

Mynydd Pencarreg Wind Turbines

Design and Access Statement

March 2021



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Preface

Context

This Design and Access Statement has been prepared by Energiekontor UK Ltd ("EK") to accompany a planning application for the construction, 25 year operation and subsequent decommissioning of two wind turbines, each up to 125m in height to blade tip, including associated development (the "Proposed Development") on land 2km north of the village of Rhydcymerau (the "Site").

This Design and Access Statement explains the design principles and concepts that have informed the Proposed Development (as described in chapter 3 of the Environmental Report) and how transport and access issues have been considered.

The Applicant

Energiekontor UK Ltd (EK) is a renewable energy development company with offices in Glasgow, Edinburgh and Leeds. The company was formed in 1999 and develops small to medium-sized onshore wind and solar farms throughout the United Kingdom. The company operates eight existing wind farms in the UK with consents for a further six projects, four of which are in Scotland. EK also has a number of other wind and solar projects at various stages of the development process throughout the UK.

Energiekontor UK Ltd is part of the Energiekontor Group. The parent company, Energiekontor AG, was established in 1990 in Bremerhaven in Northern Germany. It has since grown to become one of the leading wind energy companies in Europe and is active in Germany, France, The Netherlands, Portugal, the USA and the UK. The company has built more than 100 onshore wind farms in Europe.

Methodology

The design process involved in formulating the design of the Proposed Development has been led by a combination of environmental design and engineering requirements. The aim has been to arrive at an appropriate layout in terms of energy yield whilst seeking to avoid or reduce environmental effects.

The environmental assessment process also facilitates opportunities for positive design, rather than merely seeking to avoid adverse environmental effects. The Design and Access Statement has an important role in contributing to the design process through the clear documentation of design evolution.

Wind energy is a sustainable form of development and the potential environmental effects are usually associated with the construction period and the temporary effects during the operational period of wind turbines on landscape and visual amenity. The Proposed Development has therefore been developed with environmental considerations at the forefront of both site selection and site design.

The Application

The Mynydd Pencarreg Wind Turbines planning application is submitted in full and in addition to this Design and Access Statement is accompanied by the following documents which should be read together:

- Volume I: Environmental Report (Written Text)
- Volume II: Figures
- Volume III: Technical Appendices
- Planning Statement



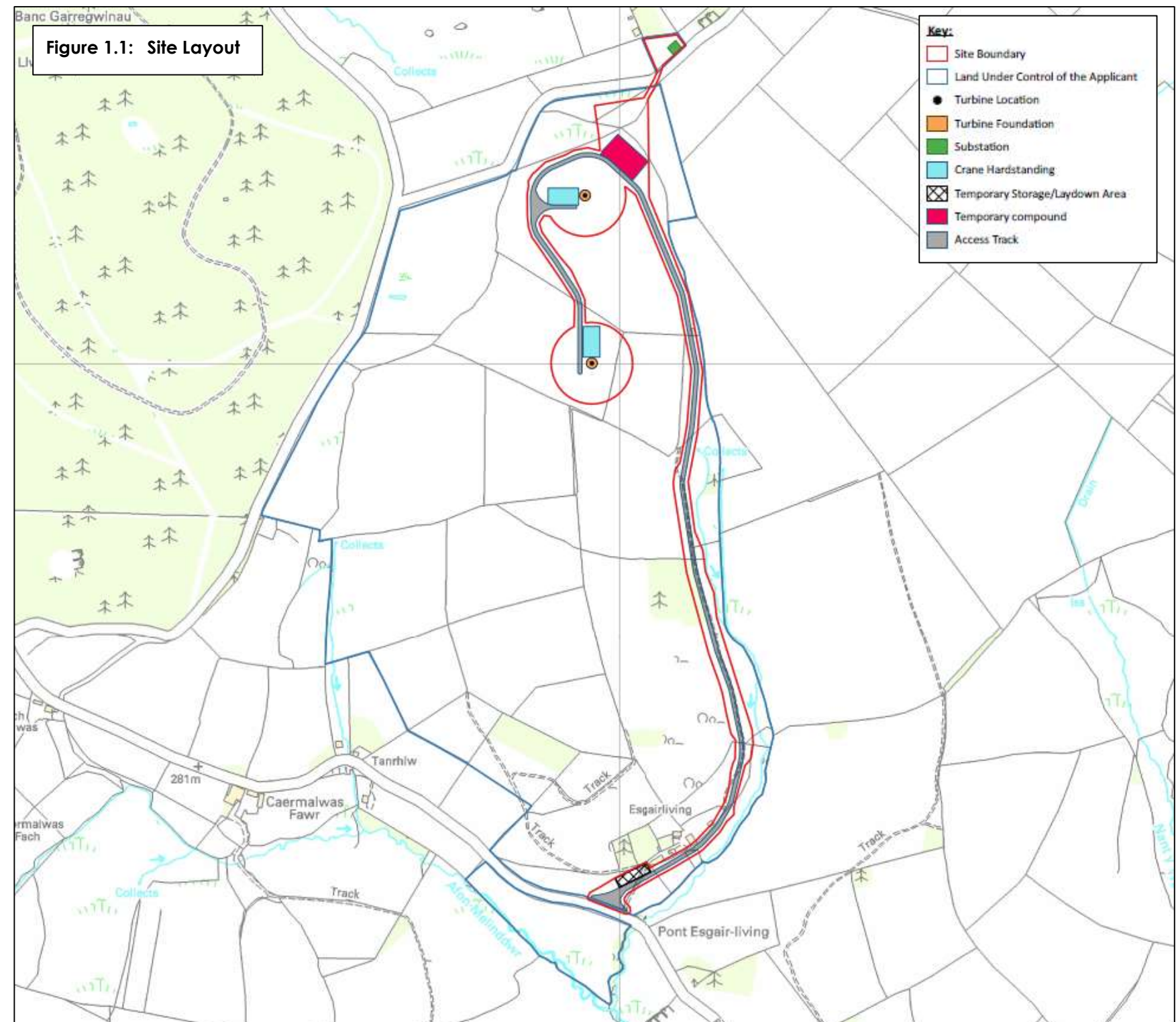
1 Introduction

- 1.1 This Design and Access Statement has been prepared to support a planning application by Energiekontor Ltd (the "Applicant") for the construction of 2 wind turbines on land to the north of Rhydcymerau, as shown on Figure 1.1.
- 1.2 The planning application is supported by this Design and Access Statement which should be read in conjunction with the other supporting documents: Environmental Report, Planning Statement and Pre-application Consultation Report.
- 1.3 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 requires Design and Access Statements to be submitted with planning applications for 'major' development. The Proposed Development is thus required as it is considered 'major' development. The aforementioned regulations also detail the required content. This Design and Access Statement has been informed by the regulation, as well as additional guidance contained within the CABE publication 'Design and Access Statements – How to Write, Read and Use Them', Technical Advice Note (TAN) 12 'Design' (June 2009) and Design and Access Statements in Wales (April 2017).
- 1.4 In accordance with the guidelines published by CABE, the proposed wind turbine proposal has been based on the following:
- Design Component including Assessment; Involvement; Evaluation and Design
 - Access Component
- 1.5 The Company has therefore prepared this Design and Access Statement to explain how this development proposal has evolved and an analysis of the proposed site and its context and consideration of design and access principles relevant to a proposal of this nature.
- 1.6 The Design and Access Statement should explain the design principles and concepts that have been applied to the development, relating to the:
- Amount – on site constructed quantities
 - Layout – the buildings and the spaces in between and the relationship of these to the surrounding environment
 - Scale – height, width and length of each proposed building and space between
 - Landscaping
 - Appearance of the development – what the finished development will look like

- How issues relating to access to the development have been dealt with – i.e., the policy adopted relating to access and how relevant development plan policies have been taken into account
- How the design of the development takes into account its context
- Whether any consultation has been undertaken
- How any issues which might affect access have been addressed

How prospective users will be able to gain access to the development from the existing transport network

- Reasons for choosing the main points of access to the site and the layout of internal routes
- How features which ensure access will be maintained



- 1.7 In light of the above, this Design and Access Statement therefore describes the principles that have shaped and influenced the design of the Proposed Development.
- 1.8 In doing so it draws upon the technical assessments that have been undertaken as part of the environmental assessment work. All of these studies have, to a certain extent, influenced the evolution of the eventual project design and access arrangements, as have the input of various consultees and stakeholders. The Environmental Report considers the design iteration process and explains why the turbines have been plotted in their positions. Consideration was given to potential environmental impacts and elements of the proposals were amended to eliminate, reduce or offset potential adverse effects.

The layout proposal (Figure 1.1) takes into account all the technical and environmental constraints associated with the project. These are detailed within the Environmental Report and this document.

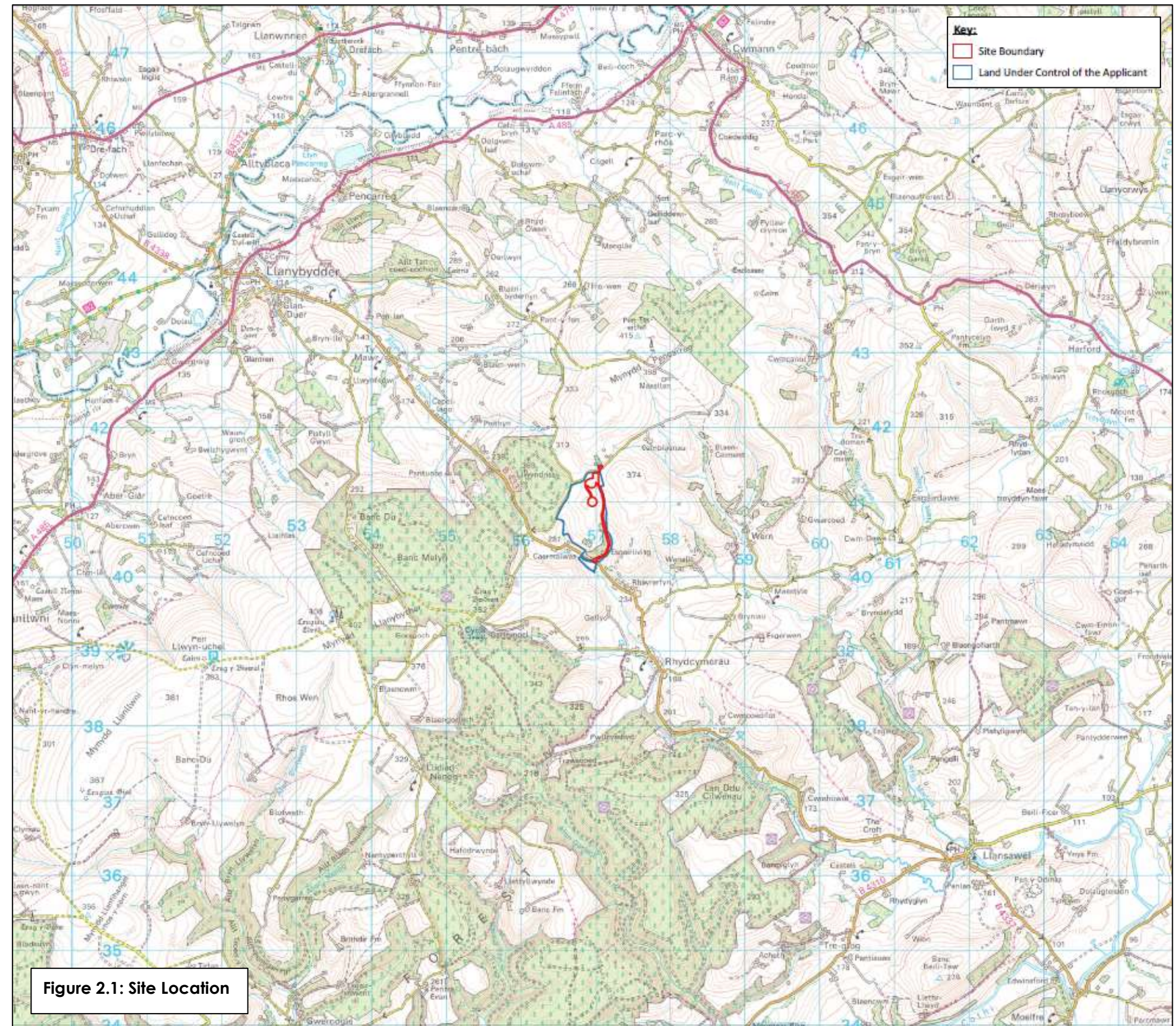
2 Site and Surroundings

2.1 Site Location

- 2.1.1 The Site of the proposed turbines is located to the north of the village of Rhydcymerau, the edge of which is approximately 2.2km from the nearest proposed turbine, 2km west of Wren and 6.5km to the south of Lampeter - See Figure 2.1.

2.2 Site Context

- 2.2.1 The Site is generally characterised by upland grazing agricultural land to the north, with a more enclosed valley character to the south closer to the property of Pont Esgairliving. The wider area is generally defined by upland grazing agricultural land, consisting of open sheep farming agricultural land within a rural landscape. There are some more enclosed areas within the valleys, where larger settlements are more common. The wider area to the south-east consists of large commercial forestry areas, namely Brechfa Forest.



3 The Proposed Use of the Site

3.1 On-site Works

- 3.1.1 The proposal is for two wind turbines. The turbines are vertical structures and normally placed in the open countryside where there is a good wind resource. The term wind farm is normally associated with groups or clusters of turbines, and these vary considerably in size depending on the availability of land and the proximity of surrounding residents and sensitive landscapes. Once constructed, the land between the turbines will continue to be used for agricultural purposes. A wind farm rarely occupies over 1% land coverage of a total farm landholding.
- 3.1.2 The proposed scheme comprises two wind turbines with a maximum tip height of 125m. The proposal encompasses the following, including associated infrastructure:
- 2 nos. wind turbine generators;
 - Turbine transformers;
 - Turbine foundations;
 - Hard-standing areas for erecting cranes at each turbine location;
 - On-site track connecting to turbines
 - Underground cables linking the turbines to the distribution connection;
 - On-site substation;
 - New site access from B4337;
 - Temporary construction compound; and
 - An additional temporary storage/laydown area.
- 3.1.3 All electricity cabling connecting the wind turbines within the Site would be located underground.
- 3.1.4 The proposed development, including the main elements as noted above are presented within this document and shown within the application drawings presented in the Environmental Report.
- 3.1.5 The wind farm would provide up to a total of 5MW of generating capacity.
- 3.1.6 The development would be time limited to 25 years from the first date of electricity export and would include a construction phase (approximately 8 months), an operational phase (25 years) and a decommissioning phase (approximately 6 months).

- 3.1.7 The planning application includes, within the red line boundary, an allowance for potential micro-siting of the wind farm infrastructure. If planning permission is granted, Energiekontor will commission detailed ground investigations and geotechnical surveys to determine the ground conditions. Consequently, the planning application boundary allows for potential micro-siting of wind turbines and associated hardstandings and provision for other site infrastructure including tracks and the substation facility.

- 3.1.8 The construction and decommissioning of the wind turbines, ancillary equipment and on-site infrastructure are described in detail in chapter 3 of the Environmental Report.

Access

- 3.1.9 The site access necessitates works to an existing entrance off the B4337. This junction will be utilised during the construction phase of the works and will remain in place for service access once construction is complete.
- 3.1.10 The access has been designed to allow abnormal and normal vehicles to access / egress the Site directly from the B4337.
- 3.1.11 The proposed amendments to the access involve moving the junction around 20m west of its existing location in order to improve the available visibility and accommodate the swept path of the abnormal loads. The visibility is constrained to 4.5m x 90m east of the junction and 4.5m x 120m west of the junction. It should be noted that once abnormal vehicles deliver their load, they return as "normal" vehicles with a size typical of that of a standard Heavy Goods Vehicles (HGV).

3.2 Wind Farm Operation

Operational Timescale

- 3.2.1 Following construction and commissioning, the wind turbines would be operational and generating electricity for a period of up to 25 years, after which time it would be decommissioned.

Maintenance

- 3.2.2 Wind turbine maintenance would be carried out by the turbine supplier and later by suitably qualified contractors who would visit the site to carry out regular inspection and maintenance activities. The following wind turbine maintenance would be carried out, along with any other maintenance required by the supplier's specifications:
- Initial trial run and service;
 - Routine and non-routine maintenance and servicing; and
 - Blade inspection.

- 3.2.3 Routine maintenance and servicing would necessitate weekly visits to the site by a maintenance crew (if necessary), typically two persons in a small van or other similar sized vehicle. Maintenance staff would be able to park on the crane pad for each turbine.
- 3.2.4 Routine servicing would include the performance of tasks such as maintaining bolts to the required torque, adjustment of blades and inspection of welds in the tower. In addition, oil sampling and testing from the main gearbox would be required and oil and components replaced at regular intervals.
- 3.2.5 In the event of any unexpected breakdowns on-site, such as the failure of a generator or gearbox, appropriate maintenance works would be carried out immediately. The replacement of major components would require a crane and heavy transport vehicles.
- 3.2.6 On-going track maintenance would generally be undertaken in the summer months when tracks are dry. Safe access for maintenance purposes would be maintained all year round.

4 Amount, Layout and Scale

4.1 Constraints Mapping

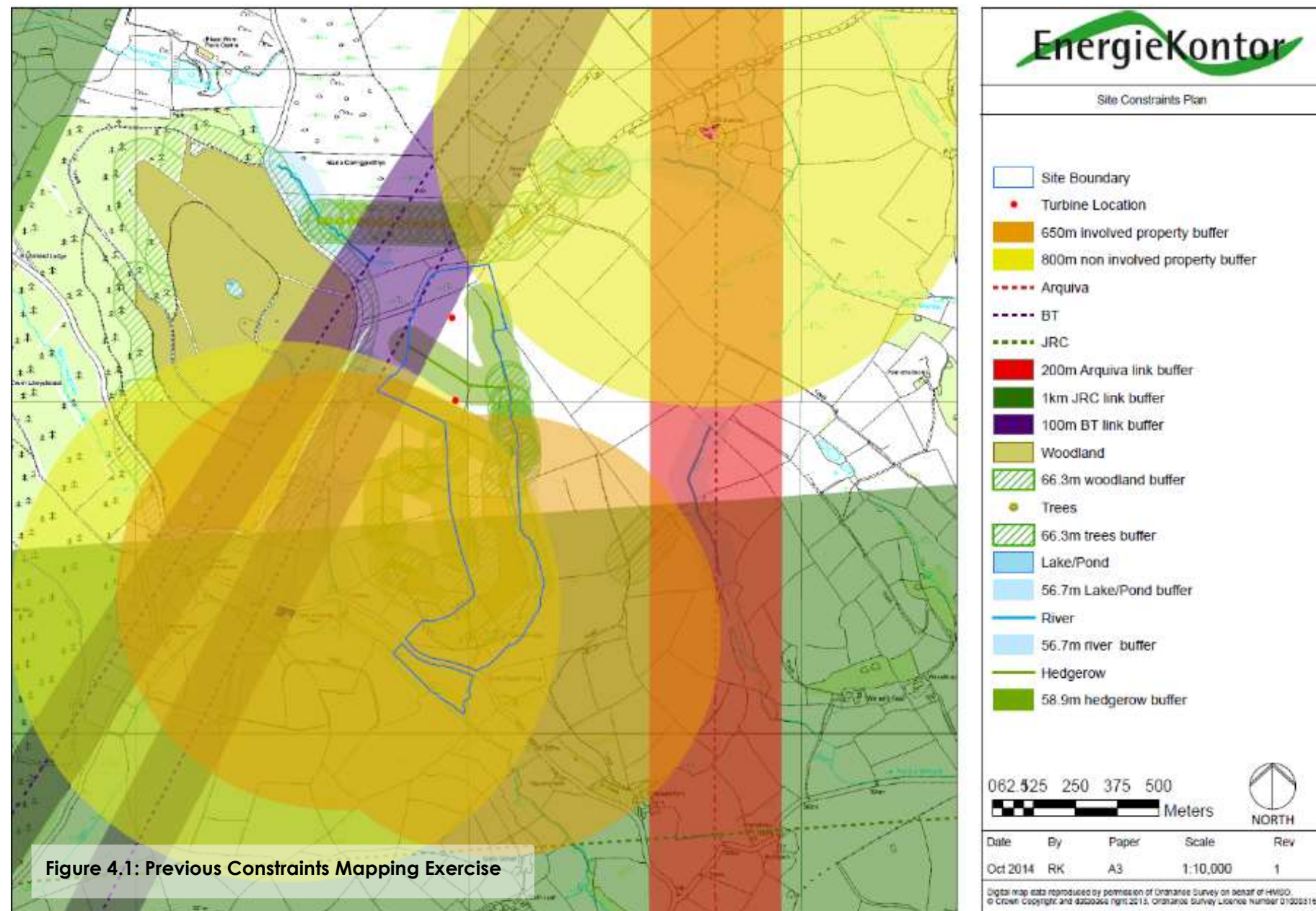
- 4.1.1 The starting point for the Design of the site is the preparation of a detailed constraints map which sets out all relevant buffer distances, key features and other factors that constrain the location of wind turbines.
- 4.1.2 The design process considers technical constraints which could restrict the location of wind turbines. The evolution of design has as such, been informed by matters including stand-off distances to residential properties, public roads, rights of way and landscape considerations.

The figure below show some of the constraints that were taken into account as part of the design process.

- 4.1.3 Due to the planning history associated with the site, the location of the turbines for the Proposed Development are based on elements of previous constraints mapping exercises, which remain suitable and appropriate (see Figure 4.1: Previous Constraints Mapping Exercise).

4.2 Technical Constraints

- 4.2.1 The following technical parameters were taken into account in the design process:
- A separation distance between the turbines of 3.0 – 3.5 rotor diameters (across the prevailing wind direction) and



4.3 Landscape and Visual

- 4.3.1 The principal design objectives of the Proposed Development were as far as possible to:
- Design the wind turbine layout and associated infrastructure to respond to the local landscape character, having particular regard to the content of the published landscape character assessments for the area, and provide an acceptable design solution in terms of scale, layout and visual composition;
 - Achieve a simple, balanced, rational and coherent image when viewed in the local and wider landscape;
 - Minimise landscape and visual effects on views from local residential properties and communities;
 - Minimise landscape and visual effects from recreational routes; and
 - Minimise landscape and visual effects from main transport routes.

4.4 Land Use

- 4.4.1 Consideration has been given to minimising the loss of agricultural land the effects on farming practises during construction and operational phases of the development.

4.5 Noise

- 4.5.1 The Site has been developed to ensure that an appropriate minimum standoff distance to residential properties is achieved. The Environmental Report confirms that the development is within the acceptable noise criteria set out in the Guidance document ETSU R-97.

4.6 Ecology and Ornithology

4.6.1 The Site is not the subject of any international, national, regional or local nature conservation designations and consists of managed agricultural land. As set out in the Environmental Report, the surveys undertaken reveal that there are low levels of ecological and ornithological sensitivity associated with the Site.

4.7 Archaeology and Cultural Heritage

4.7.1 There are no designated cultural heritage assets within the Site and no direct impacts have therefore been identified during the design process. However, there are a number of heritage assets in the wider area and potential effects on the setting of cultural heritage assets have been considered as part of the design process and are detailed in the Environmental Report.

4.8 Design Iteration

4.8.1 The design has been undertaken over a prolonged period and has been progressively revised and refined during this time to take account of the information arising from previous planning applications and findings of various environmental assessments.

4.8.2 Details of some of the key iterations of this design process are outlined below.

4.9 Amount

4.9.1 A number of design objectives particular to this development have been established. Through this method the Proposed Development has evolved to meet these guidelines ensuring that significant landscape mitigation is already 'embedded' within the Proposed Development, prior to the assessment of residual effects.

4.9.2 The Zone of Theoretical Visibility that has been produced to support the planning application (Environmental Report – Figure 4.3) shows that at least 1 no. turbine will theoretically be visible from approximately 33.5% of the 15km study area, and therefore from the remaining 66.5% no wind turbines of the proposed development will be visible. The majority of the views would be limited to areas of high ground, facing the proposed turbines. As the distance increases away from the proposed turbines, the ZTV indicates that views would reduce to smaller scattered areas of land. In reality, the coniferous plantation of the Brechfa Forest, located to the west and south-west of the site would offer a large degree of screening in views from the west, south-west and south.

4.9.3 The amount of development in this instance has been taken to be predominantly comprised of the two wind turbines proposed on the site. The ZTV and the Landscape and Visual Impact Assessment (Environmental Report Chapter 4) indicate that this number of turbines can be absorbed into the landscape. The amount of ancillary development in terms of the access tracks derives from the decision made on the number of turbines and the accessibility of the turbines to public roads. A new on-site electricity substation will be required regardless of the number of turbines proposed.

4.9.4 Figure 4.2 (below) shows a typical modern wind turbine, comprising a three bladed rotor hub mounted on a nacelle (containing gearbox and generator), tower and foundation. A single storey electricity substation will be required and this will contain switchgear, metering and control equipment and facilitate the connection to the local electricity distribution network (Figure 4.3).

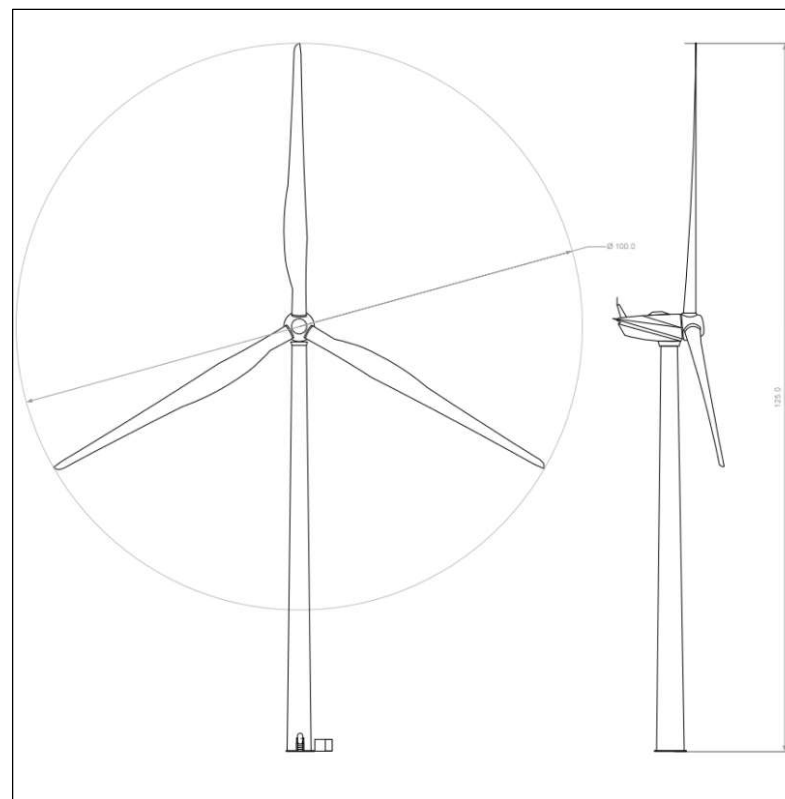


Figure 4.2: Indicative turbine type

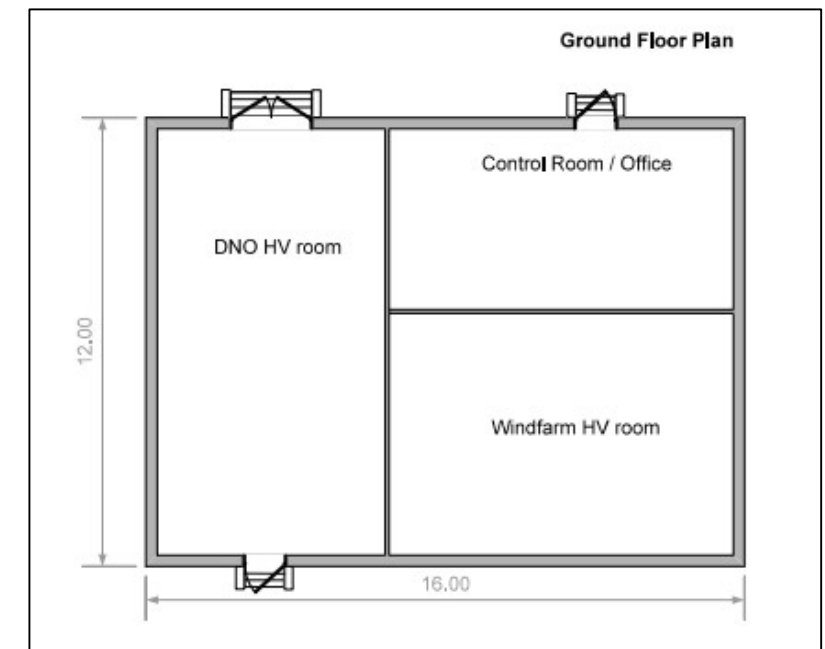


Figure 4.3: Indicative substation elevation

4.9.5 There are many factors which normally determine the amount of development (i.e., turbine numbers and height) proposed for a wind farm. In this case, these factors are primarily the need to achieve maximum distances from nearby residential properties, the nature of the local landscape and need for an appropriate composition together with the minimum internal separation distances required for the effective operation of the wind turbines.

4.9.6 All on site tracks will be of compacted aggregate at a depth of approximately 370mm, a typical surface width of up to 5m with localised widening on curves and at junctions. The final position of wind turbines, the layout of access tracks and the siting of the substation result from the influence and interplay of a number of factors, both on and off site.

4.9.7 The temporary site compound will occupy a total surface area of approximately 2400 square metres during the period of construction (Figure 4.4).

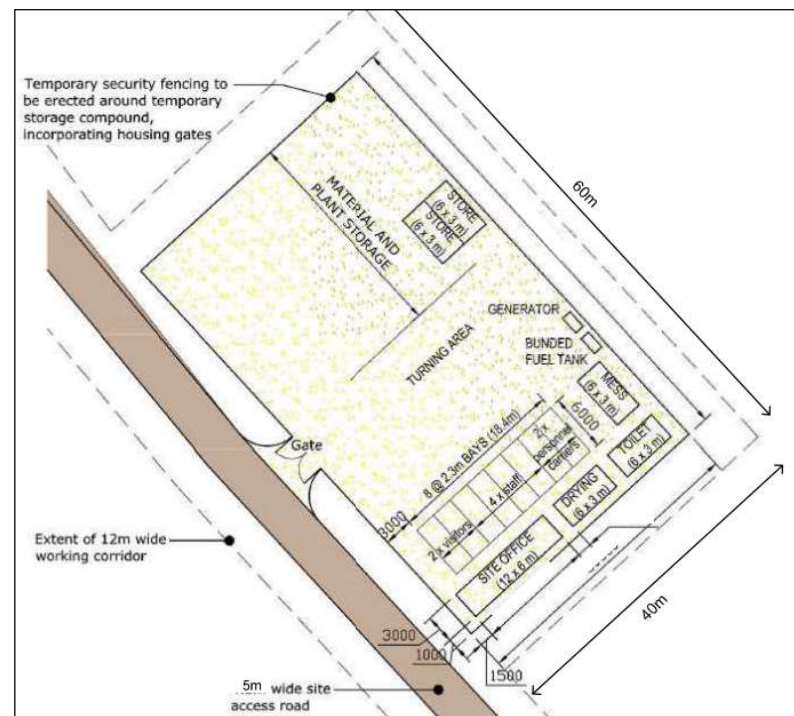


Figure 6: Typical temporary construction compound layout

4.9.8 The topography of the site and the nature of the local landscape were a key consideration in the design of the project. Wireframe and photomontage analysis by landscape architects commissioned by the Applicant has been utilised to design a layout which relates well to the scale and landform of the site and its surroundings in order to minimise landscape and visual effects. The design provides a balanced and well composed layout, which as far as possible avoids visual 'stacking' of turbines behind one another from key viewpoints.

4.9.9 The design process also considered potential noise impacts. Indeed, noise effects are a critical factor in determining the location of wind turbines. Wind turbines generate noise from two sources; aerodynamic noise results from the passage of the blades through the air and noise is also produced by mechanical components of the turbine such as the gearbox. ETSU R-97 details the accepted methodology for assessing the effects of wind farm noise; the guidance document recognises that noise limits should be set relative to the existing background noise levels and that these limits should reflect the variation in both turbine noise and background noise that occurs relative to wind speed. The most effective way to limit noise effects is to ensure that there is sufficient distance between turbines and sensitive receptors. The results of noise propagation modelling undertaken concluded noise effects on the local community would be within acceptable limits detailed in relevant guidance (ETSU R-97).

4.9.10 The effect referred to as 'shadow flicker' was similarly considered in the design process. Under certain combinations of geographical position and time of day, the sun may pass behind the rotors of a wind turbine and cast a shadow over nearby properties. As the blades rotate the shadow can

appear to 'flick on and off' through windows. The effect on the occupiers of receptor properties can be distracting. Shadow flicker can be avoided and minimised by the careful siting of wind turbines. However, any residual effects can be mitigated using turbine control systems which are able to temporarily shut down turbines if light conditions at a particular time of the day would result in shadow flicker being experienced by a particular receptor. Best practice only considers receptors within 10 rotor diameters from the turbine position, in this instance thus equates to 1km. The Environmental Report details the shadow flicker assessment and reports on the findings.

4.9.11 Local hydrology has been examined and taken into account in the layout in order to minimise infringement on the adjacent catchment. A number of mitigation measures are proposed and outlined in Chapter 10 of the Environmental Report.

4.9.12 The local ecology of the site has influenced the design of the access tracks and the location of all elements of the built development components of the proposal. Ecological enhancement and landscaping measures are proposed as part of the Environmental Report with the objective of improving local biodiversity.

4.9.13 A widened site access is proposed to the south of the site. The site access tracks would run northwards from the entrance to the 2 wind turbines. Tracks would be up to 5m wide with localised widening on curves and junctions. Crane pads will be installed near each turbine base.

4.10 Scale

4.10.1 Considerations of scale relate to the physical size of the proposed development. In deciding upon the size of turbines to install there is a balance to be struck between the aims of maximising power generation and ensuring that the environmental effects of the proposals are acceptable, bearing in mind landscape and visual effects (and potential concomitant noise emissions/shadow flicker effects).

4.10.2 Turbine size is a function of the height of the tower i.e., hub height and the radius of the rotor. The rated power increases exponentially as the rotor radius increases. Similarly, an increase in wind speed results in an exponential increase in power. For any given location wind speed rises with elevation above ground because of the effects of wind shear. Raising the hub height of machines can increase energy capture at any given site. In addition, nearby obstacles will increase the turbulence in the wind. High turbulence can affect turbine performance and turbine life expectancy. Technical development has enabled the use of taller towers to position rotors in less disturbed air and maximise electricity generation.

4.10.3 Hence, from a power generation perspective there is a strong economic argument to install the wind turbines with the

largest rotors at the highest possible hub height. However, the developer has balanced this economic factor against the need to ensure that the environmental effects of the development are acceptable; indeed, the main concern with wind turbine developments is often considered to be the visual and landscape effects of the turbines which tends to increase with turbine size.

4.10.4 The scale of the wind turbines for the Mynydd Pencarreg project has been considered through the production and analysis of a comprehensive series of photomontages and wireframes for several different options. The layout has carefully considered proximity of residential property distances and views from properties which lead to the final design of 2 turbines, with a maximum tip height of 125m. A proposal to develop 125m turbines on the Site in the same locations has already been through the planning appeal system and found to be acceptable in all respects.

5 Landscaping

- 5.1.1 There will be limited vegetation removal in order to create both the tracks within the site and to locate the wind turbines. The proposed tracks for the turbines largely follow existing farm access track along the southern part of the site.
- 5.1.2 The loss to any habitat is limited but habitat management is proposed which more than offsets any harm arising as a result of the development from an ecology perspective.
- 5.1.3 The substation would be noticeable from the road adjoining the site to the north but this will be constructed with appropriate finishing's in agreement with the Planning Authority
- 5.1.4 The detail of the distribution connection will be subject to a separate consenting process undertaken by the Distribution Network Operator.

6 Appearance and Design

6.1 The Wind Turbines

6.1.1 The Applicant has decided not to use a lattice-style tower design for the turbines as used in other parts of Europe and the USA. Turbines with tubular tower designs would instead be utilised. The appearance of the wind turbines would be optimised by ensuring:

- Both turbines would be to the same specification from the same manufacturer;
- The turbines would be painted an off white/grey with no graphics on the blades or tower (the final specification of which would be determined in consultation with the LPA);
- All the turbine rotors would rotate in the same direction.

6.1.2 Wind power-related research by Government has shown that the best colour for turbines when seen against Northern European skies is light grey or off-white and that non-reflective finishes are the best treatment for the surface of materials. This would help to reduce visual impact.

6.1.3 The turbine towers would be of tapering tubular steel construction. The blades would likely be made from a fibre reinforced epoxy material. Each turbine requires a transformer. Depending on the final model of turbine chosen transformers may be housed internally within the turbine towers or they may be housed externally in discrete cabinets next to the turbine bases. If they are to be housed externally they are small in size and standard in appearance as shown in Figure 6.1. Figures 6.2 and 6.3 that follow provides typical dimensions.



Figure 6.1: Typical Transformer Housing

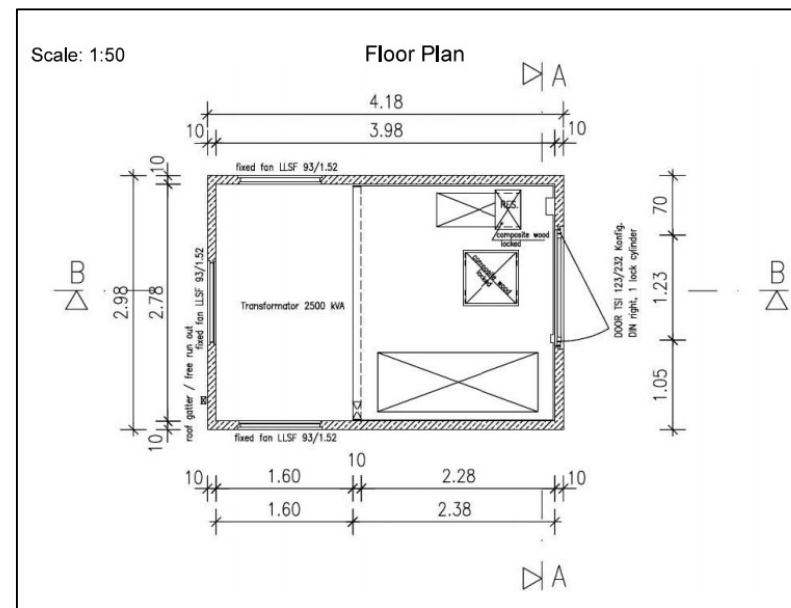


Figure 6.2: Typical Floor Plan

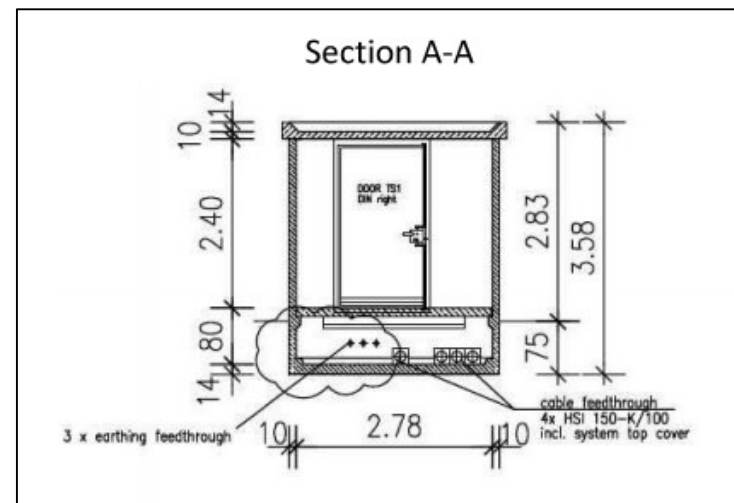


Figure 6.3a: Typical Elevation

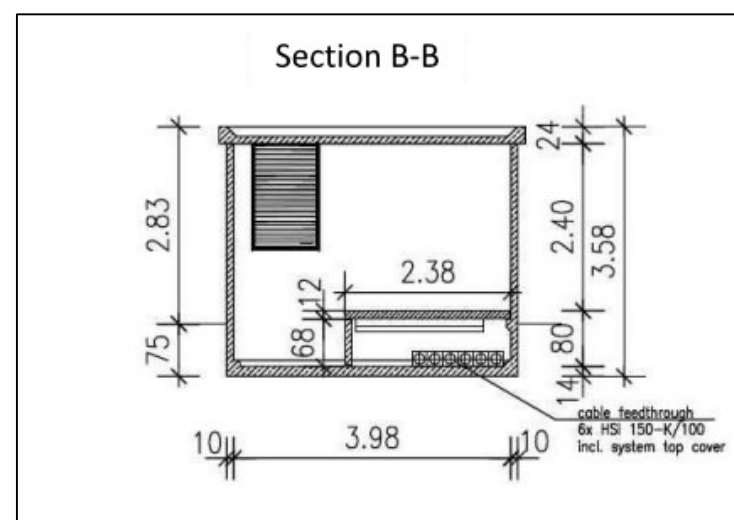


Figure 6.3b: Typical Elevation

6.2 Ancillary Equipment

6.2.1 The electricity substation will be constructed using external finishes and materials which would respect and reflect the local vernacular. These would be agreed with the local planning authority.

6.3 On-Site Infrastructure

6.3.1 In arriving at aesthetic choices, the Applicant has been mindful of the characteristics of the local landscape, the findings of the landscape and visual assessments in the Environmental Report and industry research into the issue of visual aesthetics.

6.3.2 A further design objective that has guided the appearance of the layout and landscaping of the proposals is that the wind turbines should form a balanced composition when observed from key viewpoints in the local landscape.

6.3.3 The construction of the site access tracks will be kept to a simple method i.e., crushed stone aggregates to a nominal depth of 370mm.

6.3.4 The cables between the wind turbines and the substation will be buried below the access tracks and there would therefore be no visual impacts associated with cables. Following construction, the temporary construction compound and storage/laydown area would be removed.

6.3.5 The wind turbines would be established for 25 years which allows time for construction, operation and decommissioning of the project. Decommissioning of the wind turbines would involve the complete removal of turbines, switchgear and other equipment and the removal of the concrete foundations to a depth of one metre below ground level. All of these areas would be re-instated to their original pre-wind turbine condition. In the Applicant's experience the construction compound base and access tracks in some cases are left in place for agricultural use, depending on the preference of the landowner or upon any planning condition attached to the permission.

7 Access

7.1 Access Design process

7.1.1 White Young Green were appointed to undertake preliminary assessments of the ability of the potential delivery route to accommodate the large components that make up the proposed wind turbines. Swept Path Analysis (SPA) assessments were undertaken to identify whether the delivery route could accommodate the swept path of the abnormal load delivery vehicles carrying components such as turbine blades and nacelle. This type of analysis is consequently used to identify any necessary works.

7.2 Abnormal Load Movements

7.2.1 Different transport modes and routes have been discussed for transporting the turbine components, plant machinery and construction materials to the Site. It is likely that all abnormal loads would originate from Swansea. The preferred route to the site is shown to the right.

7.3 HGV Movements

7.3.1 The principal effects on the surrounding road network would be experienced during month 5 inclusive of the construction period, with the most onerous peak two-way movement of 24 HGVs per day.

7.3.2 Any deliveries to the Site would be strictly managed, both in terms of route choice and the timing of deliveries. Deliveries would be scheduled as far as possible to occur outside peak periods.

7.3.3 Police, County Highway Authority and Highways Agency involvement is proposed throughout the planning process to ensure local conditions, seasonal events and any proposed or on-going road works are taken in to account in the proposals. This would ensure that highway safety is maintained, and delays are kept to a minimum.

7.4 Mitigation

7.4.1 Local conditions have been assessed and the percentage increase in traffic generation on the delivery route (A485 and B4337) has been identified. The highest potential percentage increase identified locally (B4337) during the busiest month in terms of traffic movements associated with the construction phase is 4.21%. This minor uplift in movement will be over a short time frame.

7.4.2 A number of mitigation measures are proposed as part of the Proposal, in particular, during the construction process, which will further minimise the effects of site traffic on the surrounding highway network and nearby receptors. Measures will be agreed as part of a Traffic Management Plan (TMP). The TMP will detail environmental measures aimed at minimising adverse environmental effects associated with traffic and transport during construction and will be agreed between the Contractor, the local Highway Authority and any other relevant parties prior to the start of construction.

7.4.3 The TMP will include details on car parking, measures to encourage multi-occupancy of vehicles bringing construction personnel to site, temporary road signage requirements, off-loading proposals, construction traffic routeing and timing of deliveries. It is envisaged that during construction, deliveries will be co-ordinated by a logistics manager to prevent queuing of vehicles.

7.4.4 The TMP will look at the preferred access route for HGVs and abnormal loads, in collaboration with the police and the local Highway Authority. The abnormal load deliveries will be timed within the constraints imposed by authorities to avoid peak traffic periods, thereby minimising any possible driver delays. Liaison between local residents and Energiekontor will be undertaken as part of the TMP, including the scheduling of major traffic movements to reduce impact on local residents where possible.

7.4.5 The impacts associated with traffic from the construction of the Proposal are short term (approximately 8 months duration) and can be managed and monitored to ensure that they are not considered significant (in terms of EIA regulations).

