitigation during the cable installation process. These mitigation measures will be observed and undertaken as necessary, to ensure there is no adverse impact on ecology or nature conservation.

Transport and Traffic

Paras 7.7.91 and 7.7.92 of the ES stated "*The main potential effects of traffic and transport for the onshore works are likely to be restricted to certain periods of the construction programme when bulk materials such as fill and concrete are being delivered. The effects are predicted to be temporary and restricted to the peaks during the construction period... With the implementation of appropriate mitigation it is predicted that the residual impacts of traffic and transport will be of minor adverse to negligible significance*".

The ES considered the cumulative impacts of all three wind farm projects in the shared 50m wide cable corridor and the transport impacts related to the installation of a total of 10 cables across the three projects. To date two cables have been installed and are operational for the Lincs project. DONG Energy is now seeking to reduce the number of cables for the Race

Bank project from four to two, which will reduce the total number of cables in the 50m wide corridor to four overall from the original ten.

The reduction in cables in turn results in a reduction in the overall volume of material that will be excavated and will also reduce the number of vehicle movements required to transport the cable drums to the site. There will be additional movements required in order to transport ducting to the site, however, this would still leave total movements below that set out within the ES. As such, the required amendments would not have any impact on the traffic and transport conclusions.

Flood Risk and Coastal Defences

Para 7.8.44 of the ES stated "*The more significant impacts with all three projects are associated with the construction phase. These range from minor adverse to major adverse, and are associated with the passing of the cable underneath the flood defences and inland drains....The inclusion of appropriate and adequate mitigation in the development, including attaining all relevant consents, agreeing a construction and operational methodology, and developing a flood management strategy, will reduce the significance of these impacts to negligible*".

The required amendments to the cables' voltage will not have any impact on this conclusion. DONG is currently in the process of applying to the King's Lynn Internal Drainage Board for consent to Horizontal Directional Drill (HDD) relevant inland drains. This will ensure there is an agreed installation methodology, which does not present any risk of flooding to the surrounding area.

Hydrology, Hydrogeology, Geology and Soils

Para 7.9.34 of the ES stated "*The potential impacts from the construction and operational phases of the onshore components of the Lincs, Docking Shoal and Race Bank projects, and the significance of these to hydrology, hydrogeology, geology and soils, have been considered. The more significant impacts are associated with the construction phase, ranging from negligible and minor adverse to major adverse – associated with potential soil movement beneath flood defences with the passing of the cable ducts. There are not likely to be any operational impacts additional to those already identified at the construction phase, with the significance of these generally reduced to minor adverse. The inclusion of appropriate and adequate mitigation in the development, including attaining all relevant consents and agreeing a construction and operational methodology, would reduce impact significance to negligible*".

Following the required amendment the project would have no greater effect on soils, given the reduction in the number of cables would result in material needing to be excavated along the route. Otherwise, the required amendment would not have any impact on this conclusion.

Conclusion

The proposal to amend the approved Race Bank onshore cables arrangement, replacing the approved 4 x 132kV cables with 2 x 220kV cables would not have any impact on the conclusions set out in the 2007 ES.

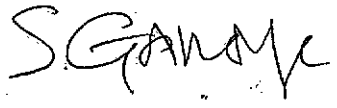
The proposal is therefore considered to be an acceptable non-material amendment to the extant planning permission.

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I trust you have sufficient information to register the application. If you would kindly acknowledge receipt, quoting the planning reference number, I will arrange for the £195 application fee to be paid without delay.

Please do not hesitate to contact me should you have queries regarding this application.

Yours sincerely
For RPS



Simon Gamage
Associate

cc: DONG Energy RB (UK) Ltd

Enc: Cable route plan Ref. 2216-0105-02