

Public Consultation response - Interim statement

We have received a large number of public representations to the White Cross Offshore Windfarm onshore planning application. As a result of the high level of engagement with the project we have developed this interim response to the comments.

The application documentation is very long and detailed to ensure that all potential impacts of the development are fully investigated. We are aware however that this level of detail may make it challenging to identify the relevant information to your particular topic of interest. Therefore, this interim response aims to highlight the key themes that are arising in the representations and summarise the information presented in the application on these matters.

1. Preferred onshore cable route

The onshore cable route identification process is outlined in Chapter 4 Site Selection and Assessment of Alternatives of the onshore application. This process follows a comprehensive and detailed cable route identification study and subsequent cable route refinement exercise. The cable route must provide a connection between the windfarm array area identified by The Crown Estate and the electricity grid connection point identified by National Grid, which for White Cross is East Yelland. The cable route assessment process balances environmental, technical and commercial aspects and the decisions made have been based on stakeholder consultation feedback.

Over 20 different onshore cable routes have been assessed along a significant length of the highly designated North Devon Coast. Some of these routes were ruled out for a variety of reasons including engineering risks, significant access issues due to the constrained local road network, presence of large residential areas and the need to reduce as much as possible direct impacts on environmentally designated areas.

The selected cable route avoids significant residential areas and mitigates the potential impacts to the Braunton Burrows SAC by using a trenchless technique to install the cable underground without disturbing the surface. The remainder of the route will travel outside of the SAC and other identified SSSI's towards the Taw Estuary.

A full archaeological trial trenching campaign has been completed along the length of the cable route to identify any features of interest, and to inform any micro-siting requirements around any finds as necessary. No archaeology of interest has been identified within our cable corridor, and targeted features were appropriately investigated and recorded. Any further mitigation, such as watching briefs or targeted excavation in advance of construction, will be agreed with the Devon County Council archaeological advisor and Historic England.

Although a route up the Taw Torridge Estuary may appear to be a better solution this has been investigated by the project and is not a viable route for several reasons. These include;

- The estuary itself is protected as a Site of Special Scientific Interest, a Marine Conservation Zone (below mean high water springs) and is also designated as a Shellfish Water Protected Area.
- Laying the cable on the surface of the estuary bed would result in significant navigational health and safety issues.
- Due to the dynamic nature of the Taw Torridge estuary and the geomorphology the cable would need to be buried very deep within the estuary bed to avoid it becoming exposed. This would cause a significant level of damage to the estuary and have knock on effects for the geomorphology of the wider area.
- Drilling / boring under the estuary bed from outside the estuary to the substation would not be technically possible.

2. Environmental impact of cabling

A full Environmental Impact Assessment has been undertaken. This encompasses all protected species and habitats, and the resultant Environmental Statement sets out all of the potential impacts associated with the project as well as the measures that will be implemented to mitigate those impacts. These potential impacts are temporary during construction and once construction is complete the cable route will be reinstated to the condition it was found in before construction. The chapter of primary interest for this topic is Chapter 16 Onshore Ecology and Ornithology.

The selected route avoids the Braunton Burrow SAC (by drilling underneath the surface), Braunton Swanpool SSSI and Greenaways and Freshmarsh SSSI. The route does go through Braunton Marsh which although is not a designated or protected site, represents an important habitat type. Installing the cable route through the marsh has the potential to cause some temporary environmental impacts, the effects of which will be continuously monitored throughout the construction phase with mitigation measures applied as appropriate. For example, the use of trenchless construction techniques to install the cable in some areas, use of floating road, bailey bridge or other techniques to reduce areas of topsoil stripping.

Potential impact on the wintering birds associated with the estuary has been considered in detail as part of the assessment process. There is the potential for temporary disturbance during construction as it is not possible to completely avoid the area during the wintering period due to the length of the construction program. However, work will be scheduled wherever possible to avoid this time. Screening will also be in place to minimise the potential for disturbance and additional mitigation is also being considered, such as establishing alternative nearby roosting locations. The birds that use this area are already accustomed to disturbance due to the activities that regularly take place in this location.

Following the completion of the construction works all areas along the cable route will be reinstated, and there will be no permanent above ground infrastructure visible. This reinstatement will take place as soon as possible after the construction, and it has been assumed that all habitats will be reinstated no more than 2 years after the start of construction. It is not possible to state how long it will take for the reinstated habitats to become fully established back to their original condition, and this will vary significantly between habitat types. To ensure that there is no reduction in quantity or quality of habitat types we are working to develop BNG projects for all land along the cable route that will be directly impacted by the Project.

Monitoring of re-established habitats will be conducted during this period, and if necessary remedial action will be taken to ensure that the habitats are restored to the desired condition. The figure of 15 years for mitigation to become established relates specifically to planting and screening around the proposed onshore substation, which will consist of native deciduous woodland species which will take up to 15 years to become fully established.

In addition to reinstatement, the Project has committed to delivering 10% Biodiversity Net Gain. We will be working directly with the North Devon UNESCO biosphere reserve and will be using their Natural Capital Marketplace to deliver our BNG commitment. This will ensure that the environmental measures incorporated by the project deliver against the specific habitats and species that may be impacted through the project and are also compatible with the local area and priorities.

White Cross have been working closely with the World Surf Reserve (WSR) and their Stewardship Council to ensure that the turbines will not have an adverse impact on the local wave resource. A wave modelling study (see offshore application, Chapter 8, Appendix 8.A) has been undertaken to the specification of the WSR which shows there will be negligible impact on wave conditions that would be immeasurable from the natural variation. We will continue to engage with the WSR as the project design develops.

3. Traffic and Transport

An increase in traffic associated with the project is something that we have identified as a potentially significant impact. Therefore, mitigations have already been built into the project design to minimise the number of vehicles required and we have committed to a project Construction Traffic Management Plan.

The value of 91 HGV's per day is the worst-case scenario for 1 month of the project when materials are planned to be delivered to site in bulk to reduce the number of HGV trips required throughout the project. The average worst-case scenario throughout the project is for 43 HGV trips per day equivalent to approximately two arrivals and two departures an hour, this is on the B3233 through Yelland. For the B3231 and A361 through Braunton the average worst-case scenario is 36 HGV movements per day. These vehicle movements are proposed to take place between 7am and 7pm Monday to Friday and 7am to 1pm on Saturdays.

The references in the application to 24hour working are limited to 14 days of 24hour work per drilling activity, if this is required.

The onshore construction work will be carried out over a maximum of 2 years. This work will be staggered along the cable route and substation location to mitigate prolonged activities taking place over prolonged periods of time.

As part of the Construction Traffic Management Plan several mitigation measures will be implemented which will include but are not limited to:

- Deliveries will be staggered throughout the day
- Traffic movements will avoid peak traffic times
- A series of measures will be used to minimise HGVs including stockpiling materials and optimising HGV size

- A community liaison officer will be appointed to act as first point on contact for communities
- All vehicles associated with the project will be required to display an identification notice in the window

The above measures will also mitigate construction traffic noise associated with the project.

The air quality within the Braunton Air Quality Management Area is generally good and has been consistently below the air quality objective since at least 2017. Only one road utilised by the project passes through the AQMA and the movements associated with the project slightly exceed the vehicle numbers identified in the screening criteria. Through discussions with the Environmental Health Officer it was agreed that this slight exceedance, of a temporary and short term nature, did not require a detailed assessment as it would not result in a significant impact.

The risk of impacts to human health from both dust and non-road mobile machinery during construction are considered as not significant where all industry standard mitigation measures are put in place which will be detailed in the Construction Environmental Management Plan developed post-consent.

4. Flood Risk

Much of the cable route does travel through areas of flood risk in relation to Braunton Marsh and Instow Barton Marsh. This presents a flood risk only during the construction phase and this is primarily faced by those working on the project.

As standard a full Construction Environmental Management Plan will be in place ahead of the commencement of construction which will include all mitigation measures, agreed by relevant statutory consultees and regulators, to reduce and manage flood risk. Some measures have already been built into the design including the working width which will allow space to accommodate any necessary mitigation measures such as silt traps or de-watering requirements. De-watering will be conducted into existing drainage systems and these locations have been identified. Vegetation removal will be minimised and any stockpiles will be appropriately covered.

The new White Cross onshore substation will be situated in a flood risk zone. The substation has been designed for these conditions incorporating a raised platform and drainage strategy which will incorporate water attenuation.

5. Saunton Car Park

Saunton Car Park will not be closed, or access to the beach restricted, at any point as a result of the project.

It is proposed that the construction compound for the drilling works is located in the car park. This will utilise a maximum of 40% of the available parking spaces furthest from the beach for approximately 5 months. After these 5 months once a proportion of the work is complete, approximately a quarter of this space will be returned for use as car parking. The remaining 30% of the carpark will be required for the remaining 7 months of the planned construction. This is a worst-case scenario.

Mobilisation of large equipment will be undertaken outside of the summer holiday high

season to minimise the impact and any workers vehicles required during the construction will be housed in the construction compound.

The project has engaged with the businesses owners situated within the carpark and discussions are ongoing to understand the potential level of impact that the project could have on these businesses. We are aware of the high level of usage at Saunton Car Park and are currently investigating further mitigation measures.

6. Tourism and Socio-economic impacts

Due to the short-term and temporary nature of the onshore construction of the cable route our assessment shows no significant impact to the tourism economy. However, we recognise that due to the location of the construction compound in the Saunton car park there is the potential for temporary impacts specifically associated with this location. As stated above engagement has commenced and is ongoing with the business owners situated within the car park.

7. Compulsory Purchase Order

White Cross Offshore Windfarm Limited are holders of an electricity generation licence under the Electricity Act 1989 ("1989 Act"). Schedule 3, Part 1 of the 1989 Act states that the Secretary of State may authorise a licence holder to compulsorily purchase any land required which is connected to the purpose of this licence (in this instance, electricity generation). The land which White Cross are seeking to acquire is directly related to the White Cross Offshore Windfarm project, therefore compulsory acquisition of this land (or rights over the land) is permitted by the 1989 Act.

The Project is seeking to acquire rights install, construct, and operate the cables, and though their Land Agents, are engaging closely with all parties with an interest in the land over which the Project is seeking to acquire rights, in order to reach voluntary agreements. Compulsory acquisition powers are intended to be used as a last resort and effort will be made to acquire rights voluntarily wherever possible. Should it not be possible to reach a voluntary agreement with all parties, the Project needs to retain the option of using compulsory acquisition to secure the required rights in order to deliver the Project. The Project is not seeking to acquire the freehold title to any land for the cable route.

8. Planning Officer

The White Cross Project has entered into a Planning Performance Agreement with the Council to enable North Devon Council (NDC) Planning Authority to meet their statutory obligations in determining the application. A number of measures are delivered through this agreement including the provision of a planning officer who is employed by the council to work on the application. This is a relatively common approach between large development projects such as this and Local Planning Authorities to ensure that the necessary resources are available to determine applications.

The planning officer has been appointed independently by NDC with no input from the Project. The planning officer is impartial and will deliver a decision based on their expert knowledge and experience and the application documentation provided. The planning officer is very experienced in large and complex applications such as this.