

**INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS  
AND PROCEDURE) REGULATIONS 2009 (APPLICATIONS  
REGULATIONS)**

**THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT  
ASSESSMENT) REGULATIONS 2009 (EIA REGULATIONS)**

**PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER  
FOR AN EXTENSION TO THE OPERATIONAL OFFSHORE WIND FARM  
AT THE WALNEY ROUND 2 SITE BY DONG ENERGY OFF THE ISLE OF  
WALNEY COAST**

**A JOINT CUMBRIA COUNTY COUNCIL, LANCASHIRE COUNTY  
COUNCIL, LANCASTER CITY COUNCIL, COPELAND BOROUGH  
COUNCIL, SOUTH LAKELAND DISTRICT COUNCIL AND LAKE DISTRICT  
NATIONAL PARK AUTHORITY RESPONSE TO THE PRELIMINARY  
ENVIRONMENTAL INFORMATION (PEI)**

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## **1.0 Approach to the Environmental Impact Assessment**

- 1.1 The Preliminary Environmental Information satisfies the requirements at this stage. Considerably more clarity will be needed to better understand the potential impacts and to enable an informed response to the proposals. It is expected that this detail will be provided through the Environmental Impact Assessments.
- 1.2 The document focuses on the approach to the methodology, rather than the provision of information.
- 1.3 An explanation setting out how the preferred options have been arrived at would be beneficial. This is explored in more detail in 2.4 below.
- 1.4 It is not clear whether the maximum capacity of 750MW is a limit imposed by The Crown Estate. Again this point is covered in more detail in 2.5 below.
- 1.5 The PPA authorities have engaged consultants White Young Green to assist with the preparation of the landscape, seascape and ecology aspects of this response.

## **2.0 Project Design Envelope and Project Description**

2.1 The applicant has outlined four scenarios of turbine types and numbers to illustrate how the project might be delivered within the maximum capacity of the project (i.e. 750MW).

2.2 The scenarios comprise:

- Scenario 1: uses 207x 3.6MW turbines to provide a total installed capacity of 745.2MW
- Scenario 2: uses 50x 6MW turbines and 43x 7MW turbines to provide a total installed capacity of 601MW
- Scenario 3: uses 100x 6MW turbines to provide a total installed capacity of 600MW
- Scenario 4: uses 80x 7.5MW turbines to provide a total installed capacity of 600MW

2.3 At this stage, the PEI identifies early on in the process that the likely worst case option is Scenario 1. Subject to the comments in the following sections below, it is considered that the approach taken by the applicant to identifying different options is a sound one as a matter of principle.

2.4 This approach does mean that following a thorough review of the various options and their impacts, a preferred option can then be provisionally identified. A more in depth consideration of the effects of the preferred option can then be undertaken and appropriate mitigation, if relevant and necessary, be considered. This approach is commended as it allows a more robust approach to project development, and could lead to a better outcome both environmentally but also from an electricity generating outcome.

2.5 Notwithstanding that the broad approach appears appropriate at this stage, it is nonetheless not clear from the PEI as to why the project envelope is necessarily restricted to 750MW. In addition, it is not entirely clear as to why the specified four option scenarios are the only ones available, and whether or not other possible combinations might be possible, even though it is understood that an Agreement for Lease for the project has been defined by The Crown Estate (TCE). It is recommended that it would be helpful if the Environmental Impact Assessment explains the background to the four option scenarios, and then to explain the next stages for considering a final preferred option in the light of those preliminary findings and conclusions.

### **3.0 Community Consultation**

- 3.1 The pre-application public consultation events have been carried out with varying degrees of success. Overall there is concern that the events have not reached out to the average person in the community due to the nature of the 'drop in' events and the information provided and the level of involvement by the various representatives acting on behalf of DONG.
- 3.2 The location and timing of the two consultation events held in Copeland in round two failed to maximise the input of the local community and certain communities – St Bees, Haverigg, Seascale and Ravenglass – were not engaged at all. We would seek further consultation with these areas, with particular reference to the communities in Seascale and Ravenglass, given that a key consideration will be visual and landscape/seascape impact from these coastal communities and for people visiting these communities.
- 3.3 Elsewhere at other community consultation events such as at the Barrow Forum, Walney Island, Blackpool and Middleton, it would seem that more positive engagement with the public had taken place. Where the events were larger, such as at the Barrow Forum, there was clearer signage used to indicate the location of the event. Helpful clear information was also made available within the venue containing community newsletters, mini-consultation reports Frequently Asked Questions leaflets, various DVDs, Statement of Community Consultation, display boards and printed material, computer generated visualisations, viewpoints, photomontages and feedback forms. Staff were on hand to provide answers to public questions. At Blackpool, whilst a smaller event was provided and it was adequate for the purposes of informing the general public, there were no computer visualisations or DVDs being played, and the event relied upon maps, pictures and handouts, which could just as easily be found on the web,
- 3.4 In summary, it is suggested that better planning of the events and venues in terms of when and where they were held may have resulted in greater numbers of people attending, which on the whole seemed to be poorly attended.

## **4.0 Off-shore Biological Environment**

- 4.1 The following review has been carried out by WYG Ecology on behalf of the Planning Performance Agreement Authorities. It considers the preliminary appraisal conducted by Dong Energy (Applicant) on the potential impacts of the development.

### Chapter 1.0 - General ecology comment

- 4.2 1.5.2 Port(s) to be used for construction activities and vessels has not yet been decided – it is understood that there is presently potential for ports in Cumbria to be used such as Workington or Barrow, and in Lancashire, such as Fleetwood and Heysham. In this case the direct and indirect onshore impacts and intertidal impacts for these locations would need to be addressed.

### Chapter 3.0 - Environmental Impact Assessment Process

- 4.3 The methodology for the ecological impact assessment seems to have been included in the general EIA methodology rather than following the recommended approach by the Institute of Ecology and Environmental Management (IEEM). It is not clear in all cases how ecological receptors have been valued (ornithology is however well covered in 9.4.5.3, 9.4.7.6 and 9.4.5.2). This needs to take into account the geographic frame of reference (international through to local), with assignment of value to habitats and species, biodiversity etc. using guidance from IEEM. There is also no mention of the 'zone of influence' of the potential effects which would help to delimit the study areas. Characterisation and description of predicted ecological impacts should include whether or not the impact is positive or negative, the magnitude and extent of the impact, duration, reversibility and timing /frequency of the impact together with a confidence level for each predicted impact.
- 4.4 It is generally accepted as Current Best Practice when undertaking ecological impact assessment to make use of the detailed IEEM guidelines which include a document Guidelines for Ecological Impact Assessment in Britain and Ireland IEEM – Marine and Coastal 2010. Although IEEM 2010 is quoted in the text these guidelines do not appear to have been closely followed in this PEI ecology assessments.

### Chapter 9.0 - Offshore Biological Environment

#### 9.1 - Benthic and Intertidal Ecology

- 4.5 9.1.1 - Introductory sentence includes assessment of 'benthic invertebrate communities' but omits coverage of 'intertidal' invertebrate communities and intertidal habitats. Why?
- 4.6 The potential impacts listed do not take account of the more widespread effects which might result during construction such as possible changes

in sediment movement and hence impact on coastal morphology, damage to spawning grounds through noise and vibration, obstruction of migration routes including fish, marine mammals and birds, displacement of SPA birds, damage to coastal habitats such as reefs etc

#### 4.7 Other potential pollution impacts –

- chemical/hydrocarbon pollution during construction arising from concrete, drilling muds, cements, grouts, marine paints, marine fuels and lubricants, coolants, transformer fluids and lubricants, sealed oil filled cable units (6.13). PEI states that containment vessels will be used where stored or used in large quantities – nonetheless this pollution risk needs to be assessed in the PEI and EIA.
- Potential pollution arising from mobilisation of pollutants in the seabed sediment.
- Composition of ballast to be used to infill around turbine bases also needs to be mentioned.

4.8 9.1.3 - Table 9.1 is labelled Table 26. This should include 'vibration' in potential impacts as this produces different effects from noise. More widespread effects on coastal processes has not been considered in terms of coastal habitats – again the zone of influence of effects needs to be clearly defined.

4.9 9.1.4.1 - Objective 2 - metal contamination is considered within and around site (sub-tidal only) – it is not clear why intertidal is not important as well as sub-tidal? Sediment will be disturbed along whole course of export cable corridor and construction activities are likely to result in mobilisation of sediment and contaminants if present over a more widespread area?

4.10 Eastern Irish Sea is historically contaminated – the PEI states that levels of heavy metal recorded were 'as expected for the eastern Irish Sea' – surely this implies they are therefore contaminated? Need to review technical report.

4.11 The baseline information does not include sources of information, data searches etc undertaken. It would be useful to list all references and databases used to collate the background information. Maps showing the designated sites should be included for reference.

#### 9.1.8 - Preliminary Assessment of Potential Impacts

4.12 The benthic community is assessed as being of 'low sensitivity' in terms of the habitat itself but the indirect impacts on for example SPA birds and fish feeding on these areas needs to be assessed. These receptors would be of a higher ecological value.

4.13 Parts of the Marine Conservation Zones West of Walney and Lune and Wyre Estuaries, and OSPAR Biodiversity Priority Habitats (protected

habitats of NE Atlantic) may be directly affected by the windfarm and export cable routes, hence conservation status and integrity of these sites needs to be addressed. There is no clearly defined method of valuing ecological receptors in this PEI as stated above. Construction and operation within a nationally designated site would be expected to consider overall effect on nationally important habitats and the integrity and conservation status of this ecological area. However the areas affected by the windfarm and cable routes are presently assessed in the PEI as being ecological receptors of 'low sensitivity'. A map showing the location of all the designated sites with respect to the project area would be helpful in understanding the potential effects of the scheme.

- 4.14 9.1.11 Mitigation – we would need to see the technical reports before making any comments with regards mitigation or any requirement for compensation.
- 4.15 This offers mitigation for adverse effects of dredging and spoil disposal from the foundation installation through temporary storage before controlled discharge – this does not mitigate or compensate for actual habitat loss and/or disturbance.

## 9.2 - Fish and Shellfish

- 4.16 Please note that WYG have not reviewed this section in detail.
- 4.17 Table 28 - This should also include vibration; disruption to migratory routes.
- 4.18 9.2.2 states that methodology for the assessment will take account of IEEM 2010 but the wording of the impact assessment reverts back to the EIA methodology given in the introduction for the whole ES.
- 4.19 9.2.5 Species of Conservation Interest – this paragraph states that there are no designated SACs for diadromous migratory fish species within or close to the Project area. However the area includes part of the OSPAR site; Solway Firth Marine SAC is to the north – qualifying species include sea and river lamprey.
- 4.20 9.2.7 and 9.2.8 - Vibration is not included.
- 4.21 9.2.7 Assessment of potential impacts is based on low sensitivity receptors in the Project Site – are there not more ecologically valuable receptors including UK BAP and migratory species passing through the study area, including eel, sea and river lamprey, sea trout and salmon, in which case impacts should take account of ecological receptors of greater value.
- 4.22 9.2.9 Cumulative impacts do not list/address potential in-combination effects such as increased obstruction to migratory routes, disturbance to

spawning grounds, increased shipping, pollution risks, loss of foraging habitats, cumulative impact of many cable routes etc

### 9.3 - Marine Mammals

4.23 This section has not been reviewed in detail.

4.24 This section covers 'turtles' as well as marine mammals.

### 9.4 - Offshore Ornithology

4.25 9.4.3 Collision risk assessment needs also to take account of the wind turbines already present in this marine corridor. In addition use made of the Solway Firth Marine site and flight paths taken by SPA birds from elsewhere in UK and Europe during severe winter weather needs to be taken into account. Potential displacement of birds and the resultant effect on the Cumbria SPA bird populations needs to be addressed.

4.26 9.4.7 Technical reports and collision risk modelling results will need to be reviewed to comment on assessment of potential impacts.

4.27 9.4.9 Cumulative Effects – Table 74 in Chapter 16 lists plans to be used for the in-combination assessment but this does not list any onshore windfarms in Cumbria such as Haverigg. These are located closer than the onshore windfarms listed for Lancashire so it is not clear why they have been omitted. Table 75 provides the preliminary assessment of cumulative impacts – again Cumbrian windfarms are not included yet may result in cumulative impacts on ornithology. The cumulative effects of displacement of SPA birds by offshore windfarms may result in changes in the distribution of coastal SPA bird populations in Cumbria. In-combination effects on SPA birds should also address the impacts of intertidal and onshore developments which may affect bird movements and intertidal habitat.

### 9.5 - Intertidal Ornithology

4.28 The effects of the offshore cable route on intertidal ornithology in Lancashire has been addressed in this chapter. Displacement of SPA birds and loss of intertidal habitat could also result in an impact on adjoining SPAs. Assessment should also consider the potential effects of displacement of SPA birds resulting in a knock on effect on suitable intertidal habitat elsewhere. Cumulative impact of developments affecting both offshore and onshore coastal areas in Morecambe Bay and further along the coasts north and south may result in loss of intertidal habitats, foraging, roosting and onshore high tide roosts. Therefore effects are not necessarily only confined to Lancashire.

4.29 Potential impacts on intertidal ornithology as a result of using the ports of Barrow, Workington, Fleetwood or Heysham for the construction phase has not been addressed in the PEI.

## **5.0 On-shore Biological Environment**

- 5.1 The PEI gives an overview of the project, and provides an update on progress towards the production of the Environmental Impact Assessment/Environmental Statement.
- 5.2 In general, the proposed scope and coverage of the EIA seems reasonable but this is an overview document only and, in terms of potential impacts on biodiversity and the acceptability or otherwise of the proposals, there is insufficient detail within the PEI to enable further comment at this stage.
- 5.3 It is understood that the technical reports (not yet available) will include further details of surveys and assessments, together with proposals for mitigation. We will obviously be in a position to provide further comments once these further details are available.
- 5.4 In terms of the PEI, we have the following comments.

### Chapter 4 - Legislative context, consenting and regulatory requirements.

- 5.5 This is not a comprehensive list of relevant legislation or regulatory requirements, presumably this will be addressed in full by the EIA. In addition, there appears to be some confusion with regard to the level of statutory protection afforded to some species (see also section 5.4 Selection Process for Onshore Elements).

### Section 5.5 - Landfall Options.

- 5.6 This sets out three possible options, but then notes that there is the possibility of others being brought forward and of one or more of these options not being advanced. It will be difficult to comment on the acceptability of the proposals without knowing exactly what is being proposed.

### 6.7.2 - Cable routes.

- 5.7 This indicates that additional temporary standing may be required but cannot be identified until cable contractors are appointed. Even so, it might be useful for the EIA to specify where such temporary standing would not be acceptable (i.e. environmentally sensitive receptor).

### 6.9 - New NGET substation.

- 5.8 Details of this will not be available until NGET apply for permission. If there will need to be a Habitat Regulations Assessment (or other in combination/cumulative assessment) then some detail of this will be necessary however.

6.11 - operation and maintenance requirement for office space, warehouse space, parking facilities, harbour facilities, increased traffic.

- 5.9 It isn't clear whether this would all be delivered within existing developed areas, but the EIA will obviously need to consider (amongst other things) potential impacts on biodiversity.

Chapter 12

- 5.10 This states that all surveys were carried out by suitably qualified ecologists. The Environmental Statement should include further details of personnel (names, credentials).
- 5.11 Chapter 12 discusses HDD or open trench methods, and states that with the open trench method there would be associated clearance of vegetation, e.g. woodland throughout the working width. This is referred to as a temporary loss. However, given the length of time required for tree growth/development of woodland, woodland clearance from the 14m permanent width (or 40m working corridor) would not really constitute a temporary loss.

## **6.0 Off-Shore Human Environment**

### Landscape and Seascape Visual Impact Assessment

#### Introduction

#### Scope of Review

- 6.1 The following review considers the preliminary appraisal conducted by Dong Energy (Applicant) on the potential impacts of the development on the offshore, seascape, landscape and visual elements within the context of Cumbria (including the Lake District National Park) and Lancashire.
- 6.2 The subject of review is the Preliminary Environmental Information Report, Version 1 (PEI Report) published by Dong Energy. The review process includes; a desk based exercise to supplement consultee comments on sections 10.4 and 13.3 respectively and observations relating to Appendix: Photomontages. In addition, WYG has provided comments on Chapter 3 Environmental Impact Assessment Process. The review has been supplemented by selected site visits to a representative number of Viewpoints (Ref to Appendix A Draft VP locator sheets & site notes).
- 6.3 The PEI report provides information on the proposed Walney Extension Offshore Wind Farm ('the project) and an initial and provisional assessment of the likely 'significant environmental effects' arising from the construction, operation and decommissioning of the project. The PEI consists; non-technical summary (PEI Non-Technical Summary' or PEI NTS) and the main report. It should be noted that the report refers to 'technical appendices accompany the PEI'. However, these technical appendices are as yet to be released for review and do not therefore support the preliminary assessment within the current report. As such the comments contained within this review relate to the main Report and Appendix: Photomontages.
- 6.4 The following comments are in response to the Seascape, Landscape and Visual Impact Chapters of the report. Given the interdependencies and overarching processes involved in preparing the PEI, WYG has also provided selective comment on the EIA process and assessment methodology, which it considers to benefit the consultees wider review.

#### PEI Review

- 6.5 The following chapters reference the main content of the PEI including issues pertaining to process and methodology outside sections 10.4 and 13.3;

#### 1.4 - The Proposed Offshore Wind Farm Development

##### 1.4.1 - The Project Site and the Site of Associated Development

- 6.6 The PEI states the Project is an extension to that of the operational wind farm at the Walney round 2 site. The extension will occupy an area of up to approximately 149km<sup>2</sup> with a capacity of up to 750MW.
- 6.7 This review recommends that Consultees and Stakeholders be aware that the project includes 'offshore and onshore cable routes and two potential onshore substation location' [sic] which it states are under consideration. Offshore substations also form elements within the defined 'project parameters'. The report details the project parameters and design envelope, options and installation ranges. It states that a new NGET substation will be required to accommodate generation capacity for a number of projects; including connection for the project and that the likely 'significant' environmental effects of the National Grid works have additionally been assessed in the EIA being carried out for the project. The development description also states that a number of offshore cable routes options for the project are being considered.

### 1.5 - Project Overview

- 6.8 The report states that to allow flexibility in the design process, the EIA being carried out is considering a range of options in relation to size, location and methodology for delivery of the project and that the final location of structures and equipment has not been determined. The PEI states that a provisional assessment of environmental impacts across the full parameters of the design envelope has been considered in the PEI.
- 6.9 The PEI confirms a maximum capacity of 750MW, the total number of turbines based on capacities of 3.6 MW and 7.5 MW at the Project would vary between a maximum number of 207 and a minimum number of 80 turbines (this conforms with Table 56 of the PEI where four layout scenarios are defined). The PEI sets out the range of turbine dimensions within its target capacity range i.e. 750MW:
- *A Nacelle (hub) height ranging from 82 to 122 metres;*
  - *Rotor diameters ranging from 120 to 200 metres;*
  - *A maximum blade tip height ranging from 142 to 222 metres;*
  - *Clearance above sea level at mean high water springs (MHWS) of at least 22 metres.*
- 6.10 It is acknowledged that the PEI states which options for the 4 scenarios have been considered 'worst case'. The PEI also states later within the report why the scenarios have been chosen to represent worst case scenario and what criteria is used to define worst case scenario. This is particularly pertinent when the applicant states in section 10.4.2 Methodology, that the valence of effects (positive, neutral or adverse) will not be assessed within the SLVIA. The applicant should therefore state that the worst case scenarios have been considered to be those of

greatest significance and where the anticipated nature of effect is considered 'adverse'.

6.11 The PEI states that all indicative layouts considered to date and presented during the first stage of the Section 47 community consultation events do not represent the final layout of the project, but that indicative layouts and final Project layout will fall within the design envelope assessed in the EIA and described in the PEI.

6.12 Consultees should consider in light of the guidance referred to in 3.2.1 and the Planning Inspectorate *Advice Note 9: Rochdale Envelope*, the apparent wide parameters based approach adopted within the assessment may be subject to some challenge. The advice note acknowledges that some flexibility on the nature of the project description is acceptable, provided that the project has been appropriately consulted on and the parties understand the implications of the flexibility proposed..... and that flexibility in the size, location and methodology for delivery of the project is desirable in order to accommodate an efficient delivery of the project which can take account of technological advancements, infrastructure availability and costs at the time of construction. The PEI states that the EIA is considering the worst likely case scenario i.e. the scenario allowed within the defined envelope of the proposals that have the potential to be constructed and would lead to the 'worst levels of adverse environmental effects'. The PEI acknowledges the likely worst case may vary across different assessments topics or receptors and so each environmental topic has defined the likely worst case or cases relevant to that topic.

6.13 Consultees should be satisfied that they are able to make objective comparison between environmental topics and that the nature of the scenarios being considered as 'worst likely case scenarios' for assessment is transparent.

6.14 Overall it is considered that it would be helpful to see the photomontages for all the scenarios from the closest and most elevated viewpoints. It is hoped that these will be included in the forthcoming technical report and will provide the detail that will help stakeholders to make these objective comparisons.

6.15 3.2.1 - Project Design and the Rochdale Envelope Principle sets out the use of the Rochdale Envelope and the importance that consultees understand the implications of the flexibility proposed. The flexibility should not include parameters that are so wide as to represent effectively different schemes. Section 1.5 states:

*'the Project would vary between a maximum number of 207 turbines based on an indicative layout using 3.6MW wind turbine and a minimum number of 80 turbines based on an indicative layout using a 7.5MW wind turbine'.*

### 3.3 - Scoping of the EIA

6.16 This section of the PEI identifies the process of scoping, the submission of a scoping report and request for a scoping opinion and acknowledges that the activity of scoping will 'continue throughout the preparation of the Environmental Statement so that scope of work can be amended in the light of new issues and new information arising'. The PEI sets out the consenting and authorisation process for certain activities and structures, confirming that as such related development does not form part of the project it will not be included within the scope of the application for DCO. Consultees should note that as stated in section 1.4.1, in relation to the National Grid works, these have additionally been assessed in the EIA being carried out for the project.

### 3.4 - Environmental Impact Assessment (EIA) Methodology

6.17 The applicant states that the PEI and ES will identify whether the predicted effects will be positive or negative. This should be qualified with the phrase 'on a topic by topic basis the PEI and ES will identify whether effects will be positive or negative', as the assessment expressly states this is not possible for Seascape, Landscape & Visual Impacts.

6.18 The assessment methodology recognises accepted practicing norms through reference to DMRB Vol 11 Section 2 Part 5 and IEEM 2011. The corollary stated within the PEI in relation to significance of effect within the DMRB guidance is indeed correct. However, the PEI presents significance criteria and levels within PEI Table 2, which differ to that within DMRB and therefore if this was intentional, it should state for the benefit of the reader and for purposes of supporting a transparent and robust assessment 'as modified for the purposes of the project assessment'. The descriptor also differs with some notable omissions to that within DMRB Table 2.3 again justification should be provided for any divergence from the methodology.

6.19 This section further qualifies that the PEI contains only an interim and provisional assessment to allow stakeholders to understand the likely significant environmental effects of the project. Most notably the PEI states that a worst likely case has been adopted and that the final impact assessment may identify a lower level of impact.

6.20 3.8 - Mitigation – refer to specific comment within Chapters 10 & 13

#### 10.4 - Seascape, Landscape and Visual Impact

6.21 10.4.1 - Reference should be made to the decommissioning phase of the project, if omitted within the assessment an explanation should be provided as to why.

6.22 The PEI states that 17 No assessment viewpoints were agreed with consultees as illustrated on Chart 48 – representative assessment

viewpoints. The PEI would benefit from additional plan detail illustrating the exact location of each viewpoint.

#### 10.4.2 - Methodology

- 6.23 The PEI states that the nature (or valence) of effects (Positive, Neutral or Adverse) will not be established within the SLVIA. It should be noted that The Infrastructure Planning (Environmental Impact Assessment) Regulations (2009) (the 'EIA Regulations') state within Schedule 4 , Part 1 sub-section 20, the following:

*'A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:*

- (a) the existence of the development;*
- (b) the use of natural resources;*
- (c) the emission of pollutants, the creation of nuisances and the elimination of waste, and the description by the applicant of the forecasting methods used to assess the effects on the environment'.*

- 6.24 Table 55 should include a more concise VP description clearly setting out the scope of the chosen viewpoint i.e. 0.5km section of coastal path along sea front etc. It is our understanding that table 55 also contains cumulative VPs. These should be identified within the table to assist the reader in understanding the geographical spread of cumulative viewpoints.

#### 10.4.3 - Measures Incorporated into the Project and Likely Worst-Case Scenario

- 6.25 The PEI states that a review of comparative ZTVs for each of the 4 scenarios together with analysis of wireframes and panoramas using selected viewpoints has been undertaken to define the worst case scenarios. The PEI should therefore confirm which of the selected viewpoints have been assessed, the outcome from that assessment and confirm the availability of the wireframes and panoramas within the technical reports or to confirm that they will form part of the EIA. Without such supporting evidence little comment can be provided as to the credence of the assumptions made, and it is difficult to agree that the worst case scenario is that stated in the PEI, when the supporting evidence for making such an assessment has not yet been released. It would be helpful to see photomontages for all the scenarios, especially for those for the 222m high turbines.
- 6.26 *Table 57* omits reference within the narrative as to the anticipated impact and effect as a result of on-shore construction activity. This may be as a result of the broad nature of the preliminary assessment, however this

should be clarified in future iteration. The PEI should recognise the shared inter-visibility between land and sea, recognising that the land and coastline form components of the seascape. Additional justification should also be provided in support of the nature of the effects and supposition that appears to have been arrived at within the assessment text. This justification could include reference to supporting the wire frames and panoramas which it states previously were used to support the assessment.

6.27 10.4.5 - It has not been possible to appraise the preliminary findings of the assessment, in the absence of the supporting evidence, the preliminary assessments do not conform to the applicants own assessment methodology. However the reviewer generally concurs with the assessor's comments; that scenarios involving the maximum number of turbines will be viewed as lateral expansion of a more concentrated nature across the horizon into the undeveloped seascape to the north-west. However at this preliminary stage it is not possible to state the 'nature of the effect' without a full appraisal.

6.28 The PEI comments that 'the small turbines will present the greatest contrast in scale to the turbines in the foreground of the views'. Whilst this is also a valid comment, the report provided does not contain supporting visual analysis as to the effect of contrast in scale for the benefit of the reader. Similarly viewpoints on the Isle of Man are likely to view the project in the foreground of the view, with Walney 1 & 2, West of Duddon Sands, Ormonde and Barrow forming the backdrop. There are a number of Scheduled Ancient Monuments to the south of Black Combe, which need to be referenced in the PEI, and the impact assessed appropriately.

6.29 The list of onshore wind turbines taken into account (on p. 362) does not include any in the South Copeland area where there is a large number of small wind farms clustered together. The following wind farms should be taken into account: Askham – Far Old Park (7 turbines), Haverigg 2, 3 & 4 (8 turbines), Kirkby Moor (12 turbines) and Harlock Hill (5 turbines). There are two further schemes in the planning system at the moment (five 120m tall turbines at Haverigg and six 100m turbines at Langthwaite, near Millom). A decision on both these schemes has yet to be taken. These are both in the Copeland plan area. There could be additional schemes in the planning system in Barrow and South Lakes as well.

6.30 Further iteration of the PEI should support the assertion that a greater intensification of smaller turbines would have greater visual impact and therefore significance of effect than fewer, taller turbines. A number of key factors come into play when considering visibility; differing scales in the view and overlapping tower, turbine blades and construction types.

6.31 The statement (on page 244) that the SLVIA will consider potential effects on heritage settings within 40km study area, should be supported by identification of cultural heritage receptors within the SLVIA chapter.

These should follow a separate assessment methodology in accordance with Setting of Heritage Assets Guidance and usually contained within the cultural heritage chapter. (Refer to comments contained within the Cultural Heritage review).

- 6.32 The PPA authorities consider it would be helpful to see a plan showing the Regional Seascape units referred to on page 244. Other Seascape Visual Impact Assessment guidance has advocated using smaller units called Local Seascape Units. Is there an argument for using smaller seascape units in order to get a greater level of baseline detail for what is a sensitive landscape area?
- 6.33 This section mentions the visual impact of the offshore substations. These are not visible on the photo montages provided. Is this because they would not be visible from these viewpoints, or has this detail not been superimposed? If the latter, it would be useful for the Council to see the montages with the substations included.
- 6.34 Table 57 mentions night time visual impacts during the construction, operation and decommissioning phases. It would be helpful to see a photo montage from any location showing each of the 4 layout scenarios in the operational phase as there will be a much larger number of aircraft warning lights out to sea than there is currently. Failing this it we would seek clarity on how many additional warning lights there will be i.e. one for each turbine?

#### 10.4.6 - Preliminary Assessment of Likely Worst-case Scenarios of Construction effects

- 6.35 The SLVIA should recognise, the inclusion of land based, temporary construction activity associated with the proposed construction of substations as detailed within the applicants' project parameters.

#### 10.4.7 - Preliminary Assessment of Likely Worst-case Scenarios during Operation

- 6.36 10.4.7.1 - Preliminary findings state that the most significant effects are likely to be experienced by the Duddon Estuary Regional Seascape Unit (RSU), Walney Island RSU and Maughold Head RSU. The PEI states that these RSUs have been assessed as having High to Medium sensitivity to offshore wind development. The reviewer would concur with these preliminary findings and would anticipate seeing further substantiation as to the sensitivity of the respective RSUs within the SLVIA to support the individual character assessments carried out and referenced within other SLVIAs.

- 6.37 It would also be useful to know for each of the 4 scenarios what timeframe would be involved.

#### 10.4.7.3 - Landscape Effects

6.38 A number of the proposed VPs represent landscapes and settings where views form important elements and are emphasised by the relationship with the sea. As an example; VP 4 - Ravenglass is understood to represent the view from residential and commercial hotelier properties along Main St and the amenity green space along the frontage to the estuary. The nature of the view from this location draws significantly from the convergence of the mouth of the river, framing the view out to sea within a setting of traditional cottages and cultural references. The impact and significance of effect of the project on feature 'framed' views and interaction with the seascape character, should be included.

6.39 Future PEI iterations should include more detail as to the VP locations. Currently only X and Y coordinates are provided to the reader accompanied by Chart 48. The VPs are almost indistinguishable from the background mapping detail at this plan scale and graphical representation. Table 55 should also provide a more comprehensive VP description to allow the reader to fully understand the representative nature of the view point and the receptor type.

6.40 There is reference (at the end of para 10.4.7.3) to more scattered onshore wind farms. The wind farms around the Duddon Estuary are not very scattered and do all contribute to a cumulative effect viewed from the South Copeland viewpoints and particularly from the top of Black Combe in the National Park. The same impact can be felt on top of the foothills to the south of Black Combe (although there is no assessment viewpoint in this area). It is agreed that this landscape/seascape has already been altered by the presence of the operating wind farms in the vicinity and to some degree the Walney Extension will be hidden behind those that are already in place, but the cumulative impact that will be felt when viewing the area from more elevated locations may be significant. Therefore mitigation through design and layout will be very important.

6.41 10.4.7.4 - The nature and sensitivity of the viewpoint receptors should be supported by reference to the methodology used for determining sensitivity. The preliminary findings referred to within the PEI, generally follow the premise of impact magnitude being greater for those VPs that are located closest to the development (within 25km) and VPs of an elevated nature.

6.42 Future iteration of the PEI should also clarify for the benefit of the reader that the location used for the 4 x no. photomontages differ in some cases to the location coordinates stated in the viewpoints assessment table 55.

#### 10.4.9 - Preliminary Assessment of Cumulative Impact

6.43 The PEI acknowledges there is potential for significant negative cumulative effects on seascape and landscape. At this stage, the assessment to support such findings is as yet to be made available.

6.44 As mentioned in 6.29 and 6.40 above, there is a cluster of onshore wind farms around the Duddon estuary. Para 10.4.9 of the PEI states that cumulative impacts are most likely to arise from offshore wind farm development in the Irish Sea. It is hoped that the work that led to this conclusion is laid out in the technical report, as the PPA authorities consider that there could be cumulative effects with onshore wind farms in the Duddon Estuary/Haverigg areas. More detailed comments will be made in response to the release of the technical report.

#### 10.4.10 Inter-relationships

6.45 The Council welcomes the acknowledgement in table 73 of the relationship between visual impact and archaeology and cultural heritage aspects. There are a number of scheduled ancient monuments (SAMs) in the south Copeland area e.g. standing stones, stone circles etc. in the foothills to the south of Black Combe. These elevated positions allow a very clear view of the sea and the fells and one could presume that this is why these monuments were placed here. As to whether the impact on these valued assets is negative or positive will be down to the views of the individual visiting these sites. However, there is an arguably significant impact on these SAMs.

#### 10.4.11 - Mitigation

6.46 Particular attention should also be paid to the construction type of the turbines, as the existing baseline seascape clearly exhibits differing construction types and as a result the impact magnitude is seen to differ between different construction types, notwithstanding their scale and size. Future iteration of the PEI should also make reference to onshore mitigation associated with the sub-station development, which forms part of the scheme parameters set out by the applicant to be considered within the assessment.

6.47 It is reiterated that there is no information relating to a comparative land based cumulative impact assessment of existing wind farms and individual turbines on land opposite the proposed site – taking into account for example existing wind farms in South Lakeland and Haverigg 1 & 2, as viewed from the Millom / Haverigg areas, the proposed Haverigg Extension and Langthwaite Windfarms. In addition a number of individual turbines have recently been erected / approved on the coastal plain south of St Bees (ie. Fairladies, Whangs, Bailey Ground, Seascale, and current appeals pending relating to Drigg Moorside and Yeorton Hall etc..) The Council would request that an extended and updated SLVIA be undertaken to take potential 360 degree impact of these ones further north / northwest into account.

#### Chapter 16 – Cumulative and In-combination effects

6.48 16.1 - The PEI does not set out the approach to assessment of cumulative effect on the chosen 4x No. cumulative viewpoints to arrive at

the preliminary assessments. The assessment should recognise the nature of the view; simultaneous, successive or sequential and as such using the agreed methodology of assessment, identify and assess the magnitude and nature of effect on the cumulative viewpoints.

6.49 We consider that the current cumulative viewpoints identified within Chart 48 of the PEI require further substantiation in light of the presence of known additional onshore wind farms in close proximity and assumed cumulative ZTV, which have not been identified in Table 74. These may include for example: Askam, Kirkby Moor, Haverigg II & III, HMP Haverigg, Beck Farm and Langthwaite Fell.

6.50 As an example when standing at the public car park in Askam in Furness, coordinates for (VP 08) refer, the viewer experiences both simultaneous and successive views of existing onshore wind farms, including Askam, Haverigg II & III, the proposed HMP Haverigg wind farm, existing Kirkby Moor, Walney 1 & 2 and the proposed Walney Extension. Chapter 16 provides no supporting evidence to substantiate as to how the assessor has arrived at the 'potential for significant cumulative impact' on seascape, landscape and visual receptors.

#### Appendix: Photomontages

6.51 The baseline photography used for the montages appears to follow current guidance within the landscape Institutes Advice Note 01/11 Photography and Photomontage in landscape and visual impact assessment.

6.52 The montages appear to have been taken in representative climatic conditions, albeit distance and atmosphere from viewpoint 5 is not ideal. The viewpoint information would benefit from an accompanying master reference plan, identifying the location of the 4 photomontage locations so as to assist the reader understand the geographical distribution and distance from the site. The body text should also include clarification that the montage locations intentionally differ to the published coordinates for the VP locations. It should also be noted that there may be differences in the composition of the view between the VP assessment and montage.

#### Summary Points of commendation:

- Overall strategy of using parameters based approach and identification of 'worst case' per topic.
- Use/reference to EIA guidelines etc.
- Approach to consultation.

- Recognition and description of related project elements which while not forming part of DCO are provided and will be discussed in the EIA with expected environmental effects provided.
- Correctly recognising the limitation in design resolve within the project parameters.

## 7.0 On-shore Human Environment - Landscape and Visual Impact Assessment

### Section 13.2 - Landscape and Visual Resources

#### 13.2.2 - Methodology

- 7.1 The commitment to undertake a residential amenity assessment is particularly welcome.
- 7.2 The four stage assessment methodology does not refer to mitigation of impacts.

#### 13.2.3.1 - Definition of the Worst-case

- 7.3 Landscape heritage receptors are not referred to and impacts of the proposals on them appear not to have been considered by DONG's Landscape Architects. There is certainly no reference in the PEI Report to any joint working between Landscape Architects and the team that undertook the archaeology and cultural heritage assessment of the proposed scheme. Presumably consideration of impacts of the proposals on the setting and character of historic designed landscapes, Conservation Areas and listed buildings will receive the input of the applicant's Landscape Architects? In section 13.2.9 Inter-relationship, reference is made to Table 73 which shows potential inter-relationships between different parameters but surprisingly, landscape and cultural heritage are not seen as having a connection (no explanation is provided to explain this). In my opinion, a relationship between these two is *essential* as Landscape Architects can make an important contribution to the assessment of the proposals impacts on the setting and character of heritage assets.
- 7.4 Table 66 Identified impacts and envelope of worst case scenarios for landscape and visual impacts does not refer to effects on landscape tranquillity, landscape heritage assets and views from roads (which admittedly have lower sensitivity than other receptors such as residents and footpath users).

#### 13.2.6.2 - Preliminary Assessment of the Likely Worst-case Scenarios of Construction Effects

- 7.5 Section 13.2.5 Preliminary Assessment of Potential Impacts confirms that *"This section sets out a preliminary assessment of the potential impacts on landscape and visual resources based on the current status of that work"*. This explains why in the third paragraph of section 13.2.6.2 a preliminary judgement of the proposals likely visual impacts during the construction stage is provided: *"However as indicated above, preliminary assessment is that the significance of these impacts will not exceed minor adverse"*. By contrast, the preceding section – 13.2.6.1 – which

looks at landscape impacts during the construction stage does not offer any preliminary judgement on the significance of likely impacts. This inconsistency needs to be addressed.

#### 13.2.7.1 - Landscape Effects

- 7.6 It is essential that the impact of the direct loss of mosslands and associated landscape fabric (approximately 3 ha) as a result of the proposed substation is assessed not just detailed considerations relating to building/structures heights, colours, orientation as proposed.
- 7.7 There is some inconsistency regarding the maximum height of structures within the proposed substation. Section 13.2.7.1 of the Landscape and Visual Resources assessment confirms that *"the tallest structures are likely to be up to 19m high"*. By comparison, the tallest structure identified in Table 66 is the Switch House which would have a max height 14.6m.

#### 13.2.10 - Preliminary Assessment of Cumulative Effects

- 7.8 This section refers to Table 76 which provides information on other developments that the project could have cumulative impacts with. However Table 76 does not include Heysham Nuclear Power Station or proposed infrastructure associated with the North West Coastal Connections scheme.

#### 13.2.11 - Mitigation

- 7.9 This section advises that *"Mitigation is mostly likely to take the form of screen planting and earth works"*. This approach may not be entirely appropriate as the substation sites are in a *Mosslands* Landscape Character Type. Mosslands are characterised, inter alia, by very low levels of tree cover and an essentially flat topography. In such a landscape, relatively large scale earthworks and tree planting can be wholly inappropriate, particularly if they are situated away from areas where there is established tree cover or elevated topography. Clearly then, it cannot be assumed that this form of mitigation will be available as a viable option and it may be that compensation for landscape losses will have to be explored.
- 7.10 In the north-west, compensation of landscape losses is still a material consideration due to the requirements of RSS Policy EM1 which has 'no net loss' of assets as a key policy test. Despite this, the issue of compensation for the loss of 3 ha of open countryside that would occur as a consequence of the proposals is not addressed in the section on mitigation (13.2.11 or the rest of Section 13.2). Whether boundary screen planting (even if that is appropriate for the landscape character) could be deemed appropriate compensation cannot be determined at this stage of

the project. I trust that the developer will give due consideration to this compensation issue as the scheme proposals are developed further.

7.11 Table 67: Viewpoint for substation LVIA.

7.12 Coordinates for the viewpoints should have been provided.

## Section 5. Site Selection and Alternatives

### 5.4 - Selection Process for Onshore Elements.

7.13 The selection process is presented in outline only. It would have been particularly useful to have had information on the way selection criteria were used to eliminate options.

### 5.6 - Onshore Export Cable

7.14 This section advises *"All cables to and from the onshore substation that are associated with this Project application are to be buried (no additional overhead cables are required for work being carried out by DONG Energy). Onshore cable will be mainly installed in trenches. However, Horizontal Directional Drilling (HDD) may be necessary to pass large structures such as sea walls, dykes and rivers."* Where the proposed cable route crosses ditches – a key characteristic of the landscape – would HDD be used? The use of urbanising piped cable crossings in ditches should be avoided.

## Conclusion

7.15 With the exception of the issues identified above, the PEI which is only an interim preliminary assessment is considered to adequately addresses landscape and visual issues pertaining to the substation and onshore cabling elements of the proposed Walney Extension Offshore Wind Farm.

## 8.0 On-shore Human Environment - Marine Archaeology and Cultural Heritage

- 8.1 A rapid assessment has been carried out of Section 13.3 concerning archaeology and cultural heritage contained in the document entitled "Preliminary Environmental Information Report - August 2012" by DONG Energy (the PEI report).
- 8.2 Whilst the approach set out within the section and the data presented appears to show that a reasonable approach to assessing the baseline data and the potential impact of the cables and substation was intended, there may well be ways in which practice falls short of the standards quoted and needs to be improved. For instance the list of sources given in section 13.3.2 omits any reference to books, journals, maps and other documents, published or unpublished but available to be consulted in libraries etc. and which are noted in the relevant IfA standard. It is also notable that section 13.3.2 states:

*" ...The FRS [Field Reconnaissance Survey] considered a corridor of approximately 50m either side of each of the cable route options. The fieldwork provided further information on areas of known archaeological features highlighted by the DBA [Desk Based Assessment], as well as identifying potential new sites on or close to the cable routes. ..."*

whereas both sections 13.3.4.1 and 13.3.4.2 state:

*"...No above or below ground signatures of known gazetteer sites in the FRS survey corridor were observed, and no new sites were added to the gazetteer as a result of the FRS...."*

- 8.3 It is acknowledged that these issues may reside in the translation of the technical studies and reports produced into the summary provided by the PEI report.
- 8.4 It is not possible to make any further useful comment on the sensitivity or significance of the sites identified within sections 13.3.4.1 and 13.3.4.2, or on the impact assessments, mitigation, etc. mentioned in sections 13.3.4 – 13.3.11 as insufficient detail is given within the PEI.

## **9.0 On-shore Human Environment - Traffic and Transport**

9.1 With regards Traffic and Transport, the PEI focuses on the proposed onshore works associated with the proposed substation and cable route near Heysham. As the proposed works do not impact the Cumbrian highway network, this is a matter for Lancashire County Council as the local Highway Authority to consider.

9.2 It should be noted that the proposed development has the potential to have a significant impact on the highway transportation network should Barrow-in-Furness, Workington, Fleetwood or Heysham be selected as the construction port and/or Operation & Maintenance base. Currently there are too many variables and unknowns in order to provide any meaningful comments. However, should one of these ports be selected, the relevant authority would welcome early engagement and discussions with the developer on the following:-

- Early sharing of information on turbine choices, their characteristics, chosen construction method and information on aggregate / bulk material sources and quantities, origin and likely transport mode to the construction port.
- Transport Assessment - A transport-assessment-based approach to the investigation, understanding and mitigation of transport impacts will allow a rigorous and transparent process which demonstrates whether the proposals can be accommodated by the existing highway infrastructure, and if not, why and where mitigation measures such as highway improvements are required. If Workington or Barrow Ports is selected, the Transport Assessment should therefore consider opportunities to utilise non-road based transport such as the Cumbria Coast Railway line which provides a link from the West Coast Main Line, to the Port of Workington and Barrow Docks (as well as from key settlements including Carlisle, Maryport, Workington, Whitehaven, Millom and Barrow). Such an approach will provide clarity for the determining authority during examination and decision-making. Similarly, if Heysham or Fleetwood is selected, the Transport Assessment should consider non-road based opportunities.
- There is an operational requirement for over 6,000 helicopter flights per annum. The potential impact of this transport operation, particularly in terms of noise impact, will need to be addressed.
- Travel Plan - Travel planning will be a vital element in reducing travel-to-work impacts to / from the construction port and operations & maintenance base and will help to achieve the optimum use of existing infrastructure.

9.3 The Transport Assessment and Travel Plan for the proposals should be informed utilising the local Highway Authority's own transport models in

order to reduce the likelihood of discrepancies between base data and thereby aiding the approval process.

## **10.0 On-shore Human Environment - Noise and Vibration**

- 10.1 As yet we do not know the form of construction of the turbines, the place of manufacture, or whether the ports of Workington, Barrow, Fleetwood or Heysham will be used for construction or operational activities. All of the above will have a bearing on noise during and after construction.
- 10.2 In addition to construction noise, consideration should also be given to transport related noise from vehicle, vessel and helicopter movements.
- 10.3 It was noticed during the earlier Walney Island phases the piling operations were heard inland on a clear still day but until we get the full technical details we cannot be certain of the potential impacts.
- 10.4 Further comments on the effects of the development will be made in response to the publication of the technical reports. It is noted that the onshore connections will be located in Lancashire.

## 11.0 Socio-Economics

11.1 It is recognised that the methodology by which the technical studies (which will form the basis of the emerging conclusions of the EIA) is not available for comment. It has therefore only been possible to make some preliminary, high level comments.

### Economy – Jobs and skills

11.2 It is noted that DONG are undertaking a study of the economic impacts of previous wind farm projects (Walney I and II and West of Duddon Sands). DONG advise that the analysis would not be specific to this project and the EIA, but will provide a good overview and breakdown of the economic impacts that could be expected.

11.3 Whilst it is welcomed that such a study is being undertaken, it would be more beneficial if the analysis of the information to inform this study is applied more specifically to this project. This would provide a more detailed analysis to inform the potential impacts of the project. It would be constructive if within this, consideration was given to the projected number of jobs, skills requirements, how they will advertise and support local people to access relevant jobs, how many apprentices they will employ and in what professions etc, how they will engage and foster the local supply chain, what types of materials/services will they need to procure, what is the percentage aim of procurement activity that will be directed to local suppliers etc. It is hoped that the development will bring sustainable employment benefits to the local area. The joint Authorities would be happy to share our experience of delivering apprenticeship schemes.

11.4 To assess the socio-economic impacts of the development it may be useful to establish a series of baseline indicators, for example, the number of people currently employed in the wind energy sector, the number and type of local services currently available, the current annual number of visitors and visitor spend. The indicators could then be used to measure the long term impact of the development.

11.5 It is recognised that no decision has been made in respect of which port could be used during the construction and operation of the offshore wind farm. However consideration should be given to the potential of the capacity and capability of Barrow, Fleetwood, Heysham and Workington Ports and how their use could influence the analysis of the impact on the local economy.

11.6 Where appropriate we request that the study takes into account the impact on the local and regional tourism industry. We encourage reference to independent research on this topic.

11.7 We would welcome further clarification as to how the recreational and tourist baseline was set. The report identifies recreational and tourist

facilities within the study area including those with views of the extension from Barrow in Furness and Walney. We think the study should include South and West Cumbria. If the development potentially has a cumulative visual impact as far as St. Bees as indicated in Chart 48, the EA should take into account the impact on all recreational and tourist facilities within the zone of visibility, which includes those viewpoints identified in table 55, and those communities where the impact will be greater around Millom, Haverigg, Silecroft, Black Combe and up to Seascale and Ravenglass. These settlements should be referred to in the document. Tourism and in particular eco-tourism is a key element of the strategy for increasing visitor numbers to this outstanding coastline and the impact of the turbines on this aspiration should not be underestimated. The chapter states that no national cycle routes or national trails are crossed by the proposed cable routes or substation sites. However consideration should be given to future development of the England Coastal Path.

- 11.8 We would like further clarification of what impact the development will have on Copeland's communities during the construction, operation and decommissioning phases. We also seek clarification on what is referred to as 'locations along the nearby coastline'. Where negative impacts cannot be addressed through physical mitigation, we would expect communities to be compensated through other means.
- 11.9 The authorities would like the development to show how it can promote a comprehensive and integrated programme of intervention to improve the opportunities for employment creation to help promote lasting and positive skills beyond the construction period to deliver long term sustainable employment benefit to the area. Cumbria County Council and Lancashire County Council would be willing to help in developing, in consultation with the developer, an employment brokerage scheme to enable DONG to use local workforce and apprenticeship opportunities. This would ensure that local residents are supported to access to employment and training opportunities
- 11.10 Timely work should also be considered to assess the foundations for a local supply chain at the earliest opportunity – ensuring local businesses have equal access to opportunities and are able to prepare for their input into projects. The PPA authorities have worked with a number of major employers to develop Supply Chain Frameworks that set out the methodology for engaging with local suppliers as well as the support local authorities and other key partners can provide. The authorities would be happy to replicate this work for this development.

#### Community Impact (Community Impact Mitigation)

- 11.11 It is considered that there needs to be a more defined analysis of the interrelationship of topic based matters and the effect on the community arising from the development of an offshore windfarm, particularly in relation to the cumulative visual impact and the potential impact on

tourist assets. This should also take into account the effect on the community in terms of the perception of the cumulative impact of offshore wind farms being located within the area.

11.12 Further work is necessary to more clearly quantify what the development's impact will be on the local community. If it found that the development demonstrates a quantifiable impact then it would be appropriate to request some compensatory measures in recognition of the potential impacts on the quality of life and community well being of local communities which may not be addressed by other mitigation. The contribution should be commensurate with the level of impact or harm on local communities, taking into the nature of the impacts on the quality of life, the number of people affected, the length of the project and account of its construction and operation.

### Contribution to the Communities

11.13 Community Benefit Contributions (CBC) are contributions from a developer to communities for hosting developments that deliver national benefits. CBC are payments to a community in recognition for hosting a development that delivers national benefits, whilst imposing particular consequences upon the host community. CBC is in addition to the actions and contributions that are necessary to make a development acceptable in planning terms. It is voluntary, and may be in addition to, and 'above and beyond' any Section 106 agreement, Community Infrastructure Levy (CIL) payment or Community Impact Mitigation (CIM) fund agreed between the developer and host communities.

11.14 The concept of Community Benefit Contribution is common in other parts of the UK in relation to renewable energy developments, particularly in relation to wind farm developments. It is considered appropriate that a request is made in respect of the proposed development as it is considered to be in the national interest.

11.15 The authorities would welcome discussion with DONG to explore the potential for a CBC package and how such a package could be quantified.

11.16 If a CBC package is agreed, consideration will need to be given to the appropriate vehicle for over-seeing the programme of Community Benefit Contribution funded projects. This could be via establishing a community fund and/or the local authorities overseeing the collection and allocation of the CBC fund.

## 12.0 Conclusions

- 12.1 Whilst the general approach taken in the PEI is broadly acceptable, it is considered that overall a significant level of additional work is necessary to be carried out by the applicant to clarify the likely significance of effect and impact of the project on known receptors and communities, as set out in the themed topics identified above.
- 12.2 The difficulty in appraising the PEI is due to insufficient evidence provided to substantiate the assumptions made within the report, further complicated by the uncertainty around what form the development will take. Further dialogue will be required with the developer to clarify and resolve these issues as part of the pre-application process.
- 12.3 The impact from a highways and transportation perspective is not adequately covered, which is understood to be due to the uncertainty around the design and delivery of the project. However it does cause difficulties in appraising the potential impacts and identifying mitigation and employment opportunities associated with the development.
- 12.4 Furthermore, the lack of clarity also leads to uncertainty relating to the community benefits that could be generated from the project. Community benefits can take many forms including the potential employment opportunities or financial incentives. Further emphasis needs to be given to the extent and nature of community benefits DONG Energy anticipate will be created by the development.
- 12.5 It is considered that the consultation and engagement undertaken in the Copeland area was lacking in contrast to engagement elsewhere. It is recommended that further consultation is necessary in the coastal communities given the potential concerns regarding the potential visual and landscape impacts from the coastal communities identified.