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**Sent:** 29 June 2015 15:46  
**To:** tritonknoll@rwe.com; Triton Knoll Electrical System  
**Cc:** Armstrong, Tig  
**Subject:** Proposed Triton Knoll, Electrical System - Section 56  
**Importance:** High

FAO Planning Inspectorate &  
Triton Knoll Offshore Wind

Thank you for consulting Norfolk County Council on the above proposal.

The officer-level comments below are made on a without prejudice basis.

Given all the works associated with the proposed development lie outside Norfolk (i.e. landfall; buried cable route; and grid-connection all lie within Lincolnshire), I can confirm that the County Council does not have any strategic concerns.

This response is consistent with the County Council's response made to the offshore Triton Knoll connection project made in November 2014 (Section 42) and to the offshore Wind Project made in May 2012 (see report attached - May 2012).

Should you have any queries please call or email me.

Regards

Stephen

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## Report to Planning and Transportation Cabinet Member

24 April 2012

Item No.

### **Triton Knoll Offshore Wind Farm Proposal Submission of Application by RWE Npower Renewables**

Report by the Director of Environment, Transport and Development

#### **Summary**

This is a Submission Consultation by RWE Npower Renewables for an Offshore Wind Farm approximately 46 KM (28.5 Miles) off the North Norfolk Coast. The proposal has the potential to generate 1,200 MW of electricity, which is sufficient to supply approximately 800,000 homes. The proposal comprises up to 288 turbines; covering 135 square kilometres; offshore collector/substation; and seabed cables linking the turbines and the offshore substation.

The export cable route and the onshore grid connection infrastructure will be the subject of a separate application/s. However, a "grid offer" has been made to the applicant by National Grid, which would involve connection to the electricity transmission network in Lincolnshire.

It is recommended that no objection be raised to the Triton Knoll Offshore Wind Farm providing:

- (a) The onshore grid-connection infrastructure is restricted to outside Norfolk;
- (b) Appropriate mitigation, and where necessary compensation, is given to those commercial fishing interests in Norfolk adversely impacted by the operation of the wind farm; and
- (c) Suitable navigation and shipping mitigation measures can be agreed with the appropriate regulatory bodies to ensure that Norfolk's Ports (King's Lynn and Wells) are not adversely affected by this proposal.

#### **1. Introduction**

- 1.1. This offshore wind farm proposal is a submission consultation under Section 56 of the 2008 Planning Act and is being taken forward through the Infrastructure Planning Commission (IPC) framework as it is a Nationally Strategic Infrastructure Project (NSIP). The IPC has recently been abolished (April 2012) under the Localism Act, with its functions now being handled by the Planning Inspectorate. The Planning Inspectorate will then make a

recommendation to the Secretary of State who will in turn make the final decision. The submission stage involves the applicant providing information on the proposed wind farm in the form of an Environmental Statement (ES). This is the last opportunity for consultees to comment before the proposal is formally examined.

## 2. **Background**

2.1. Members will be aware that the County Council responded to an earlier consultation (Section 42 pre-consultation) in July 2011, where the following recommendations were agreed:

“(1) RWE NPower Renewables LTD be informed that the County Council wishes to raise a holding objection to the proposed offshore Triton Knoll Wind Farm, in light of the lack of detailed information and proposals for the onshore grid connection (i.e. landfall, cable routes, transmission lines and sub-station);

(2) The applicant be asked to take a more “integrated” approach to handling all elements of this proposal in a single proposal including the submission of proposals for the onshore grid connection;

(3) The IPC be informed of the County Council’s concerns regarding the above proposal and ask that they agree with the applicant that a more integrated approach is needed which brings together both the onshore and offshore elements in a single proposal;

(4) The Applicant ensure that in the final submission Norfolk’s commercial fishing interests are thoroughly addressed as part of the decision making process; and appropriate mitigation, and where necessary compensation, is given to those commercial fishing interests adversely impacted by the operation of the wind farm.”

2.2. These issues are considered below in the Assessment Section.

## 3. **The Proposal**

3.1. This proposal comprises:

Location	:	The site is located 46 km (28.5 miles) off the North Norfolk Coast and occupying an area of 135 sq.km (see Map);
Number of turbines (Indicative)	:	Up to 288 three bladed turbines (4.2 MW Turbines);
Mean sea level to tip of blade at highest point	:	Up to 220 metres based on maximum size machine (8 MW);
Total Output	:	Installed Capacity of 1,200 Mega Watts (MW)

Other Offshore Works	:	Offshore convertor or substation platforms stations plus buried cables linking turbines and substation.
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### **Onshore Grid Connection**

- 3.2. The offshore substations will be connected to the land by one or more power export cables buried on the sea bed. From the landfall point the cables will be connected to an onshore substation that will transmit power to the National Grid network. It should be noted that the export cables and the onshore components do not form part of the above proposal. The grid connection agreement and the various supporting studies into feasibility options will be subject to separate consents.
- 3.3. Since the Section 42 Pre-Application consultation:
1. National Grid have made an offer for connection of the Triton Knoll Offshore Wind Farm to the existing electricity transmission network at a substation at Bicker Fen, South West of Boston in Lincolnshire; and
  2. The applicant has indentified an area of search for the onshore grid connection infrastructure within Lincolnshire. This assumes an underground cable route between the landfall site and the substation.

## **4. Policy Context**

### **a) National Policy**

- 4.1. The Energy Act 2008 states the government's targets for electricity generated from renewable sources. These currently stand at 10% by 2010 and 15% by 2015. The government has also signalled its intention to increase the targets to 20% in 2020. The UK's Renewable Energy Strategy was published in July 2009. The purpose of the Strategy is to set out the path for meeting the UK's legally-binding target to ensure 15% of the UK's energy comes from renewable energy sources by 2020.
- 4.2. The Department of Energy and Climate Change (DECC) has produced a National Policy Statement (NPS) for Energy (EN-1). This NPS takes into account the 2008 Planning Act and aims to "create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together". The NPS states that the Government envisage that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application to the IPC or in separate applications submitted in tandem which have been prepared in an integrated way.
- 4.3. The National Planning Policy Framework (March 2012) reiterates the Government's support for renewable energy (paragraphs 17 and 97).

### **b) Local Policy - A Climate Change Strategy for Norfolk**

- 4.4. The above strategy was commissioned by the Norfolk Local Government Association (LGA) and has been agreed by the County Council (2008). The strategy recognises the need for decisive action now to save energy and reduce emissions in order to avert the worst effects of climate change (e.g.

coastal erosion, flooding, water shortages, etc). With regard to renewable energy, priority is given to understanding the supply and demand in the renewables and low carbon-market.

## 5. **Local Member View**

- 5.1. Dr Strong has raised the need for appropriate mitigation towards commercial fishing, shipping and navigation arising from the offshore wind farm proposal.

## 6. **Assessment of Proposal**

### **(a) Benefits -**

- 6.1. The proposed development clearly has significant environmental benefits in terms of the amount of renewable energy it can provide (1,200 MW generating capacity), which is enough to supply 820,000 homes with electricity.

### **(b) Onshore Issues**

- 6.2. The main concern raised to this proposal previously (Section 42 consultation) in July 2011 was in relation to the grid connection issues and in particular the lack of any detailed information and proposals for the onshore elements (landfall, cable routes, transmission lines and substation). However, since the previous consultation the following has occurred:

1. National Grid have made a grid connection offer to the applicant at a substation in Lincolnshire (south west of Boston); and
2. The applicant has identified an area of search for the onshore grid connection (cable route) to the substation again within Lincolnshire.

On this basis it is reasonable to assume, providing the above onshore infrastructure elements take place in Lincolnshire, there will be no direct impact on Norfolk in terms of such infrastructure and no objection should be raised on this particular point.

### **(c) Visual Impact and Nature Conservation**

- 6.3. Given the location of the proposal, some 48 km (26 miles) off the North Norfolk coast, it is highly unlikely to have any demonstrable visual impact on the designated Norfolk Coastline. The EIA has concluded that because the wind farm is located so far off the shore, the turbines would only just be visible even under the best weather conditions and the visual impact would therefore be negligible. On this basis no objection on visual amenity/landscape grounds is considered necessary.
- 6.4. The offshore nature conservation issues potentially arising, such as impacts on bird life and marine ecology, are matters ultimately to be addressed by other consultees, such as Natural England, the Marine Management Organisation (MMO) and the Royal Society for the Protection of Birds (RSPB).

### **(d) Commercial Fishing**

- 6.5. The EIA has considered the impact on commercial fishing in the area. Fishing activity is largely confined to potting for crabs and lobsters and involves 7 - 8

vessels from Wells and other ports (Grimsby and Bridlington). The ES has taken a precautionary approach and has assumed that no potting will occur within the site once the wind farm is up and running. On this basis the applicant is proposing mitigation for those commercial fishing interests affected. Therefore providing suitable compensation can be achieved for those commercial fishing interests then no objection is recommended.

**(e) Shipping and Navigation –**

- 6.6. The ES acknowledges that the Humber region is one of the busiest shipping areas in the UK. The applicant has undertaken computer modelling and consultation with the ship owners, operators and port authorities. The assessment has shown there could be some impact on shipping once the wind farm is in place. The applicant is therefore proposing mitigation measures and is in discussion with the relevant authorities such as the Maritime and Coastguard Agency. Therefore providing that these mitigation measures can prevent impact on Norfolk's Ports (King's Lynn and Wells) and can be agreed with the appropriate regulatory bodies then it not considered appropriate to raise any objection.

**(f) Economic Considerations**

- 6.7. This proposal along with subsequent Round 3 offshore wind farm developments will potentially bring significant economic gains to the Region in terms of:
- (a) potential jobs supporting installing and servicing the turbines;
  - (b) potential manufacturing of turbines and the possibility of existing companies to win business (i.e. in the supply chain); and
  - (c) Increased port activity (e.g. during the construction phase and the servicing of the turbines).

The applicant has suggested that between 140 – 400 new full time jobs could be generated from this proposal, although the precise location of these jobs is uncertain.

- 6.8. **Highways** - There are no highway issues for Norfolk to the proposed offshore wind farm.

**7. Resource Implications**

- 7.1. There are no financial implications to the County Council arising from this proposal.

**8. Other Implications -**

- 8.1. **Legal Implication** - There are no legal implications.

- 8.2. **Human Rights** - None

- 8.3. **Equality Impact Assessment (EqIA)** - The County Council's planning functions are subject to equality impact assessments. However, as the County Council is simply a consultee on this offshore wind farm application, no EqIA

issues have been identified.

9. **Section 17 Crime and Disorder** – No implications.

10. **Alternative Option**

10.1. The alternative to not raising an objection to this proposal would be to raise an objection based on the potential impact of the proposed wind farm on Norfolk's commercial fishing interests; concerns about possible impacts arising from shipping and navigations and the effect on Norfolk's Ports. However, such an option is not recommended for the reasons set out in this report.

11. **Conclusion**

11.1. The above proposal for an offshore wind farm is located approximately 48 km off the north Norfolk Coast and is unlikely to have any significant visual impact. The applicant has undertaken an ES which has shown that providing there is suitable mitigation there will not be any significant impact in terms of shipping and navigation. In terms of the economic benefits arising from this proposal there could be up to 400 new jobs created. With regard to the onshore grid connection infrastructure this will be in Lincolnshire and as such there will be no impact in Norfolk.

Given the potential environmental benefits arising from this proposal in terms of the electricity generated, sufficient to supply 800,000 homes, it is felt that no objection should be raised to this application providing:

- All the onshore grid connection infrastructure is located outside Norfolk;
- Appropriate mitigation, and where necessary compensation, is given to those commercial fishing interests in Norfolk adversely impacted by the operation of the wind farm; and
- Suitable navigation and shipping mitigation measures can be agreed with the appropriate regulatory bodies to ensure that Norfolk's Ports are not adversely affected by this proposal.

## **Recommendation**

It is recommended that:

RWE Npower Renewables and the Planning Inspectorate be informed that Norfolk County Council does not wish to raise any objection to the above proposal providing:

1. There are no demonstrable impacts on Norfolk associated with the onshore grid connection infrastructure which is to be located outside Norfolk;
2. Appropriate mitigation, and where necessary compensation, is given to those commercial fishing interests in Norfolk adversely impacted by the operation of the wind farm; and
3. Suitable navigation and shipping mitigation measures can be agreed with the appropriate regulatory bodies, to ensure that Norfolk's Ports

(King's Lynn and Wells) are not adversely affected by this proposal.

## Background Papers

RWE Npower Renewables – Environmental Statement (March 2012).

## Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

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If you need this report in large print, audio, Braille, alternative format or in a different language please contact Stephen Faulkner on 01603 222752 or textphone 0844 8008011 and we will do our best to help.