

From: [REDACTED]
To: [North Falls](#)
Cc: [REDACTED]
Subject: Response the Netherlands to North Falls Offshore Wind Farm
Date: 14 March 2025 10:24:52
Attachments: [North Falls Offshore Wind Farm Statutory Consultation - reaction from the Netherlands .msg](#)

[REDACTED]

Dear sir / madam,

Thank you for the opportunity to react on the proposed developments of North Falls Offshore Wind Farm, following the letter dated 4 February 2025 with reference number EN010119. As we are unfortunately not able to attend the online hearings scheduled for 8 and 9 April 2025, we would like to provide feedback in writing. We would welcome the opportunity to stay involved in the remainder of the process on a regular basis.

In August 2023 the Netherlands provided a first response to the proposed developments of North Falls Offshore Wind Farm. We would like to reiterate those points once again as these continue to be important for us. Please find the original email attached.

We hope that our response is helpful to your process. We would appreciate it to keep in touch about the mentioned issues and hope you will provide us with more information on the further process. If there are any questions, please do not hesitate to get in touch.

With kind regards,



[REDACTED]
Advisor North Sea

Rijkswaterstaat
Ministry of Infrastructure and Water Management
Visitors address: Lange Kleiweg 34 | 2288 GK | Rijswijk
Correspondance address: Postbus 2232 | 3500 GE | Utrecht
Invoice address: Postbus 2232 | 3500 GE | Utrecht

[REDACTED]

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Water. Wegen. Werk. Rijkswaterstaat

From: [REDACTED]
[REDACTED] ["contact@northfallsoffshore.com"](mailto:contact@northfallsoffshore.com)
Cc: [REDACTED]
Subject: North Falls Offshore Wind Farm: Statutory Consultation - reaction from the Netherlands
Attachments: [image002.png](#)

Dear Sir or Madam,

The Netherlands acknowledges the receipt of the Espoo notification and information regarding the proposed North Falls Offshore Wind Farm (reference: 004788663-01).

The Netherlands does not have objections concerning the developments. However, we wish to point out that a number of crucial aspects deserve more attention. We would ask to inform us on if/ how our concerns, and the identified omissions in the assessment will be addressed and if deemed necessary, what additional mitigating measures will be proposed.

The Netherlands would like to stress the importance of including:

- 1) up-to-date information of policy and spatial plans of other North Sea countries. The current report does not consider the Natura2000 area "Bruine Bank" in the Dutch EEZ (which lies near the North Sea Falls area) nor the more recent windfarm plans (Dutch offshore wind farm developments until 2030). Therefore the current assessment of the environmental effects is deemed insufficient. Information on Dutch offshore wind development can be found here (the information will be further updated during this summer):
<https://www.noordzeeloket.nl/en/functions-and-use/offshore-wind-energy/energy-transition-north-sea/>
- 2) an assessment of cumulative effects as part of the Environmental Impact Assessment. We refer here to cumulative impacts on several of the considered species of the windfarms from different North Sea countries. These should be considered to get a comprehensive picture of the transboundary effects in cumulation on:
 - (migratory) birds, especially considering effects on the Natura2000 areas relevant for migratory species
 - mobile species such as the harbour porpoise (regarding underwater noise)It is unclear how cumulative effects are assessed. The assessment indicates that habitat loss and collisions are included in the assessment, but also due to not all Dutch Offshore Wind Developments (planned windfarms) being included, the cumulative assessment is in our view insufficient. There is no cumulating of effects on an international level for birds, and certainly for Common guillemot and Northern garnets this would be of utmost importance.
- 3) mitigation measures: including considering options on limiting underwater noise for marine mammals. The Netherlands (and Germany and Belgium) include this kind of information in EIAs including establishing a standard for underwater noise (impacts).
- 4) (broader) ecosystem effects (e.g. stratification) in the assessment (those are missing now). In the current report it is not clear on the basis of which information the conclusion was drawn that there are no transboundary ecosystem effects to be expected.
- 5) effects on marine mammals, for instance related to underwater noise. More information over which species were included and on which information is available for (a part of) the species.
- 6) effects on bats. Bats are only mentioned in relation to effects on ecology on land (linked to the planned infrastructure on land). The effects of offshore wind farms on migrating bats

are not included in the assessment.

7) effects on birds:

- a. The Northern fulmar and the Sandwich tern are not considered concerning habitat loss, please do consider these as they are sensitive species.
- b. The Razorbill and the Sandwich tern are included, but they need some extra attention concerning cumulative impacts and the effects of international offshore windfarm developments. With the reasoning applied it is concluded that the ecological effects are lower. However we do not agree with the reasoning. The effects should be assessed in a quantitative manner.
- c. For the Razorbill (*Alca torda*) birds there are quite high mortality rates. This is problematic. The same applies to the Northern gannet. How will this be taken into consideration in the developments? Will specific measures be taken or will the plans be altered in any way? Will this be assessed further?

8) effects on commercial fisheries. There is an impact on the Dutch commercial fisheries as chapter 14 of the offshore PEIR describes. The area consists of important fishing grounds for various demersal and pelagic fisheries that use beam trawls and seine netting (demersal) and midwater otter trawls (pelagic). Chapter 14 already analyses the expected short- and long-term impact for different fisheries on the access to the fishing grounds.

The Netherlands would like to request that the analysis also looks at the economic value of the fisheries and accounts for possible economic losses that may occur due to lack of or lesser access to important fishing grounds.

It is important to note that whilst the Dutch do not have historic rights in the given area, the Netherlands does have a share in the quota in these waters, for instance mackerel (MAC/2A34) and horse mackerel (JAX/4BC7D and JAX/2A-14). The construction of North Falls poses the risk that fisheries may fail to take advantage of fishing their share of quota due to the construction in these specific areas. Therefore the Netherlands would like to know what the government or wind farm operators can do to further mitigate potential losses and facilitate commercial fisheries in the area.

9) aspects concerning safety of navigation: Transboundary effects on shipping are not expected. However, multiple conflicts with local ships' routing measures require attention. International coordination is recommended and the Netherlands likes to be involved. The following conflicts are identified:

- a. The distances between the traffic separation schemes and the planned wind farms may not comply with paragraph 3.14 of the general provisions on ship routing. To ensure safe distances, it is recommended to adopt the NCSR 7-INF.15 report from the World Association for Waterborne Transport Infrastructure (PIANC).
- b. The impact of the irregular shapes on ships' situational awareness.
- c. The overlap between the southern wind farm and the precautionary area.
- d. The positioning of the western border of the northern wind farm that is located within the boundaries of the adjacent traffic separation scheme.
- e. The galloper recommended route (ferries) located within the southern wind farm area.

We would appreciate if you could inform us to which degree the aspects we mention above concerning gaps in the assessment can still be filled.

With kinds regards,



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Rijkswaterstaat Zee en Delta
Afd. netwerkontwikkeling en visie
Sr Adviseur Noordzee
Bezoekadres: Lange Kleiweg 34 | 2288 GK Rijswijk
Postadres: Postbus 2232 / 3500 GE Utrecht
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Vrij op vrijdag

Van: [REDACTED]
Verzonden: woensdag 17 mei 2023 14:52
Aan: [REDACTED]
Onderwerp: FW: North Falls Offshore Wind Farm: Statutory Consultation

Beste Mareike,

Bijgaand een notificatie van het project 'North Falls Offshore Windfarm', 22,5km voor de kust van Essex (Verenigd Koninkrijk) met mogelijk grensoverschrijdende effecten. Begin 2022 hebben we van dit project een kennisgeving en screening document ontvangen.

Het project is nu in de 'pre-application' fase voor de goedkeuring. Bij deze procedure hoort een voorlopig milieueffectrapport (preliminary environmental information report). Bij deze fase hoort ook internationale consultatie. Deze loopt van 16 mei tot 14 juli.

Zet jij het door naar de juiste personen?

Met vriendelijke groet,

Gisa Vos

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Espoo point of contact
Ministerie van Infrastructuur en Waterstaat
[REDACTED]
.....

Van: northfallsconsents@rwe.com <northfallsconsents@rwe.com>
Verzonden: maandag 15 mei 2023 11:20
Aan: point-notification.espoo (WVL) [REDACTED]
CC: northfallsconsents@rwe.com
Onderwerp: North Falls Offshore Wind Farm: Statutory Consultation

North Falls Offshore Wind Farm: Statutory Consultation
Section 42 of the Planning Act 2008 and/or Regulation 13 of the Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017

Good morning,

We are writing to consult with you on the proposed North Falls Offshore Wind Farm ("North Falls" or "the Project") that is being promoted by North Falls Offshore Wind Farm Limited ("the Applicant"), an equal joint venture between SSE Renewables and RWE.

You have been identified as a consultee for the purposes of Section 42 of the Planning Act 2008 ("the Act") and/or Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"), or it has been decided it is appropriate to write to you as a non-statutory consultee. The consultation includes:

- Prescribed bodies, host and neighbouring authorities, and any persons with an interest in the land affected by the Project under Section 42 of the Act;
- Affected local communities under Section 47 of the Act; and
- General publicity under Section 48 of the Act.

The consultation commences on 16 May 2023 and will close at 23.59 on 14 July 2023. Please see below for information on how to view and comment on the Project.

Project description

North Falls is a proposed offshore wind farm located in the southern North Sea, approximately 20 kilometres from the East Anglia coast at its nearest point. An offer has been accepted from National Grid for an onshore grid connection in Tendring, North Essex, approximately 20 kilometres from its likely landfall location for that connection option near Frinton-on-Sea. North Falls is set to support the UK's target of 50GW of installed offshore wind capacity by 2030. North Falls comprises:

- Up to 72 offshore wind turbine generators
- Up to two offshore substation platforms
- Platform interconnector cables
- Inter-array cables
- Three options for transmission infrastructure:
 - Option 1:** Onshore electrical connection at a National Grid connection point within Tendring, Essex, with a project alone onshore cable route and onshore substation infrastructure;
 - Option 2:** Onshore electrical connection at a National Grid connection point within Tendring, Essex, sharing all or part of an onshore cable route with separate onshore export cables with another project (such as Five Estuaries) where practicable, or
 - Option 3:** Offshore electrical connection supplied by a third-party electricity network provider. Such a connection will potentially be identified through the OTNR process.

It is anticipated the proposed development consent order (DCO) will, among other things, authorise:

- Construction, operation and maintenance and decommissioning of an offshore wind generating station and associated development comprising Project;
- The compulsory acquisition of land, and imposition of restrictions, powers to override suspend or extinguish rights over land and the temporary use of land;
- The application, modification and/or disapplication of legislation relevant to the Project including that relating to the compulsory acquisition of land; and
- Such ancillary, incidental and consequential provisions, licences, property rights, permits and consents as are necessary and/or convenient.

More detailed information is provided within the consultation materials.

Application for a Development Consent Order

The Project will have a generating capacity exceeding 100MW and is therefore classified as a Nationally Significant Infrastructure Project (NSIP) for which a Development Consent Order (DCO) is required. The DCO application will contain full details of the Project and will be accompanied by an Environmental Statement in accordance with the Act and the EIA Regulations.

North Falls is currently in the pre-application phase of the DCO application process. In accordance with the Act, the Applicant is required to consult on the proposed application prior to submission, and for application to have regard to consultation responses. A consultation report outlining the consultation processes undertaken, and how the responses have informed the final design of the Project will be included in the DCO application documents.

If the DCO application is accepted, the Planning Inspectorate will process and examine the application and make a recommendation for approval or refusal to the Secretary of State for Energy

Security and Net Zero. The final decision to approve or refuse the application will be made by the Secretary of State.

Consultation materials

The Applicant has prepared a Preliminary Environmental Information Report (PEIR) which has been informed by the Scoping Opinion issued by the Planning Inspectorate and which reports the results of the Environmental Impact Assessment (EIA) undertaken to date. The PEIR forms the basis of this consultation and also includes a Non-technical Summary (NTS). Its purpose is to enable consultees to understand the likely significant environmental effects of the project and to inform consultation responses. Please note however that EIA is an ongoing process and so the information contained within the PEIR is subject to change as the design develops.

From the start of the statutory consultation on 16 May 2023, the North Falls Preliminary Environmental Information Report (PEIR), a non-technical summary (NtS) providing an overview of the proposals, consultation booklet and other documents, plans and maps showing the nature and location of the Project will be available to view and download free of charge via the consultation portal (www.stat.northfallsoffshore.com), which can also be accessed via the project website (www.northfallsoffshore.com). The PEIR chapters and reports can be accessed directly (www.northfallsoffshore.com/peir). Hard copies will also be available on request; details of how to request hard copies and any related charges, are set out in the Section 48 Notice. These documents, plans and maps will be available on the consultation portal until at least the end of the statutory consultation period at 11.59pm on 14 July 2023.

Please find attached the notice which publicises the consultation, as required by Section 48 of the Planning Act 2008 and Regulation 13 of the EIA Regulations. This includes further details of how to obtain copies of the consultation materials, together with other relevant information including the consultation events taking place.

Consultation responses

Responses to this consultation must be received no later than 11:59pm on the 14 July 2023. Responses received after this time may not be considered.

There are several ways to submit responses: via a feedback form or the interactive map on the project consultation portal (www.stat.northfallsoffshore.com); by email (contact@northfallsoffshore.com), or in writing (FREEPOST NORTH FALLS). Copies of the feedback form will also be available at the consultation events and can be submitted in person.

The above contact details can also be used for any enquiries relating to the documents, plans and maps accompanying this consultation.

Please note that representations received and any accompanying personal data, such as the names of persons over 18, may be made public. If you do not wish personal information to be made public you should state that when submitting your representation. Responses and personal data may be provided to the Secretary of State, the Planning Inspectorate or other relevant statutory authorities in accordance with the requirements of the Planning Act 2008. To find out about how the Applicant will manage your personal data please refer to our Privacy Notice (<https://non-stat.northfallsoffshore.com/privacy/>).

Yours faithfully,


Offshore Consents Manager
North Falls Offshore Wind Farm

