



THE PLANNING ACT 2008  
THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)  
RULES 2010

Triton Knoll Electrical System

The construction and operation of Triton Knoll Electrical System to connect the Triton Knoll offshore windfarm turbine array to the National Grid sub-station at Bicker Fen, Lincolnshire.

Planning Inspectorate Reference: EN020019

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**NATURAL ENGLAND**  
**SUBMISSION FOR DEADLINE 7 ON THE REPORT ON THE**  
**IMPLICATIONS FOR EUROPEAN SITES (RIES) DOCUMENT**

Dated 24<sup>TH</sup> February 2016

Natural England has now reviewed the Report on Implications for European Sites (RIES) document prepared by the Examining Authority and provides the following comments.

### **Summary**

Natural England is in agreement with the conclusions made in the RIES document; however we provide the following comments on the detail contained in the RIES that supports the conclusions.

### **Detailed comments**

Comment number	Paragraph/page number	Natural England comment
1	Paragraph 2.6	Natural England believes that it was the Examining Authority that identified another 6 sites as Natural England had agreed as part of the Evidence Plan meetings that there were no pathways for impacts to interest features for these sites as set out in Natural England's written submission of the Issue Specific Hearing on 17 <sup>th</sup> November 2015, submitted for deadline 3.
2	Pages 6 Footnote 5	As discussed during the Issue Specific Hearings, Natural England has only determined no Likely Significant Effect for the Greater Wash SPA red throated diver feature if best practise mitigation is adopted in relation to vessel movements
3	Page 8	Natural England believes that there is a typo here as there is no Wash and North Norfolk Coast SPA
4	Table 2.3	It would be helpful if the table had a footnote that made reference to the Greater Wash SPA and Southern North Sea pSAC and the sections in the RIES document where they are discussed i.e. 3.19 – 3.23
5	Paragraph 3.2	Natural England agrees with there being no Likely Significant Effect to sandbanks features. However, Natural England would like to highlight that although sand waves may only cover a small area, they form part of the Annex 1 sandbank sediment system within the IDRBNR SCI and it is important that the movement of sediment in and around them is not

		interrupted. Therefore, our preference would be that sand waves are levelled sufficiently to ensure cables can be adequately buried and cable protection is only placed where it is absolutely essential i.e. at cable crossings. Sand waves should be levelled by moving the sand to the side to allow it to stay within the site, as opposed to it being removed. Something that the applicant has committed to do in several examination documents such as ' <i>Appendix 25: Clarification Note in response to Natural England Relevant Representation, principally covering offshore cable installation techniques</i> ' submitted by the Applicant for deadline 2.
6	Paragraph 3.3	Reference is made here to paragraph 1.13 of the Report to Inform Appropriate Assessment (RIAA) as evidence for Likely Significant Effect on the sandbanks feature being ruled out. However paragraph 1.13 of the RIAA refers to previous HRA undertaken for the Triton Knoll Array, not the current electrical system application and this is not clear in paragraph 3.3 of the RIES.
7	Paragraph 3.4	There should be no impacts to Annex I <i>Sabellaria spinulosa</i> reef during construction as mitigation measures to micro-route cable to avoid Annex I reef features have been agreed with the Applicant
8	Footnote 7, page 11	We advise that the RIES document should focus on impacts to Annex I reef during Operation & Maintenance (O&M) activities and decommissioning only
9	Paragraph 3.7	It should be made clear in this section that the reference is for O&M activities only and sign post to section 3.10
10	Paragraph 3.13	Natural England highlights again that best practise in relation to vessel movements should be adopted
11	Paragraph 3.16	Natural England suggest that the Southern North Sea pSAC and draft Greater Wash SPA are included as they are discussed in the document

12	Paragraph 3.29	Please note the site in question is stated in section 3.29
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