Frodsham Solar

Assessment of Alternative Future Baseline Following Decommissioning of Frodsham Wind Farm

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1.0 INTRODUCTION

1.1.1 This report follows a request from Cheshire West and Cheshire Council ('CWACC') emerging from Issue Specific Hearing 1 ('ISH1'). This is detailed in the summary of **CWACC's oral submissions at the first set of hearings (REP1-047)** regarding Agenda Item 5.a) – 'Major replacements during the operational phase' in the **Agenda for ISH1 (EV2-002)**.

1.1.2 At ISH1, CWACC outlined their view that, since Frodsham Wind Farm ('FWF') is due to be decommissioned in 2042, these works would clash with any replacement activities for Frodsham Solar and therefore this worst-case scenario in terms of cumulative effects needed to be assessed.

1.1.3 CWACC has also made submission at various deadlines that the Applicant needs to assess the impacts of the Proposed Development in a future baseline scenario where Frodsham Wind Farm is no longer in place.

1.1.4 The view of the Applicant is that this situation is unlikely due to prevailing policy on the need for renewable energy. This means that FWF is likely to be re-powered to last beyond 2042.

1.1.5 However, notwithstanding this view, the Applicant has chosen to provide an assessment of the above scenario at the request of CWACC.

2.0 SIMULTANEOUS FWF DECOMMISSIONING AND PROPOSED DEVELOPMENT REPLACEMENT ACTIVITIES

2.1 Frodsham Wind Farm

2.1.1 FWF was granted consent from the Secretary of State for Energy and Climate Change under Section 36 of the Electricity Act 1989 in October 2012. The wind farm has a capacity of 50MW, and consists of the following elements:

- 19 wind turbines, not exceeding 125m in height to the tip of each blade;
- an anemometry mast not exceeding a height of 80m;
- 33kV/132kV underground electrical cabling;
- a 33kV/132kV electricity substation; and
- ancillary development including necessary buildings and access tracks.

2.1.2 This consent was accompanied by a series of conditions. Condition 48 pertains to the process by which FWF will eventually be decommissioned. It states:

> *'Not later than 12 months before the expiry of this planning permission pursuant to Condition (4) or within 12 months of the Site ceasing to be used to produce electricity, whichever is the sooner, the Company shall submit to the LPA, for approval in writing, a scheme for the demolition and removal of the surface elements of the Development, and foundations to a depth of at least 1.2m below ground level (as it was when the Development ceased to be used to produce electricity). The scheme shall be carried out as approved and at the Company's expense.'*

This means that the decommissioning statement would need to be prepared by the operator of FWF.

2.1.3 Conditions 49 to 54 of the consent provide further detail on decommissioning, particularly around landscaping schemes and restoration of the Site upon ceasing to generate electricity.

2.2 Frodsham Solar/FWF Cumulative Effects

2.2.1 The **outline Operational Environmental Management Plan (oOEMP) (REP3-002)** has set out in paragraph 2.4.12 the procedure in the event that the Applicant is informed of FWF submitting a decommissioning scheme in line with Condition 48. It states:

> *'If Cheshire West and Chester Council at any time notifies the Applicant that it has received a scheme for the demolition and removal of Frodsham Wind Farm under Condition 48 of the Frodsham Wind Farm consent, or that it has granted planning permission for re-powering of Frodsham Wind Farm then:*
>
> *i) if such notification occurs prior to the submission of a notification under paragraph 2.4.7, then that notification must take account of the information provided in the scheme/planning application submitted by Frodsham Wind Farm; and*
>
> *ii) if such notification occurs after the submission of a notification under paragraph 2.4.7 and the Proposed Development replacement activities have not yet taken place, the Applicant must resubmit the paragraph 2.4.7 notification to take account of the scheme/planning application submitted by Frodsham Wind Farm for additional approval prior to commencing the Proposed Development replacement activities.'*

2.2.2 Paragraph 2.4.7 in the oOEMP, as described in the above quote, relates to the requirement for the Applicant to submit a notification to CWACC

containing details of management measures in place for replacement activities.

2.2.3 As such, CWaCC will be able to ensure that the impacts of decommissioning of the wind farm and replacement activities for the Proposed Development taking place at the same time are managed and mitigated, utilising the mitigation measures set out in the OEMP, and in the decommissioning scheme approved pursuant to FWF condition 48.

2.2.4 Given that no significant effects have been identified from replacement activities of the Proposed Development through the application of the OEMP mitigation measures, it is assumed that CWaCC would impose similar requirements on FWF as part of the approval of the decommissioning scheme. This would ensure that no likely significant effects would arise.

2.2.5 It is assumed that upon decommissioning, the access tracks as part of the FWF development would remain in place. They would then be used by the Frodsham Solar scheme and would be part of any eventual decommissioning plans.

2.2.6 Upon decommissioning of the FWF, the mitigation obligations on FWF in place would cease. This would include the mitigation provided in Cells 1, 2, 3 (i.e. the Non-Breeding Bird Mitigation Area) and 5, and the continued operation of Cell 6. While this may remain active for the purposes of facilitating the management of dredgings from the Manchester Ship Canal, this would no longer be controlled by virtue of the FWF consent.

3.0 ASSESSMENT OF EFFECTS UNDER ALTERNATIVE FUTURE BASELINE

3.1 Introduction

3.1.1 The Applicant has undertaken a review of the **Environmental Statement (ES) [APP-033 to APP-124]** to consider whether, and if so how, the decommissioning of Frodsham Wind Farm would alter the future baseline against which the likely significant effects of the Proposed Development have been assessed**, the 'alternative future baseline scenario'.**

3.1.2 In this context, the existing baseline conditions remain unchanged until such time as Frodsham Wind Farm is decommissioned, which is assumed to be 2042 for the purposes of this assessment. Accordingly, the findings of the assessments presented in the Environmental Statement remain unchanged for the period up to 2042. The potential for change arises only post-2042, when the infrastructure from the wind farm and any associated mitigation currently in place are removed.

3.1.3 The following sub-sections therefore consider each relevant topic area addressed within the Environmental Statement in turn, and assess whether the decommissioning of Frodsham Wind Farm would give rise to any materially different environmental effects compared to those reported in the Environmental Statement

3.2 Climate Change

3.2.1 Removal of the turbines would not impact the baseline against which the carbon calculations presented in the ES are calculated. It could be argued that the decommissioning of Frodsham Wind Farm would reduce the capacity of renewable energy available in the UK and therefore increase the importance placed on remaining renewable energy resources. However, this would require speculation about the status of the generation mix in 16 years, and is unlikely to materially alter the conclusions presented in the chapter in any event. It is therefore concluded that the alternative future baseline

scenario would not affect the conclusions of the ES, nor would it result in the Proposed Development giving rise to any significant environmental effects in relation to climate change.

3.3 Landscape and Visual Amenity

3.3.1 The LVIA explicitly recognises that baseline conditions at Frodsham Marshes include the Eastern Cluster of Frodsham Wind Farm (six turbines) within the Order Limits / Solar Array Development Area, alongside other prominent existing influences including electricity pylons/overhead lines, the M56, and extensive industrial development at Runcorn and beyond.

3.3.2 The LVIA's residual conclusions are that likely significant landscape and visual effects are localised and primarily relate to: (i) the character of CWaCC LCA4a (Frodsham, Helsby and Lordship Marshes); and (ii) a limited number of close-range public rights of way / viewpoints within or immediately adjacent to the Order Limits.

3.3.3 In considering the alternative future baseline scenario, it is acknowledged that removal of the turbines would, in some locations, reduce the presence of prominent built structures and could lead to a perception of a more open/less developed marshland baseline.

3.3.4 The visual experience of recreational users of nearby PRoW and PRoW within the Site would alter. The change in a user's experience would depend on where they are within the network of PRoW. In some views, this may lead to a perception of a more open landscape character. However, given the nature of the existing landscape context, the removal of the turbines would not materially alter the wider views and appreciation of landscape character.

3.3.5 The Applicant's review concludes the change to the baseline would not give rise to materially different LVIA conclusions, for the following reasons.

3.3.6 The level of effect reported in the LVIA is not dependent on the wind turbines being present as a baseline influence that reduces effects. In other words, the turbines were not treated as a moderating component that altered the significance of effects arising from the Proposed Development. The close-range effects identified are driven by the relationship between receptors and the Proposed Development itself (including proximity, the extent of visibility, and the resulting change in view/landscape character), and those drivers would remain post-2042.

3.3.7 The wind farm is one element within a wider, complex assemblage of existing man-made influences. While the turbines have some distinct characteristics (including movement and a distinctive vertical form), their removal would not result in a simple or “undeveloped” baseline. A range of other infrastructure and built elements would remain evident, continuing to contribute to a diverse and visually complex landscape context. Accordingly, the removal of the turbines would not, of itself, be expected to materially alter the LVIA’s overall conclusions as to the nature, distribution and significance of effects attributable to the Proposed Development.

3.3.8 Overall, while decommissioning of Frodsham Wind Farm in 2042 would alter the future baseline by removing prominent turbine structures, the Applicant’s review concludes that the LVIA findings would not change.

3.4 Terrestrial Ecology

3.4.1 The decommissioning of the turbines would remove the potential for turbines to act as obstacles which birds may otherwise need to route around. However, the Frodsham Wind Farm Monitoring Reports conclude that, following five years of observation, activity patterns remained consistent with previous years and that numbers recorded were stable, with no overall decline in activity. Monitoring indicates that the most common flight routes are either across Cell 3 or generally avoid the turbines when entering the Weaver corridor. On this basis, whilst decommissioning of the turbines may result in

some alteration to flight patterns, this is unlikely to have a significant influence on the value of the Site for birds or result in a different conclusion on the impact of the Proposed Development on bird populations.

3.4.2 The removal of the turbines would reduce potential sources of disturbance and could therefore increase the extent of the Site available for use by birds. However, there would be no control over the management of land within Cells 1, 2, 3 and 5, which are currently managed to encourage golden plover, lapwing and curlew. In the absence of the FWF consent, it is uncertain how the land would be managed in the future. However, it is reasonable to assume that, without the current management measures secured through the wind farm consent, the land would likely revert to more intensive agricultural grazing.

3.4.3 Decommissioning of the turbines would also result in the removal of areas of hardstanding associated with access tracks, turbine bases and other infrastructure. It is anticipated that these areas would be reinstated to grassland and returned to grazing. However, the extent of additional habitat created in this way would be relatively small in the context of the wider Site.

3.4.4 As such, while the removal of turbines could provide some potential ecological benefits, including reduced disturbance and the potential for a greater extent of grassland to be available as a high tide roost, the principal factor influencing ecological value would remain land management practices. These are uncertain in the absence of the planning controls currently secured through the FWF consent.

3.4.5 The mitigation measures associated with FWF were designed to ensure no adverse effects on the integrity of the Mersey Estuary SPA and Ramsar site. The mitigation proposed as part of the Frodsham Solar scheme is additive and has been developed with reference to habitat availability and quality across the entire Site. On this basis, it is not considered that a change in baseline conditions resulting from the decommissioning of the wind farm

would materially alter the conclusions of the assessment as the NBBMA will still be being maintained in line with the DCO obligations for the Proposed Development.

3.4.6 In relation to other ecological receptors, the removal of the turbines is unlikely to alter the baseline ecological conditions of the Site in a way that would materially affect the findings of the ecological impact assessment presented within the Environmental Statement.

3.5 Flood Risk and Surface Water

3.5.1 The turbines are located in Flood Zone 1 and the decommissioning of FWF would not alter flood risk.

3.5.2 Operational wind farms do not present a significant risk to water quality and so decommissioning is not considered to alter the baseline water quality status.

3.5.3 It is therefore concluded that the alternative future baseline scenario would not affect the conclusions in relation to flood risk and surface water quality.

3.6 Ground Conditions

3.6.1 It is likely that the turbine foundations would remain in situ following decommissioning. However, regardless of whether the foundations are retained or removed, the presence or removal of turbines and other associated infrastructure from FWF would not be expected to alter ground conditions in a manner that would interact with, or affect, the Proposed Development such that it would alter the findings of the ground conditions assessment.

3.6.2 Operational wind turbines do not present a significant risk of contamination. Furthermore, decommissioning activities would be undertaken in accordance with an approved decommissioning scheme that would be prepared and determined in the knowledge of the presence of the Proposed Development.

The plan would therefore include measures to ensure that decommissioning works do not give rise to contamination that could affect soil, groundwater or surface water quality.

3.6.3 Accordingly, the removal of the turbines and associated infrastructure is unlikely to alter baseline ground conditions to such an extent that it would have a material effect on the ground conditions assessment presented in the ES.

3.7 Cultural Heritage and Archaeology

3.7.1 The removal of the wind turbines would not give rise to any change in the baseline in respect of buried archaeology. The turbines within the Site are located within the former Manchester Ship Canal dredging deposit grounds, where the archaeological resource has already been subject to substantial previous ground disturbance. Furthermore, it is anticipated that turbine foundations would remain in situ following decommissioning. In these circumstances, the removal of the above-ground turbine structures and other associated infrastructure would not result in any additional ground disturbance and would not alter the baseline conditions relating to below-ground archaeological remains.

3.7.2 In relation to built heritage and the setting of heritage assets, the removal of the turbines would be perceptible from certain nearby assets. However, the wider landscape context would remain one characterised by large-scale infrastructure and industrial features. The absence of the turbines would not materially alter this prevailing character. As such, it is considered very unlikely that the contribution made by setting to the significance of heritage assets would change to such a degree that the assessment of effects arising from the Proposed Development would differ under the alternative future baseline.

3.8 Tourism and Recreation

3.8.1 The baseline conditions for tourism and recreation across the Site and surrounding area include a network of Public Rights of Way (PRoW), including footpaths and restricted byways that allow access by pedestrians, cyclists and horse riders. National Cycle Route 5 also passes close to the Site. These routes provide opportunities for informal recreation including walking, cycling and horse riding.

3.8.2 The recreation use and value of the PRoW network is primarily associated with access to the wider marshes and views towards the Mersey Estuary and surrounding landscape.

3.8.3 rather than the presence or absence of wind turbines.

3.8.4 The removal of the turbines would not alter the physical accessibility of the Site or surrounding area, nor would it affect the alignment of the PRoW network. Recreational use of the area would therefore continue to be influenced primarily by the availability and condition of routes.

3.8.5 The wider context of the Site is characterised by a range of existing infrastructure and industrial influences associated with the Mersey Estuary corridor, including overhead electricity lines, the M56 motorway and industrial development at Runcorn and the surrounding area. The removal of the turbines could alter the visual experience of recreational users of nearby PRoW by reducing the presence of large vertical structures within the landscape. The change in a users experience would depend on where the are within the network of PRoW. In some views, this may lead to a perception of a more open landscape character. However, given the nature of the existing landscape context, the removal of the turbines would not materially alter the broader recreational setting. For others, the removal of the turbines would be perceived as the loss of a feature of interest from the Site.

3.8.6 On this basis, whilst the decommissioning of Frodsham Wind Farm would result in some change to the visual baseline experienced by recreational users, it is not considered that this change would materially alter patterns of recreational use or the attractiveness of the area for tourism and recreation.

3.8.7 Accordingly, the removal of the turbines would not alter the baseline conditions to such an extent that it would materially affect the conclusions of the tourism and recreation assessment presented in the ES.

3.9 Other Topics Scoped out of the ES

3.9.1 A number of environmental topics were scoped out of the Environmental Statement (ES) for detailed assessment. These include traffic and transport, air quality, noise, agricultural land, major accidents and disasters, and waste.

3.9.2 The decommissioning of Frodsham Wind Farm is not considered likely to result in any changes to the baseline conditions for these topics that would give rise to the potential for significant environmental effects under the alternative future baseline scenario.

3.9.3 Of the topics scoped out, the only subject that could potentially be influenced by the decommissioning of the wind farm is the background noise environment. However, at the sensitive receptors located closest to the Proposed Development, the predominant source of background noise is traffic associated with the M56 motorway. The removal of noise associated with the operation of the wind turbines would therefore not materially alter the background noise environment. As such, this would not affect the conclusions of the noise assessment, particularly given the low operational noise levels predicted to arise from the Proposed Development at nearby receptor locations.

4.0 CONCLUSIONS

4.1.1 The decommissioning of FWF would alter the baseline conditions of the Site, noting that this change would not be experienced until 2042 at a point when

the Proposed Development would have been present, in construction and operation, for approximately fourteen years.

4.1.2 The removal of the turbines would reduce the presence of prominent built structures and could lead to a perception of a more open or less developed marshland baseline. While this change would be highly noticeable from receptors with clear views towards the Site and within the Site, other infrastructure and built elements nearby would remain visible, continuing to contribute to a diverse and visually complex landscape context. Therefore, the decommissioning would not materially affect the judgments made regarding landscape and visual effects or the setting of heritage assets.

4.1.3 From an ecological perspective, the decommissioning of the FWF would influence the baseline environment, but not to an extent where the impacts of the Proposed Development would change significantly. The mitigation measures proposed for the birds of the SPA, particularly the Non Breeding Bird Mitigation Area, have been developed to provide additive mitigation to that already in place for FWF. Therefore, it is not considered that the future baseline scenario would materially affect the conclusions of the ES.

4.1.4 The future baseline scenario is not considered likely to have a material bearing on the conclusions reached in relation to Climate Change, Flood Risk and Surface Water, Ground Conditions, Tourism and Recreation, or the other environmental topics which were scoped out of the ES.