



# **Cambois Connection – Onshore Scheme Planning Statement**



# Cambois Connection: Onshore Scheme

Planning Statement

On behalf of **SSE Renewables**



Project Ref: 33313305702 | Rev: C | Date: October 2023

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Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU  
Office Address: Rotterdam House, 116 Quayside Newcastle Upon Tyne NE1 3DY  
T: 0191 261 5588 E: [newcastle.uk@stantec.com](mailto:newcastle.uk@stantec.com)

## Document Control Sheet

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	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>	
<b>Prepared by:</b>	MH	Senior Planner	<i>MH</i>	October 2023	
<b>Reviewed by:</b>	JH	Planning Director	<i>JH</i>	October 2023	
<b>Approved by:</b>	JH	Planning Director	<i>JH</i>	October 2023	
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## 1.0 Introduction

### Project Overview

- 1.1 Berwick Bank Wind Farm Limited ('BBWFL') is a wholly owned subsidiary of SSE Renewables ('SSER') (hereafter referred to as 'the Applicant'). The Applicant is pursuing the development of Offshore Export Cables, Onshore Export Cables, an Onshore Converter Station and associated grid connection to the existing Blyth National Grid substation near Cambois, Northumberland, known as the 'Cambois Connection' ('the 'Project').
- 1.2 The purpose of the Project is to facilitate the export of green energy from the Berwick Bank Wind Farm (BBWF) (being determined separately), located in the outer Firth of Forth, to the Blyth substation, Northumberland.
- 1.3 The Project comprises two proposals, or 'Schemes' which include:
- Marine Scheme: The Applicant is proposing the construction of High Voltage Direct Current (HVDC) offshore export cables from within the BBWF array area in the outer Firth of Forth (Scotland) to a proposed Landfall at Cambois, Northumberland (England) (also referred to as the 'Marine Scheme').
  - Onshore Scheme: The Applicant is proposing the construction and installation of a cable landfall, onshore High Voltage Direct Current (HVDC) export cables, a new onshore converter station and associated equipment, High Voltage Alternating Current (HVAC) grid cables (from the new onshore converter station to the existing Blyth National Grid substation near Cambois), including ancillary infrastructure and works to integrate the Onshore Scheme into the National Grid at the existing Blyth National Grid substation at Cambois.
- 1.4 The onshore components of the Project, landward of Mean Low Water Springs (MLWS) comprise the 'Onshore Scheme', which is the subject of this Planning Statement. The Onshore Scheme is proposed to be situated on land covering 188ha near Blyth and the villages of Cambois and East Sleekburn ('the Site'). The Site encompasses approximately 188 ha of land. However, the maximum footprint of the Onshore Scheme as described below will be considerably smaller than the 188 ha and will therefore not utilise the full extent of the Site. Furthermore, once installed, there will be limited permanent infrastructure that will be visible above ground.
- 1.5 Further information on the Site is detailed in Section 2 of this Planning Statement.
- 1.6 The Onshore Scheme comprises of the following elements which are visually represented at **Figure 1.1** overleaf:



- Landfall works;
- A new Onshore Converter Station;
- Onshore export cables within a cable corridor between the Landfall and the new Onshore Converter Station for a cable corridor length of up to 2.1 km;
- Onshore grid cables from the Onshore Converter Station to the National Grid Blyth substation for a cable corridor length of up to 1.5 km; and
- Associated ancillary infrastructure.

1.7 This Planning Statement has been prepared by Stantec in support of an Outline Planning Application submitted to Northumberland County Council ('NCC'), the Local Planning Authority (the 'LPA'). The Applicant has received written confirmation from the LPA that an Outline Planning Application is the appropriate consent method for the Onshore Scheme.

### **The Applicant**

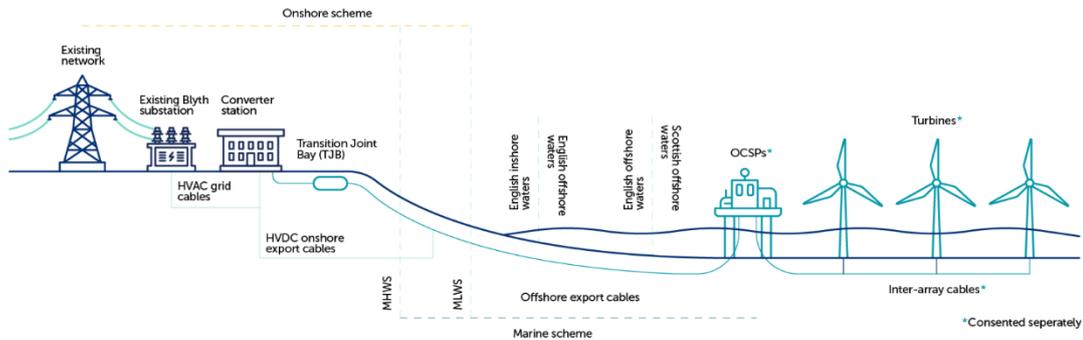
1.8 BBWFL is a wholly owned subsidiary of SSER. SSER is a leading developer and operator of renewable energy, headquartered in the UK and Ireland, with a growing presence internationally. Its strategy is to lead the transition to a net zero future through the world-class development, construction and operation of renewable power assets and it is building more offshore wind energy than any other company in the world. SSE Renewables is part of SSE plc, the UK-listed integrated energy group which is investing £18bn to 2027, or £10m a day, to deliver a Net Zero Acceleration Programme Plus to address climate change head on. This includes plans by SSE Renewables to increase its installed renewable energy capacity to 9GW by 2027. The company also plans to almost quadruple capacity to over 15GW by 2031, increasing output fivefold to over 50TWh annually – enough to be able to power around 20 million homes each year. SSE Renewables has a team of around 1,500 renewable energy professionals based across the UK, Ireland, Spain, France, Italy, Greece, the Netherlands, Japan and the USA, all committed to delivering the green energy the world needs now and in the future.

1.9 SSER is currently constructing one of the world's largest offshore wind energy projects, the 3.6 GW Dogger Bank Windfarms in the North Sea, which is a joint venture with Equinor and Eni, as well as Scotland's largest and the world's deepest fixed bottom offshore site, the 1.1 GW Seagreen Offshore Windfarm in the Firth of Forth, a joint venture with TotalEnergies. When complete, Dogger Bank and Seagreen Offshore Wind Farm will help power millions of UK homes and businesses and drive the transition to net zero carbon emissions. These assets will join the Applicant's existing operational offshore wind portfolio across two offshore joint venture sites, Beatrice and Greater Gabbard, both of which are operated on behalf of asset partners.



- 1.10 The Applicant is a highly experienced and trusted developer in terms of renewable energy particularly offshore wind and the associated onshore infrastructure required.

**Figure 1.1: Overview of key Project components**



*Please note that the Outline Planning Application which this Planning Statement supports only relates to the Onshore Scheme highlighted by the orange dashed box.*

**Environmental Impact Assessment**

- 1.11 The Applicant sought the views of the LPA on whether the Onshore Scheme constituted an Environmental Impact Assessment ('EIA') development and if an Environmental Statement was to be submitted what information should be submitted (see Section 3 of this Planning Statement for further information).
- 1.12 The LPA confirmed that the Onshore Scheme constituted 'EIA Development' in terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the 2017 Planning EIA Regulations') and as such confirmed that an Environmental Statement ('ES') was required.
- 1.13 An ES has been submitted as part of the planning application and should be read in conjunction with this Planning Statement.

**Purpose**

- 1.14 The purpose of this Planning Statement is to support the Outline Planning Application by explaining how the Onshore Scheme responds to the Site, its setting, and the relevant planning policies. This Planning Statement LPA sets out how the proposed development (the Onshore Scheme) is policy compliant and should be considered favourably in the planning balance.
- 1.15 For the avoidance of any doubt, this Planning Statement should be read alongside the extensive suite of supporting information submitted to support the Outline Planning Application.



Environmental and cumulative impacts are addressed in the supporting ES and the design evolution of the Onshore Scheme is addressed in the supporting Design and Access Statement.

### **Document Structure**

1.16 This Planning Statement is structured as follows:

- Section 2.0 provides a description of the Site and its surroundings;
- Section 3.0 outlines the planning history of the Site;
- Section 4.0 describes the Onshore Scheme;
- Section 5.0 highlights the relevant national and local policies and guidance applicable to the Site and the proposed development;
- Section 6.0 provides a planning assessment of the proposed development; and
- Section 7.0 concludes.



## 2.0 The Site and Surroundings

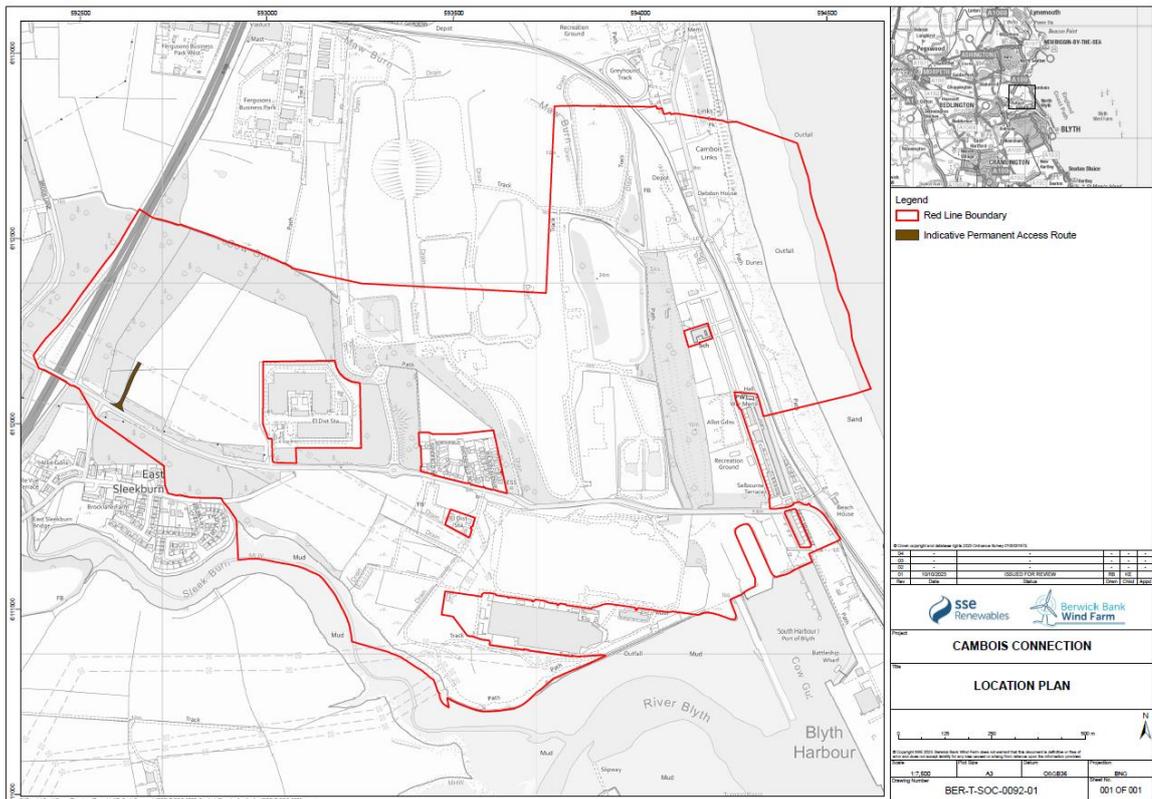
### Introduction

2.1 The following section summarises the Site and its context. For further details on the site selection process please refer to Volume 2, Chapter 4: Site Selection and Consideration of Alternatives of the ES.

### Site Location & Boundary

2.2 The Site is situated near Blyth and the villages of Cambois and East Sleekburn in Northumberland. The Site covers approximately 188ha and the Site boundary is shown in **Figure 2.1**.

**Figure 2.1: Site Boundary**



2.3 The boundary and extent of the Site have been the subject of discussions with the LPA. There are some design details related to the Onshore Scheme that are still to be finalised due to further ground investigations required, ongoing engineering design work and the procurement of cable and converter station suppliers. These details will inform the final specification. The Site boundary has been chosen to allow flexibility to accommodate these design details which will be subject to future application(s) for approval of Reserved Matters.



- 2.4 The Site comprises land to the north of Blyth and to the East of East Sleekburn and includes a mix of coastal amenity, new and legacy industrial uses, a school and residential areas. The Site includes three key areas:
1. The Landfall/HVDC Zone where the offshore export cables reach land);
  2. The Onshore Converter Station Zone; and
  3. The HVAC Zone where the grid cables from the converter station connect to the existing Blyth substation.
- 2.5 These Zones of Infrastructure are presented in ES Volume 4, Figure 5.1.
- 2.6 The proposed Landfall is located at Cambois North Beach. The Landfall location at Cambois forms the interface between the Marine Scheme and Onshore Scheme where the Offshore Export Cables will be brought ashore. The Landfall corridor is approximately 0.7 km wide at Cambois beach, at the widest point between the River Wansbeck and the Port of Blyth. The final location of the Landfall within the Landfall/HVDC Zone at Cambois is still to be determined.
- 2.7 Moving westwards (landwards) from the beach, Cambois Links are found at the back of the sand dunes, followed by railway tracks and a road. The road forms part of a small residential area, flanked by the Cambois Coastline to the east, and a larger brownfield construction area to the west. This area is the site of the former Blyth Power Station (closed in 2001), situated on the Northern bank of the river Blyth, between the tidal estuary and the North Sea. Planning permission was granted to BritishVolt in 2021 for the construction of a 'GigaFactory' electric vehicle battery factory upon the grounds of the former power station. Subsequently, BritishVolt went into administration and the company, along with land upon which the factory would be built, was sold to Recharge Industries. It has been stated by Recharge Industries that they intend to proceed with the plans for the new factory, although it is currently unknown whether an amended or reduced scheme will be proposed. From Cambois North Beach to the west side of the BritishVolt site describes the Landfall/HVDC Zone.
- 2.8 The Onshore Converter Station Zone is situated immediately to the west of the North Sea Link (NSL) converter station, with Brock Lane running east west along the southern boundary, the A189 forms the western boundary, and the Sleekburn Business Centre lies to the north. The Onshore Converter Station Zone comprises of predominantly greenfields and existing hedgerows.
- 2.9 The HVAC Zone extends from the south of the A189 to the River Blyth running east to west from the Onshore Converter Station Zone to the National Grid Blyth substation (. The HVAC Zone comprises of predominantly greenfields, existing hedgerows and a residential access road.



## Site Context

2.10 The site boundary accommodates design flexibility and as such contains several features including:

- Significant areas of hardstanding associated with previous built development.
- Main watercourses including the River Wansbeck, the River Blyth and the Sleek Burn.
- Existing trees.
- Existing hedgerows and habitats.
- Existing Public Rights of Way.
- Overhead pylons.
- Ground levels that vary across the Site due to the sloping topography (west to east) and due to deeply incised glacial outwash valleys.

2.11 The site appraisal exercise was comprehensive and complex due to the nature of the Onshore Scheme and individual elements (see Volume 2, Chapter 4 of the supporting ES). The pertinent site context details for the entire redline boundary (See Figure 2.1) can be summarised as follows:

- Lack of any landscape designations;
- Not located within the designated Green Belt;
- No ancient woodland present;
- Not located within a conservation area;
- Not located within the Northumbria Coast Ramsar;
- Lack of any designated heritage assets;
- The Site is considered at low risk (Flood Zone 1) of flooding in operation;
- Part of the Site overlaps with as the Sand Dune Priority Habitat<sup>1</sup>;
- Part of the Site falls within the Northumberland Shore SSSI;
- Two existing Public Rights of Way cross the Site, north to south (Reference: 600 059 and 600 054); and
- The National Cycle Network Route 1 and King Charles III England Coast Path along the eastern boundary of the Site.

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<sup>1</sup> However, the Onshore Scheme has been designed to accommodate trenchless techniques at landfall to avoid impacts on the dune system.



## 3.0 Planning History

- 3.1 The following Section summarises the pertinent planning history of the Site including the pre-application engagement with the LPA undertaken by the Applicant.
- 3.2 The pertinent planning history for the Site is listed in the Table 3-1 below.

**Table 3.1: Pertinent Planning History**

Reference	Description	Site	Status
13/01352/FUL	Redevelopment of existing disused warehouse building and surrounding land to accommodate an electricity substation with associated cabling	Land North of Blyth Power station Cambois Northumberland	Application Permitted: 10th October 2013
13/03524/OUTES	The construction and operation of the UK terrestrial elements of a high voltage direct current (HVDC) electrical interconnector between the UK and Norway comprising HVDC underground cables from a landfall at Cambois slipway to the proposed converter station site off Brock Lane; a converter station to convert electricity from HVDC to HVAC power and vice-versa; HVAC underground cables to Blyth substation	Land North East of East Sleekburn C415 Spine Road To East Sleekburn Bedlington Northumberland	Application Permitted: 7 <sup>th</sup> November 2014
14/02888/FUL	Change of use from agricultural land to nature reserve and excavation of a series of shallow scrapes and pools.	Land North East of Cambois Wembley Gardens Cambois Northumberland	Application Permitted: 12th December 2014
16/04722/LDO	The phased development of the East Sleekburn Enterprise Zone including the reclamation and remediation of the site to enable future redevelopment. The activities proposed include a site compound, material crushing and storage areas, ground remediation, construction of an ecological corridor on the northern boundary, reinstatement of surface water drainage and three outfalls including Cow Gut and a haul road aligned east to west along the northern boundary.	Former Blyth A And B Power Generation Stations Brock Lane East Sleekburn Northumberland NE22 7BF	Application Permitted: 1st February 2017
16/03929/FUL	Erection of 400kV electricity substation and welfare building, improvements to access roads, laying out of car parking, and means of enclosure.	Land West of Sub Station Cambois Northumberland	Application Permitted: 7 <sup>th</sup> February 2017
20/01835/SCOPE	Scoping opinion for a single wind turbine with a tip height of up to circa 300m and a rotor diameter of up to 200m	Land North of Sandfield Road Cambois Northumberland	Scoping Opinion Issued: 20th Sep 2020
21/00818/FULES	Erection of battery manufacturing plant with ancillary offices, together with associated development and infrastructure works (including site preparation works, ground modelling, drainage, landscaping, vehicular assess, cycle and pedestrian access,	Land at Former Power Station Site on Northern Side of Cambois Northumberland	Application Permitted: 20th July 2021



Reference	Description	Site	Status
	parking provision, substation and other associated works)		
21/02506/HAZARD	Hazardous Substance Consent for the storage and use of: Cathode Active Material (Cobalt Lithium Manganese Nickel Oxide) (Powder) and Electrolyte (no more than 20% Lithium Hexafluorophosphate) (Liquid) Quantities: 1830 tonnes of Cathode Active Material and 3162 tonnes of Electrolyte	Land East of Sleekburn Business Centre West Sleekburn Northumberland	Application Permitted: 22nd Sep 2022
21/03005/CCD	Construction of 2no. ponds at nature reserve site, deposition of arising soil materials at site	Land North East of Cambois Wembley Gardens Cambois Northumberland	Application Permitted: 7th December 2021
21/04089/FUL	Create access track to viewing area on a PFA mound at former stocking yard	Former Coal Stocking Yard, Cambois Northumberland	Application Permitted: 13th December 2021
21/03977/FUL	Erection of steel portal framed building complete with all associated cladding and building works to be used for manufacturing of luxury lodges (use class B2)	Land North of Charcon Brock Lane West Sleekburn Northumberland	Application Permitted: 22nd Feb 2022
21/04718/NONMAT	Non-material amendment (condition 1 plan) in order for storage locations to change on approved application 21/02506/HAZARD	Land East of Sleekburn Business Centre West Sleekburn Northumberland	Application Permitted: 22nd Feb 2022
22/00327/SCREEN	Screening Request in request of section 73 application to vary condition 2 (approved plans) on approved application 21/00818/FULES	Land at Former Power Station Site on Northern Side of Cambois Northumberland	Screening Opinion Issued: 16 <sup>th</sup> March 2022
22/00879/FUL	Erection of building for manufacturing of subsea cables, with ancillary offices and outdoor cable storage, together with associated development and infrastructure works including vehicular accesses off Brock Lane, landscaping and vehicular parking	Land North of Blyth Power Station Substation East Sleekburn Northumberland	Application Permitted: 8th June 2022
22/04138/NONMAT	Non-material amendment for: Addition of National Highways condition to approved application 21/00818/FULES	Land at Former Power Station Site on Northern Side of Cambois Northumberland	Application Permitted: 11 <sup>th</sup> November 2022
22/04118/SCOPE	EIA Scoping Opinion for the Cambois Connection Onshore Scheme	Land East of A189, East Sleekburn, Northumberland	Scoping Opinion Issued: 29 <sup>th</sup> December 2022

### Marine Scheme

3.3 The Applicant submitted an application under Part 4 of the Marine and Coastal Access Act 2009 for a Marine Licence to Construct and Operate Offshore Transmission Infrastructure in Scottish waters in July 2023. The application related to the construction, operation and maintenance of Offshore Export Cables and supporting activities beyond the 12 nautical miles limit, extending from



the BBWF array area to the Scottish/English border in the North Sea (the 'Marine Scheme in Scottish waters').

- 3.4 In addition, an application for the necessary Marine Licence under the Marine and Coastal Access Act 2009 to support the Marine Scheme in English waters was made to the Marine Management Organisation on the same day.
- 3.5 Together the two applications seek consent for the Marine Scheme which is directly related to the Onshore Scheme that this planning application supports. The ES supporting the Marine Scheme (Volume 3, Appendix 3.5) has considered the Marine Scheme, as well as the Onshore Scheme in two respects – (i) as part of the cumulative effects assessment (CEA); and (ii) in respect of the extent to which the Marine Scheme and Onshore Scheme redline boundaries both include the area between MLWS and MHWS, i.e., the intertidal area.
- 3.6 This approach is in accordance with the applicable legislation, the Marine Works (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 and Conservation of Habitats and Species Regulations 2017 (together the Habitats Regulations) and reflects the separate consenting processes for the Marine Scheme and Onshore Scheme application. This is outlined within the Applicant's Scoping Report (BBWFL, 2022) and throughout all pre-application consultation with stakeholders.
- 3.7 In particular, this approach allows each regulator under the Marine Scheme application and the Onshore Scheme application (i.e., the MMO and NCC, respectively) to determine the application submitted to them in accordance with their statutory role and functions and appropriate areas of competence under the EIA Regulations (and the 2017 Planning Regulations in the case of NCC and the Onshore Scheme) and the Habitats Regulations. The Applicant notes that NCC has agreed to the approach outlined by the Applicant as presented here.

### **EIA Scoping Process**

- 3.8 The Applicant entered into a formal Environmental Scoping exercise in November 2022. The purpose of scoping was to allow the Applicant to be clear on what the LPA considered the significant effects of the Onshore Scheme were likely to be and therefore, the topics on which the ES should focus. The site area submitted as part of the Environmental Scoping exercise measured c.700ha.
- 3.9 The LPA adopted a Scoping Opinion on the 29<sup>th</sup> December 2022 (NCC Reference: 22/04118/SCOPE) which outlined the topics to be addressed within the ES along with comments



on the methodology to be used for particular topics<sup>2</sup>. One of the key comments received related to the undefined project area and the need to narrow the Site boundary to better understand the future design and implications of the Onshore Scheme.

- 3.10 The EIA Scoping process played a key role in the evolution of the design. Following the formal Environmental Scoping exercise and further investigations the area of the Site was reduced substantially from c.700ha to approximately 188ha which narrowed the possible future design options.
- 3.11 Further information on the design evolution of the Onshore Scheme can be found in the supporting Design and Access Statement and ES.

### **Pre-Application**

- 3.12 The Applicant submitted a formal request for pre-application advice to the LPA in March 2023. The pre-application submission sought views on all aspects of the Onshore Scheme.
- 3.13 The pre-application response was received in May 2023 (NCC Reference: 23/00175/PREAPP). The response concluded that the principle of development in policy terms is supported by the policies in the Development Plan and material considerations, on the condition that any impacts are considered acceptable.
- 3.14 With regards to potential impacts, the pre-application response noted that there are a number of international, national and local environmental designations which are either within the red line boundary or within close proximity and any impact upon any of the environmentally designated areas will need to be carefully considered. Further information on ecology impacts can be found in the supporting ES and in particular within the ecological studies.
- 3.15 In short, the pre-application identified that the principle of development was supported subject to any impacts being considered acceptable, with the environmental designation areas either within the Site or in close proximity being of particular note.

### **Summary**

- 3.16 There is nothing within the Site's planning history which would prohibit delivery of the Onshore Scheme, if approved.

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<sup>2</sup> The Scoping Opinion also formally confirmed that the proposed development constituted 'EIA development'.



- 3.17 The Applicant has diligently undertaken a positive approach to pre-application engagement seeking the views of the LPA ahead of the formal planning submission, as encouraged in national planning policy and guidance. The pre-application engagement has identified support for the principle of the Onshore Scheme. In addition, the EIA Scoping has been very useful in highlighting the key areas on which the ES should focus.



## 4.0 The Onshore Scheme

4.1 The following Section summarises the Onshore Scheme and the individual elements. Further information can be found in Chapter 5 of the supporting ES.

### **Project Overview**

4.2 As highlighted in Section 1 of this Planning Statement, the Onshore Scheme comprises of the following elements (refer to Figure 1.1):

- Landfall works;
- a new Onshore Converter Station;
- onshore export cables within a cable corridor between the Landfall and the new Onshore Converter Station for a cable corridor length of up to 2.1 km;
- Onshore grid cables from the converter station to the National Grid Blyth substation for a cable corridor length of up to 1.5 km; and
- Associated ancillary infrastructure.

### **Design & Planning Approach**

4.3 The final design of the Onshore Scheme is not yet determined. There are certain design details that remain to be finalised following further design work with the benefit of information on ground conditions across the Site, ongoing engineering design work and the procurement of cable and converter station suppliers.

4.4 As some design details are yet to be finalised, the Applicant has adopted a Project Design Envelope ('PDE') approach to the Onshore Scheme in line with current best practice and principles. By following a PDE approach, a maximum design scenario can be defined for key components of the Onshore Scheme, such as the landfall, onshore cables, and converter station.

4.5 The Outline Planning Application which this Planning Statement supports seeks planning consent for the principle of the Onshore Scheme within the Site boundary (see Section 2 and Figure 2.2), based on the maximum design scenario. The Onshore Scheme will then be subject to an application(s) for the approval of Reserved Matters which will seek consent for the final scheme.

4.6 The approach to planning and design was agreed with NCC prior to the submission of the Outline Planning Application.



### The Onshore Scheme

4.7 A summary of the infrastructure required for the Onshore Scheme, is provided in Table 4.1 below. The summary reflects the PDE approach described above and presents the maximum design scenario at the Outline Planning Application stage.

**Table 4.1: The Infrastructure Required for the Onshore Scheme**

Infrastructure	Number	Maximum Design Parameters
<b>Landfall</b>		
Landfall trenchless technology ducts (e.g., Horizontal Directional Drill) (HDD)	Up to four	0.3 to up to 2.5 m diameter Up to 2.4 km duct length per cable (up to 9.6 km total)
Transition Joint Bays	Up to four	Up to 6 m width per TJB Up to 25 m length per TJB
Construction compounds (trenchless technology and TJBs)	Up to two	Up to 15,000 m <sup>2</sup>
<b>HVDC Cable Corridor</b>		
Onshore HVDC cables (Landfall to Onshore Converter Station)	Up to four	Up to 525 kV Up to 2.1 km in length per cable
Onshore HVDC cable trenches (including working corridor for installation) – open cut*	Up to four	2 m width per trench (Four trenches - one cable per trench) 12 m width trench (One trench - four cables per trench) Working corridor up to 110 m width Up to 2.2 m depth
Onshore HVDC cable corridor– trenchless technology ducts	Up to four	Working corridor up to 110 m Up to 15 m depth from ground level to top of duct
Joint Bays (HVDC cable route)	Up to 16	Up to 16 m total length Up to 6 m width
Onshore HVDC cable corridor construction compounds	Up to eight	Up to 37,800 m <sup>2</sup>
<b>Onshore Converter Station</b>		
Onshore Converter Station footprint	One station comprising multiple buildings within the overall envelope	Up to 290 m length by 275 m width. Maximum building height of 30 m + platform level (maximum total height 45.2 m AoD), not including any earthing finial or external electrical equipment.
Onshore Converter Station platform	One	Up to 300 m length by up to 300 m width; platform level up to 15.2 m AoD.



Infrastructure	Number	Maximum Design Parameters
Onshore Converter Station construction compounds	Two	Up to 20,400 m <sup>2</sup>
Outfall from the Onshore Converter Station site into Sleek Burn	One	Surface water will be discharged into the River Blyth, via an underground outfall to the Sleek Burn, in an arrangement similar to the NSL Converter Station. It is assumed flows will enter the Sleek Burn adjacent to the existing NSL outfall. Working corridor up to 10 m width.
Sustainable Urban Drainage (SuDS)/ Attenuation Ponds	Up to two	This will confirmed by detailed design.
<b>HVAC Cable Corridor</b>		
Onshore HVAC cables (Onshore Converter Station to Blyth substation)	Up to 12	Up to 400 kV Up to 1.7 km length per cable
Onshore HVAC cable trenches – Open Cut	Up to four	Up to 12m width per trench Up to 125 m width working corridor Up to 2.2 m depth
Onshore HVAC cable – trenchless technology ducts	Up to 12.	Working corridor up to 200 m Up to 15 m depth
Onshore HVAC construction compounds	Up to 8	Up to 32,980 m <sup>2</sup>
Joint Bays	Up to 24	Up to 16 m total length 6 m width
<b>Access roads and material storage</b>		
Permanent access road	One of two options: existing NSL access or new access from Brock Lane	Up to 8 m width This will confirmed by detailed design.
Temporary access roads	Two for HVDC route Three for HVAC route	Up to 12 m width Length to be confirmed by detailed design.
Material storage area (all areas)	Up to 15	Up to 65,980 m <sup>2</sup>

### **Blyth Substation**

4.8 The Onshore Scheme will connect to the existing National Grid substation at Blyth. For the avoidance of any doubt, an extension of the Blyth substation is being developed by National Grid, which was subject to a separate planning application, consented in March 2023. Therefore, the



extension to the existing National Grid substation at Blyth does not form part of this Outline Planning Application.



## 5.0 Planning Policy Context

5.1 The following section summarises the planning policy context relevant for the Onshore Scheme. In the interests of brevity, detailed information on the legislative context relevant the Onshore Scheme is not included here but can be found in Chapter 2: Legislative and Policy Context of the supporting ES. Additional information on the relevant planning policy context can also be found in Chapter 2.

### National Planning Policy

#### *The National Planning Policy Framework*

5.2 The National Planning Policy Framework ('NPPF') sets out the Government's planning policies for England and how these should be applied. The NPPF was published in 2012 and has been amended several times, most recently in September 2023.

5.3 The NPPF is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

5.4 The NPPF is a material consideration in the determination of planning applications. The Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: an economic objective, a social objective and an environmental objective.

5.5 The most pertinent paragraphs of the NPPF of relevance to the Onshore Scheme are outlined in Table 5.1 below.

**Table 5.1: Most Pertinent NPPF Paragraphs**

Paragraph No.	Paragraph
Paragraph 11c	<i>Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay;</i>
Paragraph 38	<i>Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of</i>



Paragraph No.	Paragraph
	<i>the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.</i>
Paragraph 47	<i>Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.</i>
Paragraph 81	<i>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation<sup>42</sup>, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.</i>
Paragraph 119	<i>Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.</i>
Paragraph 152	<i>The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</i>
Paragraph 155	<i>To help increase the use and supply of renewable and low carbon energy and heat, plans should:</i> <ul style="list-style-type: none"> <li><i>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);</i></li> <li><i>b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</i></li> <li><i>c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</i></li> </ul>
Paragraph 158	<i>When determining planning applications a for renewable and low carbon development, local planning authorities should:</i> <ul style="list-style-type: none"> <li><i>a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions;</i></li> </ul>



Paragraph No.	Paragraph
	<p><i>b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas, and</i></p> <p><i>c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable.</i></p>

## Local Planning Policy

### *The Adopted Development Plan*

5.6 The Development Plan comprises of the Northumberland Local Plan 2016 – 2036 (adopted 2022) ('the Local Plan') along with the associated policies map and the 20 made Neighbourhood Plans. There are no made Neighbourhood Plans that cover the Site boundary.

5.7 The most pertinent policies of the Local Plan of relevance to the Onshore Scheme are outlined and summarised in Table 5.2.

**Table 5.2: Most Pertinent Local Plan Policies**

Policy	Policy Requirement(s) Summary
Policy STP 1	<b>Spatial Strategy (Strategic Policy)</b> aims to deliver sustainable development which enhances the vitality of communities across Northumberland, supports economic growth and conserves and enhances the county's environmental assets.
Policy STP 2	<b>Presumption in favour of sustainable development (Strategic Policy)</b> outlines that the Council takes an approach to planning applications which reflects the presumption in favour of sustainable development contained in the NPPF.
Policy STP 3	<b>Principles of sustainable development (Strategic Policy)</b> outlines that development proposals in Northumberland will be considered as sustainable development, so long as they adhere to the outlined economic, social and environmental principles outlined in this policy.
Policy STP 4	<b>Climate change mitigation and adaptation (Strategic Policy)</b> makes clear that development proposals should mitigate climate change and contribute to meeting nationally binding targets to reduce greenhouse gas emissions; as well as support adaptation to climate change, be resilient to climate change and not make neighbouring areas more susceptible to the negative impacts of climate change.
Policy STP 5	<b>Health and wellbeing (Strategic Policy)</b> makes clear that development which promotes, supports and enhances the health and wellbeing of communities' residents, workers and visitors will be supported.



Policy	Policy Requirement(s) Summary
Policy STP 6	<b>Green infrastructure (Strategic Policy)</b> outlines that development proposals should, where relevant, seek to protect, improve, and extend Northumberland's green infrastructure and integrate within the network.
Policy ECN 1	<b>Planning strategy for the economy (Strategic Policy)</b> states the plan aims to deliver economic growth, while safeguarding the environment and community well-being, so helping to deliver the objectives of the Council's economic strategy.
Policy ECN 2	<p><b>Blyth Estuary Strategic Employment Area (Strategic Policy)</b> makes clear that land at the Blyth Estuary is allocated as a "Strategic Employment Area" within which the following sectors within the main employment industrial uses will be prioritised:</p> <ul style="list-style-type: none"> <li>• Low carbon and related environmental goods and services.</li> <li>• Offshore and sub-sea engineering;</li> <li>• Energy generation sectors with special emphasis on renewable and low carbon;</li> <li>• Development which will support and strengthen the economic role of the Port of Blyth.</li> </ul>
Policy ECN 5	<b>Large-scale windfall employment development (Strategic Policy)</b> outlines that development proposals for large-scale major business development for main employment uses, either as a standalone proposal or an extension of an existing business will be supported on land, which is not designated as employment land subject to robust demonstration that certain factors detailed within the policy are met.
Policy QOP 1	<b>Design principles (Strategic Policy)</b> sets out the design principles which should underpin the design of any new proposed development in Northumberland, which will ensure the development contributes positively to local character and distinctiveness and contribute to a positive relationship between built and natural features, including landform and topography.
Policy QOP 2	<b>Good design and amenity</b> seeks to ensure that new development has a positive impact on amenity and sets out the criteria for this to be achieved.
Policy TRA 1	<b>Promoting sustainable connections (Strategic Policy)</b> demonstrates how Transport Assessments, Transport Statements and Travel Plans can be used to address transport implications and promotes sustainable connections within applications.
Policy TRA 2	<b>The effects of development on the transport network</b> outlines the criteria which developments which are considered to impact the transport network are required to adhere to.
Policy ENV 1	<b>Approaches to assessing the impact of development on the natural, historic, and built environment (Strategic Policy)</b> details that NCC's approach to environmental issues including the natural, historic and built environments. The policy details how NCC will give appropriate weight to conserving and enhancing designated assets. The policy also details how an ecosystem approach will be taken to demonstrate an understanding of the significance and sensitivity of natural resources.
Policy ENV 2	<b>Biodiversity and geodiversity</b> focuses on the effects of development on biodiversity and geodiversity; addressing minimising adverse impacts, and maximising opportunities for biodiversity net gain. There is a specific focus within the policy upon addressing adverse effects on habitats and species.



Policy	Policy Requirement(s) Summary
Policy ENV 7	<b>Historic environment and heritage assets</b> states that development proposals will be assessed and decisions made that ensure the conservation and enhancement of the significance, quality and integrity of Northumberland’s heritage assets and their settings. Decisions that affect any heritage assets will be based on a sound understanding of the significance of the asset and the impact of any proposal upon that significance.
Policy WAT 1	<b>Water quality</b> makes clear that the Council aim for all water bodies to achieve ‘good status’ by 2021 in terms of their ecological balance and prevent any deterioration from that status.
Policy WAT 3	<b>Flooding</b> seeks to minimise surface water run off and the risk of flooding from potential development.
Policy WAT 5	<b>Coastal erosion and coastal change management</b> outlines NCC’s approach to areas vulnerable to coastal change. The policy details that vulnerable areas will be managed in accordance with the Shoreline Management Plan, while full weight will be given to the level of importance of the coast’s ecological and heritage value.
Policy MIN 4	<b>Safeguarding mineral resources (Strategic Policy)</b> outlines that applications for new development in the vicinity of an existing or permitted mineral extraction site must demonstrate that the new development will not prevent or prejudice the current or future use of the site.
Policy REN 1	<b>Renewable and low carbon energy and associated energy storage</b> sets out that renewable and low carbon energy proposals will be supported if applicants are able to demonstrate that its effects are acceptable or can be made acceptable. This includes criteria against which the acceptability of proposed developments will be assessed alongside other policies in the plan.

### Material Considerations

5.8 Planning law and the NPPF require that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise<sup>3</sup>. Material considerations are not defined and there is no set list. Instead, it is the responsibility of the decision maker to decide what weight should be given to material considerations in respect of an application for planning permission.

5.9 The material considerations considered relevant for the Onshore Scheme include the following:

- National Planning Policy Framework (addressed above);
- Adopted National Policy Statements;
- Draft National Policy Statements;
- National Planning Practice Guidance; and

<sup>3</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990,



- Northumberland Council Climate Emergency Declaration.

### ***Adopted National Policy Statements***

- 5.10 The National Policy Statements ('NPSs') (UK Government, 2011) outline the objectives for the development of Nationally Significant Infrastructure Projects ('NSIP's) within England and Wales. The NPSs form a key part of the wider national planning policy framework which is taken into consideration during the appraisal process of a planning application. NSIPs are defined in Part 3 of the Planning Act 2008.
- 5.11 The Onshore Scheme does not constitute an NSIP and as such does not require development consent under the Planning Act 2008, nor does it fall to the Planning Inspectorate to consider.
- 5.12 However, NPS' are statement of government intention relating, in this case to renewable energy projects. NPS' also undergo a democratic process of public consultation and parliamentary scrutiny before being designated. Therefore, constitute a material consideration in the determination of the Outline Planning Application which this Planning Statement supports.
- 5.13 The NPS' relevant to the Onshore Scheme are:
1. Overarching NPS for Energy (EN-1);
  2. Renewable Energy Infrastructure (EN-3); and
  3. Electricity Networks infrastructure (EN-5)
- 5.14 NPS EN-1 notes the need for the UK to continue to develop and secure electricity supplies is critical as the UK moves towards a low carbon economy. NPS EN-1 also sets out the relationship between NPS and marine licensing decisions undertaken by the Marine Management Organisation (MMO) during their assessment of licensable activities, as defined by Section 66 of the Marine and Coastal Access Act 2009 ('licensable marine activities').
- 5.15 NPS EN-3, in combination with NPS EN-1, provides the basis for consent decisions for renewable energy NSIPs. Crucially, NPS EN3 stresses that offshore wind farms and the renewable energy generated from them, are expected to make up a significant proportion of the UK's renewable energy generating capacity up to 2020 and towards 2050.
- 5.16 NPS EN-5 recognises that the new electricity generating infrastructure that the UK needs to move to a low carbon economy will be "*heavily dependent on the availability of a fit for purpose and robust electricity network*". EN-5 also highlights that "*when considering impacts for electricity networks infrastructure, all of the generic impacts covered in EN-1 are likely to be relevant, even*



*if they only apply during one phase of the development [...] or only apply to one part of the development”.*

### **Draft National Policy Statements**

- 5.17 A suite of draft revised Energy NPSs was published by the UK government in March 2023. The consultation ran from 30<sup>th</sup> March until 23<sup>rd</sup> June and the responses are now being considered before revised NPSs are formally designated.
- 5.18 The notable NPS revisions include the confirmation of a future energy mix which will come from a wide range of sources including renewables, as well as the discussion of UK security of supply and the role of the Capacity Market (draft revised EN-1) (DESNZ, 2023). Notably, the draft EN-1 also includes an update of need and urgency for new electricity infrastructure including networks, storage, and interconnection based on up-to-date analysis and understanding of known infrastructure and technologies.
- 5.19 Draft revised EN-3 (DESNZ, 2023) identifies offshore wind projects and associated transmission infrastructure as Critical National Priority infrastructure, receiving the highest form of policy support and a clear presumption of need.
- 5.20 Draft revised EN-5 (DESNZ, 2023) notes that as part of the transition to a more coordinated approach it is anticipated that some proposals for transmission may be consented separately to those for the windfarm array application (paragraph 2.12.8). The draft EN-5 goes on to cross-reference the BEIS-led Offshore Transmission Network Review.
- 5.21 There is currently no date for the next stage of the review process. However, the direction of travel is clear – national energy security and renewable energy production in particular offshore wind projects and associated transmission infrastructure are critical national priorities.

### **National Planning Practice Guidance**

- 5.22 In March 2014, the Government published its online Planning Practice Guidance (‘PPG’). This web-based resource was accompanied by a Written Ministerial Statement which included a list of the previous planning practice documents now cancelled. The PPG contains various guidance of relevance to the registration, processing and consideration of planning applications. The PPG is regularly updated by the Government.
- 5.23 The PPG of most relevance to the Onshore Scheme is the Renewable and Low Carbon Energy PPG which states that:



*“Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.”*

Paragraph: 001 Reference ID: 5-001-20140306

Revision date: 06 03 2014

### **Northumberland County Council Climate Emergency**

- 5.24 NCC have declared a climate emergency and have set a goal to half the Council’s carbon footprint by 2025 and make the County carbon neutral by 2030. In its declaration, the Council recognises that climate change is a significant, long-term challenge for the planet and are committed to taking action to reduce the impacts that climate change will have.
- 5.25 The Council have published its Climate Commitment Action Plan 2021 – 23 which details how NCC intends to reduce CO2 emissions produced in the County within this two year period.
- 5.26 The Climate Commitment Action Plan 2021 – 23 identifies seven priority actions areas, the most relevant of which is Priority Action Area 5 Renewable Energy Generation. Page 45 of the Action Plan notes that the Council is committed to installing its own renewables across the County and *“...supporting private investors to install renewable energy where; it is technically, socially and environmentally feasible.”*
- 5.27 The Climate Commitment Action Plan 2021 – 23 notes that the decarbonisation of the National Grid is not happening quickly enough for the 2030 target to be met and as such a ‘do nothing’ approach is not considered an option. Reference should be made to section 2.2 of Chapter 2 of the ES for further detail on both international and domestic climate change policy and commitments.

#### **Summary**

- 5.28 The national and local planning policy context is clear that the purpose of the planning system is to contribute to achieving sustainable development with the delivery of renewable energy projects, and associated infrastructure, considered key to meeting this purpose.
- 5.29 The relevant material considerations reinforce the national and local planning policy context with clear support for the delivery of renewable energy projects and associated infrastructure, particularly to achieve the local targets set by NCC as part of their climate emergency declaration.



## 6.0 Planning Assessment

6.1 As noted above, planning law and the NPPF require that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise. As set out above, the Development Plan in this instance comprises the Northumberland Local Plan 2016 – 2036 (adopted 2022).

6.2 The following section of this Planning Statement presents the assessment of the proposed development (the Onshore Scheme) against the Development Plan and relevant material considerations. The planning assessment is presented as follows:

- The Need Case
- Principle of Development;
- Planning Policy Assessment;
- Design, Layout and Scale;
- Technical Assessment;
  - Highways and Transport;
  - Ecology & Biodiversity Net Gain;
  - Flood Risk & Drainage;
  - Landscape;
  - Noise; and
  - Heritage.
- Planning Balance.

### **The Need Case**

6.3 The need case for the Onshore Scheme is demonstrated in four key areas:

- (i) Net Zero and the importance of deploying zero-carbon generation assets at scale;
- (ii) Security of supply (geographically and technologically diverse supplies);
- (iii) Affordability; and



(iv) The 'Do Nothing' Scenario

- 6.4 Firstly, decarbonisation to Net Zero is a legal requirement for the UK and is of global significance, Reference should be made to Chapter 2 of the supporting ES for further details. Decarbonisation cannot be allowed to fail, and urgent actions are required in the UK, and abroad, to keep the process on track to limit global warming.
- 6.5 Wind generation is an essential element of the delivery plan for the urgent decarbonisation of electricity generation in the UK. This is important not only to reduce power-related emissions, but also to provide a timely next-step contribution to a future generation portfolio which is capable of supporting the massive increase in electricity demand which is expected because of decarbonisation-through-electrification of transport and heat.
- 6.6 The Project, of which the Onshore Scheme forms part, will make a significant contribution to the decarbonisation efforts of the UK with an estimated generating capacity of 4.1 gigawatts (GW), contributing 37% of the UK's target of 11 GW of installed offshore wind capacity by 2030. The Onshore Scheme is a necessary aspect of the Project to enable the renewable energy produced to be realised.
- 6.7 Secondly, the Project will form a key part of the UK's generation mix. As part of a diverse generation mix, wind generation contributes to improving the stability of capacity utilisations among renewable generators. By being connected at the transmission system level, large-scale offshore wind generation can and will play an important role in the resilience of the UK's electricity system from an adequacy and system operation perspective.
- 6.8 Connection to the transmission system is of significant importance, enabling an unencumbered and efficient transfer of bulk power across the country, in order to supply electricity whenever and wherever it is needed. BBWF's two separate points of connection are also beneficial from both system reinforcement and system operability cost perspectives. The Onshore Scheme will provide one of the points of connection and a necessary aspect of the Project to realise the security of the UK's electricity supply.
- 6.9 Thirdly, the Project will make a substantial contribution to the affordability of the UK's energy supply. Offshore wind power reduces the market price of electricity by displacing more expensive forms of generation from the cost stack. This delivers measurable benefits for electricity consumers.
- 6.10 For the UK in particular, offshore wind power generation is economically attractive against many other forms of conventional and renewable energy generation due to the physical characteristics of the UK. Due to technological advances, the costs of offshore wind power are now close to grid parity in the UK.



- 6.11 In addition, the design and delivery of the Project contributes to the wider knowledge of the sector thereby enabling more rapid and deeper cost reductions than would otherwise be the case.
- 6.12 Notwithstanding the above, size remains an important consideration and maximising the generating capacity of projects improves their economic efficiency. The Onshore Scheme is a necessary aspect of maximising the generation potential of the Project and therefore economic efficiency.
- 6.13 Fourthly, if a 'do nothing' scenario is considered where the Onshore Scheme is not delivered then any contribution which the Project would make towards tackling the global climate change emergency and towards UK targets of becoming Net Zero in all greenhouse gas emissions by 2050, and by 2045 for Scotland, would not be realised.
- 6.14 As a further consequence, a tangible improvement to the efficiency of UK energy generation and transmission would not be delivered, leading (indirectly) to potential additional management challenges on the UK electricity grid (such as increased constraints and associated payments). It is clear that the 'do nothing' scenario is not an option if the UK is to meet its legally binding targets.
- 6.15 In short, there is overwhelming need for the Onshore Scheme, which is a material consideration in the determination of the Outline Planning Application. Having demonstrated the need for the Onshore Scheme, it is necessary to demonstrate how it is policy compliant and capable of being delivered.

### **Principle of Development**

- 6.16 Policy STP 1 sets the spatial strategy for Northumberland and directs development towards established settlements. Outside of these settlements, development is required to meet at least one of the specified exceptions. The Site is situated outside one of the established settlements and considered in planning terms to constitute 'the open countryside'.
- 6.17 The most relevant policy exception to the Onshore Scheme is part g (vi) which states that development in the open countryside will be supported if it can be demonstrated that it provides for essential transport, utilities and energy infrastructure in accordance with other policies in the Local Plan. 'Essential' is a high policy test that requires clear and demonstrable evidence.
- 6.18 Climate change poses a severe threat that demands urgent attention. Coupled with that is the drive towards Net Zero which is legally binding and requires the UK to decarbonise all aspects of daily life including electricity generation. At a local scale, NCC acknowledge the urgency of the issue and declared a climate emergency and have set a goal to half the Council's carbon footprint by 2025 and make the County carbon neutral by 2030.



- 6.19 As highlighted in Section 1 and the need case above, the Onshore Scheme is a necessary aspect of the Project to enable the export of green energy from the BBWF (being determined separately), located in the outer Firth of Forth, to the Blyth substation, Northumberland.
- 6.20 The Onshore Scheme should be considered as essential infrastructure, as per the requirements of Policy STP 1, because it is necessary to enable the realisation of renewable energy from BBWF which will provide an estimated generating capacity of 4.1 gigawatts (GW). The renewable energy generated from BBWF, part of it via the Onshore Scheme would make a substantial contribution to both the UK's and Northumberland County's decarbonisation efforts and contribute 37% of the UK's target of 11 GW of installed offshore wind capacity by 2030. Therefore, the Onshore Scheme clearly provides essential energy infrastructure in accordance with part g(vi) of Policy STP 1.
- 6.21 Turning to the other relevant policies in the Local Plan, as required by Policy STP 1. Policy STP 2 specifies a presumption in favour of sustainable development, reflecting the approach in the NPPF. More specifically, Policy STP 2 outlines how NCC will work proactively with applicants to seek to find solutions that mean proposals that improve the economic, social and environmental conditions in the area can be approved wherever possible.
- 6.22 The Onshore Scheme is inherently sustainable by providing the infrastructure necessary to facilitate the delivery of much needed renewable energy generated by the BBWF and thereby by definition improving the economic, social and environmental conditions in the area.
- 6.23 With regards to economic conditions more specifically, the Applicant has committed to preparing a Supply Chain Engagement Plan (see Chapter 16 of the supporting ES) which will set out initiatives to enhance opportunities for procurement from local suppliers and to drive the investment in new facilities associated with the development, manufacturing and supply, and construction / installation supply chain. The commitment to this local first approach seeks to act on the opportunity presented by a more reliable pipeline of offshore wind sector activity and tackle the historic lack of investment in supply chain capacity.
- 6.24 The Supply Chain Engagement Plan is in addition to the macro economic benefits of the Project (including the Onshore Scheme), as detailed in the needs case above, related to improving the affordability of electricity and expanding the industry knowledge.
- 6.25 In terms of social conditions, the Applicant has committed to engaging with the host community throughout the project lifecycle, from conception, through consultation, into construction, operation and leaving a lasting legacy. To support this, the Applicant has appointed a dedicated Stakeholder Engagement Manager to act as a single point of contact for the community, working to identify local stakeholders and implement a robust and individually tailored engagement strategy to ensure positive social value is delivered as part of the development. In particular, building relationships



with local schools and colleges to engage young people, educating them about energy sources and new technologies as well as the potential skills and future employment opportunities in the renewable energy sector.

6.26 Improving environmental conditions is the primary purpose of the Onshore Scheme by facilitating significant renewable energy production, thereby making a substantial contribution to the decarbonisation of the area and as such the environmental conditions. The Onshore Scheme also delivers a biodiversity net gain resulting in an environmental enhancement of the area.

6.27 As such, the Onshore Scheme improves the social, economic, and environmental conditions of the area and therefore accords with the objectives of sustainable development as defined in the NPPF, and Policy STP 2.

6.28 Policy STP 3 outlines the principles of sustainable development, not all of which apply to every proposal. The relevant policy requirements and how the Onshore Scheme meets each one is summarised below:

*a. Contribute to building a strong, responsive and competitive economy across Northumberland, support more and better jobs, protect and enhance the vitality and viability of Northumberland's town centres and other important economic sectors;*

6.29 As noted above, the Applicant has committed to preparing a Supply Chain Engagement Plan (see Chapter 16 of the supporting ES) which will set out initiatives to enhance opportunities for procurement from local suppliers and to drive the investment in new facilities associated with the development, manufacturing and supply, and construction / installation supply chain. The commitment to a local first approach will contribute to building a strong, responsive and competitive economy across Northumberland.

*d. Contribute to the conservation and enhancement of Northumberland's natural, historic, water and built environment assets, and contribute to increasing the natural capital resource;*

6.30 The Onshore Scheme delivers a biodiversity net gain resulting in a greater diversity of species and habitats across Northumberland, thereby contributing to the enhancement of Northumberland's natural environment. The biodiversity net gain is in addition to the macro environmental benefits of facilitating renewable energy generation and the drive to Net Zero.

*e. Minimise their impact upon local amenity for new or existing residents and businesses, adjoining premises and land uses;*



6.31 The Applicant has made a conscious effort to thoroughly identify possible impacts upon local amenity and appropriate mitigation measures, where required. The Applicant undertook voluntary community engagement prior to the submission of this planning application (see Chapter 6, Appendix 6.1 and Appendix 6.2 of the supporting ES) which provided the opportunity for local residents to raise any concerns, including any amenity related concerns. The Applicant also undertook formal engagement with NCC prior to the submission of this planning application which provided the opportunity for consultees such as NCC Environmental Health to raise any possible concerns, as detailed in Section 3 of this Planning Statement.

6.32 The design of the Onshore Scheme considered the comments raised as part of this pre-submission engagement (see the Design and Access Statement for further information on the design evolution). As a result, the Applicant has committed to a series of measures to minimise impacts on local amenity during construction and operation (see Chapter 16 of the supporting ES). Most notably, the Applicant has committed to the production and approval of a Construction Environmental Management Plan, an Outline CEMP has been submitted as part of this application (Volume 3, Appendix 5.2), and Code of Construction Plan which together set out the commitments that will be adhered to during construction to minimise and/or manage potential environmental impacts such as noise, dust and water pollution.

6.33 In short, the possible impacts on amenity have been identified and appropriately mitigated.

*f. Contribute to net gains for biodiversity and establish a coherent and resilient ecological network;*

6.34 The Onshore Scheme will deliver a biodiversity net gain (see ES Volume 3 Appendix 9.8) thereby positively responding to Policy STP 3(f).

*n. Be located in areas which are least vulnerable to climatic impacts such as risk from all sources of flooding and rising sea levels; and*

6.35 The Onshore Scheme has been carefully designed and situated on a Site that is considered at low risk of flooding (Flood Zone 1), in operation and appropriate drainage arrangements have been proposed. The flood risk assessment and supporting ES demonstrate that the possible effects of climate change have been considered and tested. For example, the flood risk assessment included a 40% allowance for climate change.

6.36 In short, the Onshore Scheme is located in an area least vulnerable to climatic impacts.

*o. Anticipated impacts, including those from climate change, on the historic and natural environment, including landscape, biodiversity, ecosystems and water resources should be*



*avoided by locating development elsewhere, adequately mitigated, or as a last resort, adequately compensated for.*

- 6.37 The supporting ES identifies the likely impacts and their significant across a range of disciplines that together cover the historic and natural environment. Chapter 16 of the supporting ES details the designed in measures, mitigation and monitoring commitments of the Onshore Scheme which demonstrate the anticipated impacts of the development have been adequately avoided and/or mitigated.
- 6.38 Technical delivery considerations such as biodiversity net gain and the highway network are covered in greater below and in the supporting information which accompanies this Planning Statement, but in summary the above demonstrates how the Onshore Scheme full accords with all the relevant sustainable principles of Policy STP 3.
- 6.39 Policy STP 4 specifies how development should mitigate climate change and contribute to meeting nationally binding targets to reduce greenhouses gas emissions. As mentioned above, the Onshore Scheme is a necessary part of the Project, the purpose of which is to facilitate the export of green energy from the BBWF (being determined separately), located in the outer Firth of Forth, to the Blyth substation, Northumberland. The Project will generate an estimated 4.1 gigawatts of renewable energy, contributing 37% of the UK's target of 11 GW of installed offshore wind capacity by 2030.
- 6.40 The Project, and by virtue the Onshore Scheme, will make a substantial contribution to meeting nationally binding targets to reduce greenhouses gas emissions and as such is demonstrably in compliance with the requirements of Policy STP 4.
- 6.41 Policy REN 1 outlines support for proposals concerning renewable and low carbon energy development subject to a number of policy requirements. The two policy requirements applicable to the Onshore Scheme are Policy REN 1(3) and (4):

*3. Applications will be supported where it has been demonstrated that the environmental, social and economic effects of the proposal, individually and cumulatively, are acceptable or can be made acceptable.*

*4. Applications will not be supported unless an assessment of cumulative impacts has been undertaken, and taking account of any mitigation measures, the impacts are found to be acceptable.*

- 6.42 As demonstrated above, the Onshore Scheme improves the social, economic, and environmental conditions of the area and therefore accords with the objectives of sustainable development. By



virtue, the environmental, social and economic effects of the Onshore Scheme are considered acceptable and as such in compliance with Policy REN 1(3).

- 6.43 In addition, the Onshore Scheme is supported by an ES which provides an assessment of cumulative impacts. Furthermore, the cumulative sites that the ES tested was agreed with NCC prior to the environmental assessments being undertaken.
- 6.44 The relevant policy requirements of Policy REN 1 have been met and as such the Onshore Scheme is supported.
- 6.45 Policy ECN 1 seeks to deliver economic growth as per the objectives of the Council's economic strategy. Policy ECN 1 (part 2a) aims to deliver sufficient employment land and premises of the necessary range and quality and in sustainable locations compatible with the spatial strategy to meet requirements. Part 2 offers explicit support for the further development of the County's key infrastructure.
- 6.46 Similarly, to Policy STP 1 detailed above, Onshore Scheme should be considered as key infrastructure, as per the requirements of Policy STP 1, because it is necessary to enable the realisation of renewable energy from BBWF which will provide an estimated generating capacity of 4.1 gigawatts (GW). The renewable energy generated from the Project would make a substantial contribution to both the UK's and Northumberland County's decarbonisation efforts and contribute 37% of the UK's target of 11 GW of installed offshore wind capacity by 2030. Therefore, the Onshore Scheme clearly provides essential energy infrastructure in accordance with Policy ECN 1 (part 2).
- 6.47 Policy ECN2 allocates the Blyth Estuary Area, which includes the Site, as a strategic employment area and specifies the sectors that will be prioritised. Policy ECN2 (1c) notes that energy generation sectors with special emphasis on renewable and low carbon is one of the sectors that will be prioritised. The Onshore Scheme is considered part of the energy generation sector and as detailed above will have a significant impact on the development of the industry as a whole. Therefore, Policy ECN2 (part 1c) seeks to prioritise the Onshore Scheme in this area. In short, Policies ECN 1 and ECN 2 therefore provide strong support for the proposal in principle.
- 6.48 The principle of development is established by part g (vi) of Policy STP 1 subject to compliance with the other policies in the Local Plan. This Planning Statement and the supporting information demonstrates that the Onshore Scheme is compliant with the other policies in the Local Plan, notably Policy STP 2, Policy STP 3, Policy STP 4, Policy REN 1, Policy ECN 1 and Policy ECN 2.
- 6.49 The principle of development is further supported by compliance with the objective of national planning policy and NCC's climate emergency declaration. In summary, the principle of development has been established.



### Design, Layout and Scale

- 6.50 The design, layout and scale of the Onshore Scheme has been subject to pre-application discussions with key stakeholders and the LPA (see Section 3 of the Planning Statement). Further information on the design evolution of the Onshore Scheme can be found in the supporting Design and Access Statement and Chapter 4 of the supporting ES.
- 6.51 The Onshore Scheme is based on a PDE approach (as described in Section 4 of this Planning Statement) and as such is based on the maximum design scenario at this stage. The supporting technical assessments and ES have tested this PDE approach which represents a 'worst case' scenario and adopts a precautionary approach.
- 6.52 The two pertinent design related policies are QOP 1 Design Principles (Strategic Policy) and QOP 2 Good Design and Amenity. The Onshore Scheme, and PDE approach, have been designed considering the technical requirements as well as the relevant QOP 1 and QOP 2 policy requirements.
- 6.53 As the planning application is in outline, only limited design details are available at this stage. The Onshore Scheme will be subject to a Reserved Matters Application(s) which will seek consent for the final scheme thereby refining the design details. Further detail on how the Onshore Scheme complies with all of the relevant QOP 1 and QOP 2 policy requirements will be provided at the detailed planning stage.
- 6.54 Notwithstanding this, there are a number of the relevant QOP 1 and QOP 2 policy requirements that the Onshore Scheme meets now and are detailed below.
- 6.55 The relevant policy requirements of Policy QOP 1 are:
- c. Be visually attractive and incorporate high quality materials and detailing;*
- 6.56 The majority of the Onshore Scheme is underground and therefore once complete, the underground elements will have no visual impact. Further information on the visual appearance and materials of the Onshore Converter Station, the main visual aspect of the Onshore Scheme, will be provided within the application(s) for approval of Reserved Matters.
- d. Respect and enhance the natural, developed and historic environment, including heritage, environmental and ecological assets, and any significant views or landscape setting*
- 6.57 The supporting ES identifies the likely impacts and their significant across a range of disciplines that together cover the historic and natural environment. Chapter 16 of the supporting ES details



the designed in measures, mitigation and monitoring commitments of the Onshore Scheme which demonstrate the anticipated impacts of the proposed development have been adequately avoided and/or mitigated as a minimum. Where possible opportunities have been identified to further enhance the local environment such as with the delivery of biodiversity net gain.

6.58 In short, the supporting ES demonstrates a comprehensive understanding of the Onshore Scheme and respect for the local environment. The anticipated impacts of the Onshore Scheme have been adequately avoided and/or mitigated as a minimum and where possible opportunities to enhance the local environment have been incorporated into the design.

*e. Ensure that buildings and spaces are functional and adaptable for future uses;*

6.59 The Onshore Converter Station is the only building(s) of note as part of the Onshore Scheme and the Applicant has committed to a 35-year lifespan of the building (see Section 6 of the supporting Design and Access Statement). The layout and adaptability of the Onshore Converter Station will be confirmed at the detailed planning stage. However, the Site is of sufficient scale to ensure that the Onshore Converter Station can be functional and adaptable.

*h. Support positive social interaction and a safe and secure environment, including measures where relevant to reduce the risk of crime and the fear of crime;*

6.60 The Applicant has committed to preparing a Construction Environmental Management Plan ('CEMP') which will set a series of measures and practices to be adhered to throughout construction, an Outline CEMP has been submitted as part of this application (Volume 3, Appendix 5.2). The CEMP will include measures that relate to the preparation and operation of the Site to create a secure environment such as the appropriate storage of materials to deter the risk of crime.

6.61 The layout and boundary treatment for the Onshore Converter Station will be confirmed within the application(s) for approval of Reserved Matters but the Site is of sufficient scale to accommodate measures to reduce the risk and fear of crime.

*i. Not cause unacceptable harm to the amenity of existing and future occupiers of the site and its surroundings;*

6.62 The CEMP noted above, will also include measures related to key potential nuisances such as traffic management and dust to mitigate against harm to the amenity of existing and future occupiers and residents.

*j. Incorporate, where possible, green infrastructure and opportunities to support wildlife, while minimising impact on biodiversity and contributing to environmental net gains;*



- 6.63 The Applicant has committed to avoidance of the intertidal area at Cambois beach through the use of trenchless techniques at the Landfall, avoidance of sensitive habitats such as the Northumberland Shore SSSI, priority woodland habitat west of the Onshore Converter Station Zone and saltmarsh habitats along the Sleek Burn to ensure impacts on wildlife and key habitats are minimised..
- 6.64 The Applicant has also committed to a series of 'designed in measures' (see Chapter 16 of the supporting ES) as part of the maximum design scenario. With regards to trees, green and blue infrastructure specifically, there are designed in measures which specify priority woodland habitat and other areas of woodland within the Site which will be avoided (see **Figure 6.1 overleaf**), commitments to the construction of a swale for drainage which will maximise the use of native plants and ecological connectivity and commitments to avoiding mixing topsoil with subsoil.
- 6.65 The Onshore Scheme also includes a biodiversity net gain which will increase the diversity of habitats and contribute to wider environmental net gains. Therefore, the Onshore Scheme has sought to retain the key trees, green and blue infrastructure as well as integrate enhancements to the local environment.

*k. Make provision for efficient use of resources;*

- 6.66 The primary purpose of BBWF that the Onshore Scheme (as part of the Project) serves is to make efficient use of the UK's wind resources to provide substantial amounts of renewable energy. As a direct result of this, the Onshore Scheme has been carefully designed to make efficient use of resource so as to not compromise the purpose of BBWF.
- 6.67 Details on the final scheme including materials, development quantum and layout will be provided within the application(s) for approval of Reserved Matters which will further demonstrate the efficient use of resources in every aspect of the Onshore Scheme.

*l. Respond to the climatic conditions of the location and avoid the creation of adverse local climatic conditions;*

- 6.68 As noted above, the provision by BBWF of substantial amounts of renewable energy (via the Onshore Scheme) will make a substantial positive impact on mitigating climate change which in turn will contribute to creating better climatic conditions.
- 6.69 More locally, the Onshore Scheme has been carefully designed and situated on a Site that is considered at low risk of flooding (Flood Zone 1), in operation and appropriate drainage arrangements have been proposed. The FRA and supporting ES demonstrate that the possible effects of climate change have been considered and tested. For example, the flood risk



assessment included a 40% allowance for climate change. The FRA also demonstrates that the Onshore Scheme will not increase flood risk off Site.

6.70 In summary, BBWF's primary purpose is to improve climatic conditions but in any event is located in an area least vulnerable to climatic impacts and avoids creating adverse local climatic conditions.

*m. Mitigate climate change, and be adaptable to a changing climate;*

6.71 For the reasons noted above, BBWF will provide substantial amounts of renewable energy (via the Onshore Scheme) which will make a significant positive impact on mitigating climate change, therefore directly responding to this policy requirement.

6.72 The relevant policy requirements of Policy QOP 2 are:

*1. Development will be required to provide a high standard of amenity for existing and future users of the development itself and not cause unacceptable harm to the amenity of those living in, working in or visiting the local area.*

6.73 The Applicant has committed to a range of measure to avoid and mitigate any potential harm to local amenity as demonstrated above.

*2. Development proposals will need to ensure that the following criteria are met where applicable, taking into account any relevant cumulative effects and possible mitigation measures:*

*a. The physical presence and design of the development preserves the character of the area and does not have a visually obtrusive or overbearing impact on neighbouring uses, while outlook from habitable areas of the development is not oppressive and the best outcomes for outlook are achieved wherever possible;*

6.74 The majority of the Onshore Scheme is underground and therefore once complete, those elements will preserve the character of the area. In addition, it will not have an obtrusive or overbearing impact on neighbouring uses.

6.75 Further information on the visual appearance and materials of the Onshore Converter Station, the main visual aspect of the Onshore Scheme, will be provided within the application(s) for approval of Reserved Matters. But in any event, the Onshore Converter Station will be situated in an area which is highly industrialised and identified for this type of development (See Policy ECN 2) and as such is likely to enhance the character of the area rather than detract from it.



*b. Trees, other green and blue infrastructure and soft landscaping of amenity value are retained where appropriate and are introduced or replaced where they would enhance amenity of the development;*

6.76 As per Policy QOP 1(j), the Applicant has committed to avoidance of the intertidal area at Cambois beach through the use of trenchless techniques at the Landfall, avoidance of sensitive habitats such as the Northumberland Shore SSSI and priority woodland habitat west of the Onshore Converter Station Zone.

6.77 The Applicant has also committed to a series of 'designed in measures' (see Chapter 16 of the supporting ES) as part of the maximum design scenario. With regards to trees, green and blue infrastructure specifically, there are designed in measures which specify priority woodland habitat and other areas of woodland within the Site which will be avoided (see **Figure 6.1** overleaf), commitments to the construction of a swale for drainage which will maximise the use of native plants and ecological connectivity and commitments to avoiding mixing topsoil with subsoil.

6.78 The Onshore Scheme also includes a biodiversity net gain which will increase the diversity of habitats and contribute to wider environmental net gains. Therefore, the Onshore Scheme has sought to retain the key trees, green and blue infrastructure as well as integrate enhancements to the local environment.

*e. Neighbouring uses are compatible and that there are no unacceptable adverse impacts from noise, disturbances, odour, gases, other emissions and any other harmful effects, resulting from either the development or from neighbouring uses on the development.*

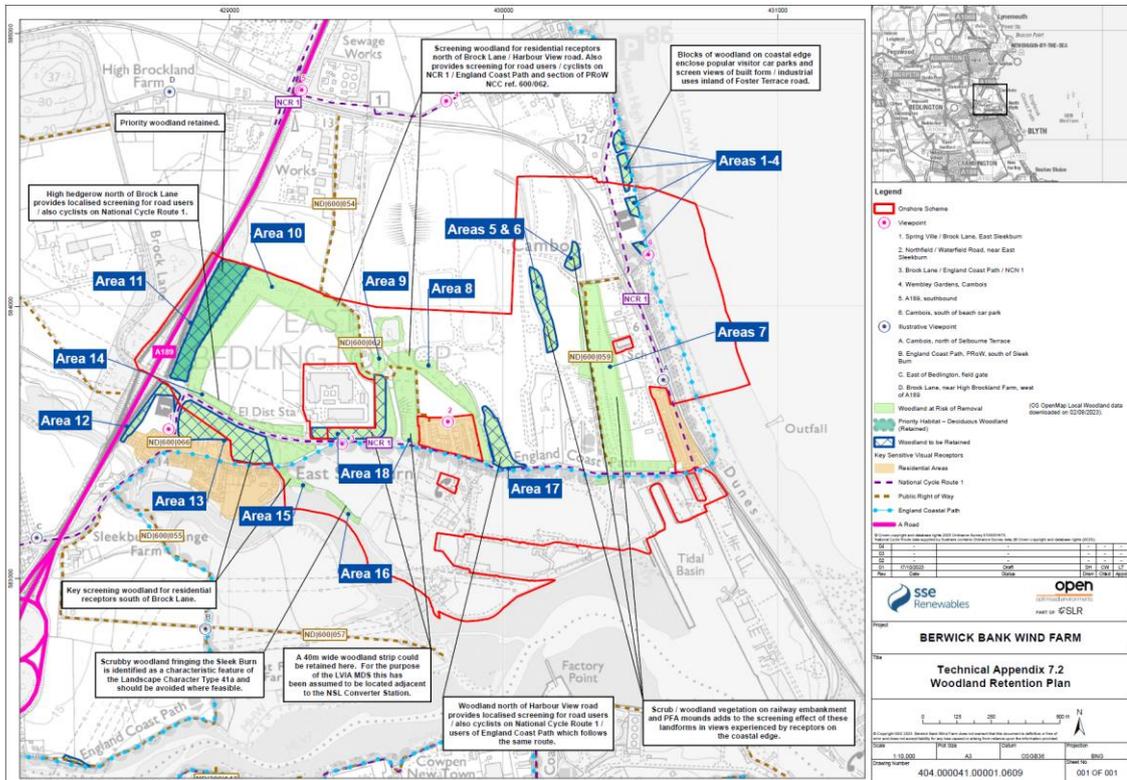
6.79 The supporting ES covers the full breadth of relevant technical considerations for the delivery of the Onshore Scheme, including any potential cumulative impacts in combination with other developments. The list of cumulative sites was agreed with NCC prior to the assessment. Therefore, the potential cumulative impact of the Onshore Scheme has been appropriately assessed.

6.80 As a result of the assessments, the Applicant has committed to a range of measures during the construction and operational periods (see ES Chapter 16). The measures include production and strict adherence to a CEMP which itself will set a series of measures and practices to be adhered to throughout construction such as working hours and machine operation to protect neighbouring amenity.



- 6.81 The Applicant has also committed to monitoring operation noise on nearby residential receptors once construction of the Onshore Scheme is complete to ensure the amenity of existing and residents is protected (see supporting ES Chapter 16).
- 6.82 In short, the Onshore Scheme has been carefully designed to accommodate the necessary technical requirements as well as the relevant QOP 1 and QOP 2 policy requirements. Further detail on how the Onshore Scheme complies with all of the relevant QOP 1 and QOP 2 policy requirements will be provided at the detailed planning stage.

**Figure 6.1: Woodland Retention Plan (reproduction of ES Appendix 7.4)**



**Technical Assessment**



- 6.83 The Outline Planning Application which this Planning Statement supports is accompanied by a full suite of technical assessments and a comprehensive ES which should be read as a whole. This supporting information covers the full breadth of relevant technical considerations for the delivery of the Onshore Scheme, including any potential cumulative impacts.
- 6.84 The technical information supporting this Out Planning Application demonstrates all potential impacts can be avoided, appropriately managed and / or mitigated. The key technical areas for delivery are summarised below.
- 6.85 **Appendix 1** to this Planning Statement provides a detailed assessment of the Onshore Scheme against all the relevant planning policy requirements.

### ***Highways and Transport***

- 6.86 The Onshore Scheme has the potential to cause some impacts on the highways network during construction and cumulatively with other developments. However, these impacts can be mitigated by strict travel management and adherence to best practices.
- 6.87 A baseline review of the existing highways network has identified no existing capacity issues on the local highway network in the highway peak hours (08:00 to 09:00 and 17:00 to 18:00) and no existing road safety problems. There are a number of formal Active Travel Routes ('ATRs') in the Study Area, including two national routes.
- 6.88 In terms of access for the Onshore Scheme, personnel access to the underground cable infrastructure, including the ancillary infrastructure such as communications boxes, is required for maintenance purposes. Access to the underground cable infrastructure can be achieved through strategically placed manholes which provide sufficient opportunity to undertake maintenance activities. Personnel can access the manholes with the necessary equipment on foot from the existing highway network and as such there is no requirement for permanent parking provision along the cable route. Traffic associated with maintenance activities will be minimal and as such have a negligible impact on the existing highway network.
- 6.89 Regular vehicular access and parking is required to the new Onshore Converter Station for operations staff to monitor and maintain electrical equipment and plant. As such, a connection to the local road network and new Onshore Converter Station will be required. The final location of the permanent access is not yet known but will be subject to a Reserved Matters Application(s) and be designed in consultation with the NCC Highways Department.
- 6.90 A number of potential impacts on traffic and transport sensitive receptors, associated with the construction and decommissioning phases of the Onshore Scheme, have been identified. These included driver delay (temporary land closure), community severance, vulnerable road users and



road safety, increase in traffic where a highway link intersects a formal ATR and the temporary diversion of a formal ATR. However, with the proposed mitigation measures in place – a Construction Traffic Management Plan, the design commitments in the supporting Design and Access Statement, a Travel Plan and Public Access Management Plan – all of these impacts result in effects of either negligible or minor adverse significance (not significant in EIA terms).

- 6.91 Cumulative impacts from the increase in vehicle movements associated with the Onshore Scheme and identified cumulative sites result in effects of negligible to minor significance (not significant in EIA terms) upon traffic and transport sensitive receptors for community severance and vulnerable road users and road safety and effects of moderate significance (significant in EIA terms) upon traffic and transport sensitive receptors for driver delay (temporary lane closure). However, with secondary mitigation measures including limiting duration of works as far as practicable, a coordinated approach to traffic control; and provision of a hardstrip for emergency use in place, this impact results in effects of minor adverse significance (not significant in EIA terms).
- 6.92 In short, the potential impacts that the Onshore Scheme may have on the highways network can be appropriately managed and mitigated by commitments to strict travel management and adherence to best practices. Therefore, the volume of traffic anticipated with the activities at the Onshore Converter Station is not deemed to have significant effect on the operation of the local highways network. As such, the Onshore Scheme does not trigger the severe impact test as outlined in NPPF Paragraph 111.
- 6.93 Further information on highways and transport can be found in Volume 2, Chapter 12 (Transport, Traffic and Access) in the supporting ES and the Design and Access Statement.

#### ***Ecology & Biodiversity Net Gain***

- 6.94 The Site is subject to a number of key habitats including part of the Site close to the eastern boundary is considered as the Sand Dune Priority Habitat and the Northumberland Shore SSSI which is of high ecological value, the northern boundary is subject to the saltmarsh priority habitat along the Sleekburn and woodland priority habitat adjacent to the A189 near the western boundary of the Site. This Outline Planning Application is supported by the relevant ecological surveys and assessments (*see supporting ES Chapter 9*).
- 6.95 The Onshore Scheme includes a number of designed in measures to minimise potential impacts on the key habitats including:
- Direct impacts on Northumberland Shore SSSI and priority sand dune habitats will be avoided via the use of trenchless techniques such as HDD under the beach and sand dunes.



- Priority woodland habitat to the west of the converter station zone and certain other areas of woodland within the site (as shown in Figure 6.1 above) will be avoided at the detailed design stage.
- Intertidal habitats in the Sleek Burn, where lying within the Site boundary, will all be avoided and the outfall into the Sleek Burn will not be located directly above areas of saltmarsh habitat.
- A swale will be constructed around the converter station which will eventually discharge into Sleek Burn Estuary. A minimum of two linked SuDS components will be constructed to filter the water prior to discharge.
- In order to avoid disturbance to wintering birds utilising the Sleek Burn construction works relating to the outfall into the Sleek Burn will be restricted to avoid the winter period (October to March inclusive).

6.96 The designed-in measures are proposed in combination with a number of tertiary mitigation measures such as general site good practice, habitat reinstatement, pollution control and Environmental Management Plan (see Table 9-13 of supporting ES Chapter 9).

6.97 The sensitive design and commitment to mitigation measures ensure that there are no identified significant residual effects arising from the Onshore Scheme. Where significant negative residual effects are identified they will be offset by compensatory habitat creation.

6.98 In addition, the Onshore Scheme seeks to deliver environmental enhancements, most notably in the form of Biodiversity Net Gain ('BNG').

6.99 BNG is an approach to development activities that leaves the natural environment in a measurably better state than it was before and is required by Policy ENV 2. BNG works with and does not replace the mitigation hierarchy. It does not replace existing legal requirements (e.g., in relation to protected species) and it should not be applied to compensate for impacts on irreplaceable habitats. The Onshore Scheme is cognisant of relevant good practice in respect of BNG and will align with the principles developed by CIEEM, IEMA and CIRIA (CIEEM, CIRIA and IEMA, 2016. Biodiversity Net Gain: Good Practice Principles for Development).

6.100 The Outline Planning Application which this Planning Statement supports is accompanied by a BNG Indicative Design Stage Report. For the purposes of this report, the worst-case scenario on multiple indicative options have been tested, aligned with the PDE approach and was agreed with the LPA prior to submission.

6.101 Calculations have been undertaken using the latest DEFRA metric (currently Biodiversity Metric 4.0) to ascertain the biodiversity of the site before and after based on the aforementioned worst-



case scenario. The approach taken identifies the maximum area of land required to achieve the BNG for the purposes of determining this Outline Planning Application.

- 6.102 The BNG Indicative Design Stage Report will be updated as part of the application(s) for the approval of Reserved Matters based on the final design of the Onshore Scheme and present the BNG approach for approval at that time.
- 6.103 The approach to the BNG Indicative Design Stage Report demonstrates that the Onshore Scheme is compliant with Policy ENV 2 and forthcoming national legislation (the Environment Act 2021).
- 6.104 In short, the Onshore Scheme has been designed to avoid potential impacts on the key local habitats and in addition will deliver a net benefit to the local environment by providing a biodiversity net gain.

### ***Flood Risk & Drainage***

- 6.105 The Site is predominantly located within an area of low flood risk. Some flood risk is identified in Landfall/HVDC Zone, by the coastal boundary, however the flood risk only affects construction activities which can be adequately mitigated through following industry practices as outlined in Volume 2 Chapter 10 Hydrology and Hydrogeology. Once complete the Onshore Scheme will not adversely affect flood risk in this area.
- 6.106 During construction, any trenching works on the Site which involves the removal of ground and subsequent stockpiling will follow relevant procedures for surface water management as outlined in the CEMP. Where surface water runoff has ponded within excavated trenches, this water will be pumped into an appropriate drainage receptor for settlement prior to discharge, to allow dry working conditions. The restriction of flows to greenfield rates into the receiving environment of either Maw Burn and Cow Gut will help to protect against flood risk being exacerbated downstream. It should be noted that both of these watercourse's discharge into tidal areas offsite, and therefore will have a negligible impact on water levels in the Sleek Burn, River Blyth and North Sea.
- 6.107 Once complete the Onshore Scheme will restore the cable route areas back to pre-development condition, where practicable, and as such will have negligible impact on flood risk.
- 6.108 Surface water drainage for the Converter Station, the most notable built structure post completion, will include consideration of detention basins which discharge all flows into the Sleek Burn as demonstrated in the Surface Water Drainage Strategy (See ES Volume 3, Technical Appendix 11.2). Prior to the construction of the Converter Station, the pond and associated drainage infrastructure will be installed at the Site which will protect against runoff into site watercourses from increasing during the construction phase.



6.109 In short, the Onshore Scheme has been appropriately designed to avoid areas of higher flood risk and any potential impacts can be appropriately mitigated by the proposed mitigation, most notably the Surface Water Drainage Strategy and the CEMP.

***Landscape***

6.110 The majority of the Onshore Scheme is underground and therefore once complete will have no landscape impact. Nevertheless, the Applicant has submitted a full assessment of landscape and visual impacts as presented in the Landscape and Visual Impact Assessment ('LVIA') (see ES Volume 2, Chapter 7).

6.111 The LVIA considers effects of the Onshore Scheme on landscape character and visual amenity within a Study Area up to 3 km from the Site. The assessment has been undertaken in accordance with all relevant published guidance and has involved desk-based and field-based assessments.

6.112 The LVIA concludes that construction of the Landfall and Onshore Export Cable would not give rise to significant landscape character effects and that likely significant construction effects would be localised, temporary and limited to visual effects upon higher sensitivity receptors in close proximity to the installation activity. No significant seascape character effects have been identified for the intertidal area and due to trenchless technology being proposed at the Landfall, no physical disturbance of the beach or intertidal area or physical effect would occur.

6.113 The LVIA identified that significant effects on the physical landscape would occur on woodland within the Site during the installation of the Landfall and Onshore Export Cable and construction of the Converter Station. However, the Applicant's commitment to retaining woodland within the Site has moderated the level of effect (see paragraph 6.68 above and Figure 6. 1).

6.114 For the Converter Station, significant effects on the landscape character of the LVIA study area have been identified during construction and operation at a localised range of approximately 0.5 km within the Converter Station Zone and its immediate environs and across both the host Landscape Character Area 41a: Blyth and Wansbeck Estuaries and a small area of the neighbouring Landscape Character Area 42a: Urban Fringe, Ashington, Blyth, and Cramlington. The LVIA found that construction of the Converter Station and installation of the Onshore Export Cable would give rise to significant visual effects, within approximately 1km of the Onshore Scheme. However, this assessment is precautionary at this stage and represents the worst case, maximum design scenario.

6.115 Such effects may be mitigated through the detailed design of the proposals, which would seek to avoid removal of key woodland. However, it is not possible for the Applicant to commit further to this at this stage or to the geographical area and location of any landscape mitigation (screening) proposals.



- 6.116 Notwithstanding this, the following key principles are considered to form an appropriate landscape and visual mitigation strategy for the Converter Station (to be confirmed as part of the detailed design):
- Proposed native species woodland to assist in mitigating visual effects and aid in visually integrating the proposed Converter Station, as far as practicable, within inland views from surrounding areas;
  - Understorey of native species woodland to be sown with a locally appropriate meadow wildflower mix or species rich grassland, with a grass free area around woodland plants for establishment;
  - Proposed native species hedgerows, or scrub vegetation (in areas not constrained by operational requirements for the Onshore Export Cable), in conjunction with proposed woodland planting, to increase habitat connectivity and diversity;
  - Proposed areas of locally appropriate species rich grassland and wet meadow habitat around SUDS ponds to enhance biodiversity;
  - Colour and finish of Converter Station buildings specified during the detailed design process should be consistent with the vernacular of large-scale industrial buildings within the local context;
  - Restoration of all temporary construction, material storage and laydown areas to reinstate ground cover and return to previous land-use, where practicable; and
  - Landscape mitigation proposals would be developed in consultation with key stakeholders, including NCC, and landowners.
- 6.117 More broadly, no significant cumulative effects have been found when considering the whole project effect (i.e., the total effect of the Onshore Scheme and the Marine Scheme).
- 6.118 Post construction, site reinstatement will include the removal of the Site construction offices and temporary facilities, land reinstatement and landscape works.
- 6.119 The final landscape scheme will be approved as part of the future Reserved Matters Application(s) and is inherently linked to the BNG approach given the interrelationship.
- 6.120 In short, the potential landscape and visual impacts of the Onshore Scheme have been comprehensively assessed and appropriate mitigation has been identified. In the instances where specific mitigation cannot be specified, such as the Onshore Converter Station, a strategy for identifying the final mitigation measures has been provided.



### **Noise & Vibration**

- 6.121 The supporting ES includes a noise and vibration assessment (see ES Chapter 13) which reviews the audible sound and physical vibration that will be emitted by the Onshore Scheme, through all phases.
- 6.122 Noise monitoring indicated that the baseline noise environment at the nearest noise and vibration sensitive receptors is predominantly rural, with the main noise sources in the area being noise from the sea, road traffic using the A189 and Brock Lane, with birdsong and other natural noises dominant in their absence.
- 6.123 A number of potential impacts on noise sensitive receivers, associated with the construction, operational and maintenance, and decommissioning phases of the Onshore Scheme, were identified. These included construction noise on nearby receptors, construction noise on ecological receptors, construction vibration on nearby receptors, operational noise on nearby receptors, operational noise on ecological receptors, and noise and vibration during decommissioning.
- 6.124 As part of the project design process, a number of measures have been proposed to reduce the potential for impacts on noise and vibration receptors (see ES Chapter 13, Table 13-22). These include measures which have been incorporated as part of the Onshore Scheme's design (referred to as 'designed in measures') and measures which will be implemented regardless of the impact assessment (referred to as 'tertiary mitigation'). As there is a commitment to implementing these measures, they are considered inherently part of the design of the Onshore Scheme and have therefore been considered in the assessment.
- 6.125 These measures are considered standard industry practice for this type of development and will be included within the final Noise and Vibration Management Plan (NVMP) which would be submitted to NCC as part of the final Code of Construction Practice (CoCP).
- 6.126 In addition, secondary mitigation measures have been identified such as mitigation of source noise levels and through good acoustic design of the Onshore Converter Station layout which will be confirmed as part of the detailed design.
- 6.127 At this stage of the design refinement procedure, the variabilities that define the extent of noise impact are not tightly defined due to the maximum design scenario, i.e., significant worst-case assumptions have been made. As a result, an adverse impact has been identified. However, it is considered that with the refinement of the Onshore Scheme design, and mitigation measures any adverse impact can be minimised reduced so as to not be significant. A detailed noise impact assessment will be submitted to Northumberland County Council to demonstrate that the refined project will comply with appropriate limits at the detailed design stage.



6.128 Cumulative impacts from the proposed industrial developments in the area will not result in an increase in adverse effects compared to that from the Onshore Scheme or the other developments individually, i.e., the Onshore Scheme will not increase any cumulative impact. For the proposed residential developments in the area, with the proposed mitigation measures in place, the Onshore Scheme will not result in significant adverse impact.

6.129 The potential noise and vibration impacts of the Onshore Scheme can be appropriately mitigated with the final mitigation measures to be confirmed at the detailed design stage. In short, noise does not present a prohibitive factor to the delivery of the Onshore Scheme.

### ***Heritage***

6.130 The supporting ES includes a Cultural Heritage and Archaeology assessment (see ES Chapter 8) which reviews the potential impacts from the Onshore Scheme on assets which contribute to the historic environment. A Study Area of 1 km from the Site boundary was used, direct impacts upon cultural heritage assets which outlie the Site boundary and indirect effects upon designated heritage assets where the Onshore Scheme will have no effect on an asset's setting were scoped out of the assessment.

6.131 The overall archaeological potential for the Site is considered generally low. This is due to the potential marginality of the majority of the Site prior to later industrial development. Known assets recorded on the HER comprise and prehistoric to Romano-British enclosures recorded via aerial photographs (HER Refs 11778 & 28577) and remnant medieval ridge and furrow (HER Ref 30269). These assets are located on higher dryer parts of the Site in the west. The history of industrial use within the Site has caused previous below-ground disturbance within the Site boundary.

6.132 Two Grade II Listed Buildings are located immediately outside the boundary of the scheme, being Cambois War Memorial (1391431), and Coal Staithes at Blyth Power Station (1041382), both located to the south-east of the Site. There were no identified indirect effects upon these designated heritage assets.

6.133 A number of potential impacts on non-designated heritage assets were identified associated with the construction phase of the Onshore Scheme. These are primarily impacts on the two enclosures (HER Refs 11778 & 28577) and unknown archaeological remains within previous undisturbed areas, within the footprint of the Onshore Scheme, leading to minor to moderate adverse effects which are not significant in EIA terms. Other impacts were considered negligible to moderate adverse and not significant.

6.134 Cumulative impacts on non-designated heritage assets would be on negligible to minor significance (not significant in EIA terms).



6.135 Archaeological mitigation is proposed in the form of a Written Scheme of Investigation, a watching brief or other works deemed appropriate by the Local Authority – these may include pre-commencement works. However, the potential impacts remain unchanged as the assets would still be removed although the potential impacts identified are not significant in EIA terms.

6.136 In short, heritage impacts do not present a prohibitive factor to the delivery of the Onshore Scheme.

### **Planning Balance**

6.137 The Onshore Scheme is inherently sustainable by providing the infrastructure necessary to facilitate the delivery of the renewable energy generated by BBWF. The Project, of which the Onshore Scheme forms part, will make a substantial contribution to harnessing such energy and thus meeting nationally binding targets to reduce greenhouses gas emissions.

6.138 It has been demonstrated that the Onshore Scheme is in compliance with part g (vi) of Policy STP 1 as well as the other Local Plan Policies. It has also been demonstrated that the Onshore Scheme is compliant with the objectives of national planning policy and NCC's climate emergency declaration. Therefore, the principle of development has been established.

6.139 In addition, the supporting information which forms part of the Outline Planning Application which this Planning Statement supports, has demonstrated that there are no prohibitive factors to the delivery of the Onshore Scheme.

6.140 The Onshore Scheme is inherently sustainable, the principle of development has been established and there are no prohibitive factors to delivery. The notable benefits of the Onshore Scheme include but are not limited to the following:

- The Onshore Scheme forms part of the Project which has the potential capacity to generate an estimated 4.1GW, which once built will be one of the largest offshore wind farms in the world.
- The Project, of which the Onshore Scheme forms part, will make a significant contribution to the decarbonisation efforts of the UK with an estimated generating capacity of 4.1 gigawatts (GW), contributing 37% of the UK's target of 11 GW of installed offshore wind capacity by 2030.
- Macro economic benefits of the Project (including the Onshore Scheme), as detailed in the needs case above, related to improving the affordability of electricity and expanding the industry knowledge.



- The Applicant has committed to preparing a Supply Chain Engagement Plan (see *Chapter 16 of the supporting ES*) which will set out initiatives to enhance opportunities for procurement from local suppliers and to drive the investment in new facilities associated with the development, manufacturing and supply, and construction / installation supply chain.
- The Applicant has committed to engaging with the host community throughout the project lifecycle, from conception, through consultation, into construction, operation and leaving a lasting legacy. To support this, the Applicant has appointed a dedicated Stakeholder Engagement Manager to act as a single point of contact for the community.
- The provision of biodiversity net gain providing an overall enhancement to the local environment.

6.141 In short, the benefits outweigh any potential harms. Therefore, the planning balance is clearly and demonstrably in favour of the approval of the Onshore Scheme.



## 7.0 Conclusion

- 7.1 This Planning Statement has been prepared on behalf of BBWFL to apply to NCC for outline planning permission for the Onshore Scheme.
- 7.2 The Onshore Scheme comprises of the following elements:
- Landfall works;
  - A new Onshore Converter Station;
  - Onshore export cables within a cable corridor between the Landfall and the new Onshore Converter Station for a cable corridor length of up to 2.1 km;
  - Onshore grid cables from the Onshore Converter Station to the National Grid Blyth substation for a cable corridor length of up to 1.5 km; and
  - Associated ancillary infrastructure.
- 7.3 The Site is situated near Blyth and the villages of Cambois and East Sleekburn in Northumberland and covers approximately 188ha. The boundary and extent of the Site have been the subject of discussions with the LPA. It has been agreed that the Site boundary can be sufficiently broad to accommodate the planning and design approach.
- 7.4 The final Onshore Scheme is not yet determined, there are certain design details that remain to be finalised following further design with the benefit of information on ground conditions across the Site, ongoing engineering design work and the procurement of cable and converter station suppliers.
- 7.5 Due to the design details that are yet to be finalised, the Applicant has adopted a PDE approach to the Onshore Scheme in line with current best practice and principles. By following a PDE approach, a maximum design scenario can be defined for key components of the Onshore Scheme, such as the landfall, onshore cables, and converter station.
- 7.6 The Outline Planning Application which this Planning Statement supports seeks planning consent for the principle of the Onshore Scheme within the Site boundary based on the maximum design scenario. The Onshore Scheme will then be subject to a application(s) for their approval of Reserved Matters which will seek consent for the final scheme and cable route.
- 7.7 The approach to planning and design was agreed with NCC prior to the submission of the Outline Planning Application.



- 7.8 Policy STP 1 sets the spatial strategy for Northumberland and directs development towards established settlements. Outside of these settlements, development is required to meet at least one of the specified exceptions. The Site is situated outside one of the established settlements and considered in planning terms to constitute ‘the open countryside’.
- 7.9 The most relevant Policy STP 1 exception to the Onshore Scheme is part g (vi) which states that development in the open countryside will be supported if it can be demonstrated that it provides for essential transport, utilities and energy infrastructure in accordance with other policies in the Local Plan. Essential is a high policy test that requires clearly and demonstrably evidence.
- 7.10 Climate change poses a severe threat that demands urgent attention. Coupled with that is the drive towards Net Zero which is legally binding and requires the UK to decarbonise all aspects of daily life including electricity generation. At a local scale, NCC acknowledge the urgency of the issue and declared a climate emergency and have set a goal to half the Council’s carbon footprint by 2025 and make the County carbon neutral by 2030.
- 7.11 The Onshore Scheme should be considered as essential infrastructure, as per the requirements of Policy STP 1, because it is necessary to enable the realisation of renewable energy from the Project which will provide an estimated generating capacity of 4.1 gigawatts (GW). The renewable energy generated from the Project would make a substantial contribution to both the UK’s and Northumberland County’s decarbonisation efforts and contribute 37% of the UK’s target of 11 GW of installed offshore wind capacity by 2030. Therefore, the Onshore Scheme clearly provides essential energy infrastructure in accordance with part g(vi) of Policy STP 1.
- 7.12 This Planning Statement and the supporting information have demonstrated that the Onshore Scheme is compliant with the other policies in the Local Plan, most notably Policy STP 2, Policy STP 3, Policy STP 4, Policy REN 1, Policy ECN 1 and Policy ECN 2, thereby satisfying all requirements of Policy STP 1 and establishing the principle of development.
- 7.13 The principle of development is further supported by compliance with the objective of national planning policy and NCC’s climate emergency declaration.
- 7.14 Furthermore, the technical information supporting this planning application has demonstrated that there are no prohibitive factors to the delivery of the Onshore Scheme. Most notably, the Onshore Scheme has been sensitively designed to mitigate potential impacts on the Sand Dune Priority Habitat Part, the Northumberland Shore SSSI, the saltmarsh priority habitat along the Sleekburn and woodland priority habitat adjacent to the A189 during construction and operation.
- 7.15 In short, the principle of development has been established, it has been demonstrated that the Onshore Scheme is in accordance with the Development Plan, is also supported by other material



considerations and there are no prohibitive technical factors. The planning balance is clearly and demonstrably in favour of the approval of the Onshore Scheme.

7.16 Therefore, planning permission must be granted without delay as required by national planning policy.



## Appendix 1: Detailed Planning Policy Assessment

Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
Policy STP 1	<b>Spatial Strategy (Strategic Policy)</b> aims to deliver sustainable development which enhances the vitality of communities across Northumberland, supports economic growth and conserves and enhances the county’s environmental assets.	See paragraphs 6.16 – 6.20 of this Planning Statement.
Policy STP 2	<b>Presumption in favour of sustainable development (Strategic Policy)</b> outlines that the Council takes an approach to planning applications which reflects the presumption in favour of sustainable development contained in the NPPF.	See paragraphs 6.21 – 6.27 of this Planning Statement.
Policy STP 3	<b>Principles of sustainable development (Strategic Policy)</b> outlines that development proposals in Northumberland will be considered as sustainable development, so long as they adhere to the outlined economic, social and environmental principles outlined in this policy.	See paragraphs 6.28 – 6.38 of this Planning Statement.
Policy STP 4	<b>Climate change mitigation and adaptation (Strategic Policy)</b> makes clear that development proposals should mitigate climate change and contribute to meeting nationally binding targets to reduce greenhouse gas emissions; as well as support adaptation to climate change, be resilient to climate	See paragraphs 6.39 – 6.40 of this Planning Statement.



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
	change and not make neighbouring areas more susceptible to the negative impacts of climate change.	
Policy STP 5	<b>Health and wellbeing (Strategic Policy)</b> makes clear that development which promotes, supports and enhances the health and wellbeing of communities' residents, workers and visitors will be supported.	The Onshore Scheme will improve the economic, social and environmental conditions of the area ( <i>see paragraphs (see 6.21 – 6.27 of this Planning Statement)</i> ). By virtue, the Onshore Scheme will enhance the health and wellbeing of communities and as such is in full accordance with Policy STP 5.
Policy STP 6	<b>Green infrastructure (Strategic Policy)</b> outlines that development proposals should, where relevant, seek to protect, improve, and extend Northumberland's green infrastructure and integrate within the network.	<p>The Applicant has committed to a series of 'designed in measures' (<i>see Chapter 16 of the supporting ES</i>) as part of the maximum design scenario. With regards to trees, green and blue infrastructure specifically, there are designed in measures which specify priority woodland habitat and other areas of woodland within the Site which will be avoided (<i>see Figure 6.1 overleaf</i>), commitments to the construction of a swale for drainage which will maximise the use of native plants and ecological connectivity and commitments to avoiding mixing topsoil with subsoil.</p> <p>The Onshore Scheme also includes a biodiversity net gain which will increase the diversity of habitats and contribute to wider environmental net gains. Therefore, the Onshore Scheme has sought to retain the key trees, green and blue infrastructure as well as integrate enhancements to the local environment. In short, full compliance with Policy STP 6 has been demonstrated.</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
Policy ECN 1	<p><b>Planning strategy for the economy (Strategic Policy)</b> states the plan aims to deliver economic growth, while safeguarding the environment and community well-being, so helping to deliver the objectives of the Council's economic strategy.</p>	See paragraphs 6.45 – 6.46 of this Planning Statement.
Policy ECN 2	<p><b>Blyth Estuary Strategic Employment Area (Strategic Policy)</b> makes clear that land at the Blyth Estuary is allocated as a “Strategic Employment Area” within which the following sectors within the main employment industrial uses will be prioritised:</p> <ul style="list-style-type: none"> <li>• Low carbon and related environmental goods and services.</li> <li>• Offshore and sub-sea engineering;</li> <li>• Energy generation sectors with special emphasis on renewable and low carbon;</li> <li>• Development which will support and strengthen the economic role of the Port of Blyth.</li> </ul>	See paragraph 6.47 of this Planning Statement.
Policy ECN 5	<p><b>Large-scale windfall employment development (Strategic Policy)</b> outlines that development proposals for large-scale major business development for main employment uses, either as a standalone proposal or an extension of an existing business will be supported on land, which is not designated as</p>	The majority of the Onshore Scheme is designed at employment land but for completeness the areas of the Site not designated have been assessed against the requirements of Policy ECN 5:



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
	<p>employment land subject to robust demonstration that certain factors detailed within the policy are met.</p>	<ul style="list-style-type: none"> <li>a. The Onshore Scheme represents a major inward economic investment and will provide a significant number of jobs.</li> <li>b. The Onshore Scheme cannot be accommodated on other allocated employment land due to the technical and operational requirements. The majority of the Site is allocated for employment in any event.</li> <li>c. The Onshore Scheme is supported by an ES which has reviewed the potential cumulative impacts of the development. It has been determined that the proposal would not compromise the viability of deliverability of sites allocated for development.</li> <li>d. The Onshore Scheme is infrastructure and as such can be satisfactorily accommodated.</li> <li>e. The Onshore Scheme is not defined as office use.</li> </ul> <p>In short, the Onshore Scheme has met all of the policy requirements and full compliance is achieved.</p>
<p>Policy QOP 1</p>	<p><b>Design principles (Strategic Policy)</b> sets out the design principles which should underpin the design of any new proposed development in Northumberland, which will ensure the development contributes positively to local character and distinctiveness and contribute to a positive relationship between built and natural features, including landform and topography.</p>	<p>See paragraphs 6.50 – 6.71 of this Planning Statement.</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
Policy QOP 2	<b>Good design and amenity</b> seeks to ensure that new development has a positive impact on amenity and sets out the criteria for this to be achieved.	See paragraphs 6.72 – 6.82 of this Planning Statement.
Policy TRA 1	<b>Promoting sustainable connections (Strategic Policy)</b> demonstrates how Transport Assessments, Transport Statements and Travel Plans can be used to address transport implications and promotes sustainable connections within applications.	This Outline Planning Application is supported by the relevant transport and highways assessments as required by Policy TRA 1 & TRA 2.  A number of potential impacts on traffic and transport sensitive receptors, associated with the construction and decommissioning phases of the Onshore Scheme, have been identified. These included driver delay (temporary land closure), community severance, vulnerable road users and road safety, increase in traffic where a highway link intersects a formal ATR and the temporary diversion of a formal ATR. However, with the proposed mitigation measures in place – a Construction Traffic Management Plan, the design commitments in the supporting Design and Access Statement, a Travel Plan and Public Access Management Plan – all of these impacts result in effects of either negligible or minor adverse significance (not significant in EIA terms).
Policy TRA 2	<b>The effects of development on the transport network</b> outlines the criteria which developments which are considered to impact the transport network are required to adhere to.	In short, the potential impacts that the Onshore Scheme may have on the highways network can be appropriately managed and mitigated by commitments to strict travel management and adherence to best practices. Therefore, the volume of traffic anticipated with the activities at the Onshore Converter Station is not deemed to have significant effect on the operation



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
		<p>of the local highways network. As such, the Onshore Scheme does not trigger the severe impact test as outlined in NPPF Paragraph 111. Equally, existing active travel routes will be maintained once the Onshore Scheme is implemented and operational.</p> <p>Therefore, the Onshore Scheme is in full compliance with policies TRA 1 and TRA 2. Further information on highways and transport can be found in Volume 2, Chapter 12 (Transport, Traffic and Access) in the supporting ES and the Design and Access Statement.</p>
Policy ENV 1	<p><b>Approaches to assessing the impact of development on the natural, historic, and built environment (Strategic Policy)</b> details that NCC's approach to environmental issues including the natural, historic and built environments. The policy details how NCC will give appropriate weight to conserving and enhancing designated assets. The policy also details how an ecosystem approach will be taken to demonstrate an understanding of the significance and sensitivity of natural resources.</p>	<p>The Onshore Scheme delivers a biodiversity net gain resulting in a greater diversity of species and habitats across Northumberland, thereby contributing to the enhancement of Northumberland's natural environment. The biodiversity net gain is in addition to the macro environmental benefits of facilitating renewable energy generation and the drive to Net Zero.</p> <p>The Applicant has also committed to a series of 'designed in measures' (see Chapter 16 of the supporting ES) as part of the maximum design scenario. With regards to trees, green and blue infrastructure specifically, there are designed in measures which specify priority woodland habitat and other areas of woodland within the Site which will be avoided (see Figure 6.1 overleaf), commitments to the construction of a swale for drainage</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
		<p>which will maximise the use of native plants and ecological connectivity and commitments to avoiding mixing topsoil with subsoil.</p> <p>In short, the Applicant has demonstrated how the potential environmental impacts of the Onshore Scheme have been comprehensively assessed, considered, and mitigated. The Onshore Scheme will have a positive effect on the environment and as such is in compliance with Policy ENV 1.</p>
Policy ENV 2	<p><b>Biodiversity and geodiversity</b> focuses on the effects of development on biodiversity and geodiversity; addressing minimising adverse impacts, and maximising opportunities for biodiversity net gain. There is a specific focus within the policy upon addressing adverse effects on habitats and species.</p>	<p>The Outline Planning Application is supported by a BNG Indicative Design Stage Report. For the purposes of this report, the worst-case scenario on multiple indicative options have been tested, aligned with the PDE approach and was agreed with the LPA prior to submission.</p> <p>Calculations have been undertaken using the latest DEFRA metric (currently Biodiversity Metric 4.0) to ascertain the biodiversity of the site before and after based on the aforementioned worst-case scenario. The approach taken identifies the maximum area of land required to achieve the BNG for the purposes of determining this Outline Planning Application.</p> <p>The BNG Indicative Design Stage Report will be updated as part of the application(s) for the approval of Reserved Matters based on the final design of the Onshore Scheme and present the BNG approach for approval at that time.</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
		<p>The approach to the BNG Indicative Design Stage Report demonstrates that the Onshore Scheme is compliant with Policy ENV 2 and forthcoming national legislation (the Environment Act 2021).</p>
Policy ENV 7	<p><b>Historic environment and heritage assets</b> states that development proposals will be assessed and decisions made that ensure the conservation and enhancement of the significance, quality and integrity of Northumberland’s heritage assets and their settings. Decisions that affect any heritage assets will be based on a sound understanding of the significance of the asset and the impact of any proposal upon that significance.</p>	<p>See paragraphs 6.130 – 6.136 of this Planning Statement.</p>
Policy WAT 1	<p><b>Water quality</b> makes clear that the Council aim for all water bodies to achieve ‘good status’ by 2021 in terms of their ecological balance and prevent any deterioration from that status.</p>	<p>The cables for the Onshore Scheme will be installed within water resilient ducts with little to no leaching potential. On this basis, the HVDC/HVAC cable routes during the operational phase will have negligible impact on water quality. Surface water drainage provided for the onshore Converter Station has been designed in line with pollution mitigation requirements (Technical Appendix 11.2). The Onshore Scheme proposes to use two ponds to provide filtration for any pollution which is shed from the Converter Station (very low hazard). The drainage design satisfies the requirements of the Simple Index Method, as outlined in The SuDS Manual, CIRIA C753, and provides the satisfactory pollution remediation for hydrocarbons,</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
		<p>metals and total suspended solids. The surface water drainage infrastructure will be regularly maintained to ensure efficiency of the scheme. The likelihood of deterioration of water quality through the operational phase of the onshore Converter Station development is very low.</p> <p>Water quality is assessed in detail in Volume 3, Technical Appendix 11.1 Onshore Cable Corridor Flood Risk Assessment and Volume 3, Technical Appendix 11.2 Converter Station Flood Risk Assessment. Please also refer to Section 11.11 of the supporting ES Chapter 11. In short, full compliance with this policy has been achieved.</p>
Policy WAT 3	<p><b>Flooding</b> seeks to minimise surface water run off and the risk of flooding from potential development.</p>	<p>See paragraphs 6.101 – 6.105 of this Planning Statement. The Onshore Scheme has been carefully designed to not increase flood risk off Site and has been designed to avoid areas of higher flood risk. Please refer to ES Chapter 11 for further detail. In short, full compliance with this policy has been achieved.</p>
Policy WAT 5	<p><b>Coastal erosion and coastal change management</b> outlines NCC's approach to areas vulnerable to coastal change. The policy details that vulnerable areas will be managed in accordance with the Shoreline Management Plan, while full weight will be given to the level of importance of the coast's ecological and heritage value.</p>	<p>The Applicant has committed to avoidance of the intertidal area at Cambois beach through the use of trenchless techniques at the Landfall, avoidance of sensitive habitats such as the Northumberland Shore SSSI. Please refer to ES Chapter 9 for further detail. In short, full compliance with this policy has been achieved.</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
Policy MIN 4	<p><b>Safeguarding mineral resources (Strategic Policy)</b> outlines that applications for new development in the vicinity of an existing or permitted mineral extraction site must demonstrate that the new development will not prevent or prejudice the current or future use of the site.</p>	<p>The Onshore Scheme will not prevent mineral extraction across the entire Site as it will utilise a relatively narrow underground corridor, which will be determined at the final design stage, at a relatively shallow depth. Equally, the area proposed for that corridor and the Onshore Converter Station is not of sufficient scale to viably extract the minerals pre-development. The Onshore Scheme has an operational lifetime of 35 years, and will be decommissioned following this, and therefore will not impact upon the potential for mineral extraction within the timescale it is needed, in addition the benefits of the Onshore Scheme outweigh any loss of mineral resource, as detailed in section 6.0 of this Planning Statement.</p> <p>The Outline Planning Application is supported by an assessment of the effect of the Onshore Scheme on the mineral resource within the Study Area in section 10.11 of Volume 2 Chapter 10 Geology and Soils of the ES.</p>
Policy REN 1	<p><b>Renewable and low carbon energy and associated energy storage</b> sets out that renewable and low carbon energy proposals will be supported if applicants are able to demonstrate that its effects are acceptable or can be made acceptable. This includes criteria against which the</p>	<p>See paragraphs 6.41 – 6.44 of this Planning Statement.</p>



Policy	Policy Requirement(s) Summary	Onshore Scheme Compliance
	acceptability of proposed developments will be assessed alongside other policies in the plan.	

