R2 Offshore Wind Energy SEA

Consultation Report Responses

38 responses were received to the consultation on the Environmental Report. The main themes raised, and the DTI's response to them, are set out below.

1. General

a) Selection of strategic regions

Several respondents criticised the selection of the strategic regions. For example:

- The Countryside Agency was uncertain as to how and why the three strategic regions were chosen.
- The Marine Conservation Society said that it did not regard the boundaries of the three Strategic Areas as logical; and stated that an ecosystem basis should have been used.
- LE Group (developer) complained that the framework being proposed appeared to discourage development outside the proposed regions e.g. other areas of the UK such as Scotland.
- London Array (developer) suggested that interest shown for areas outside strategic areas warranted a statement from DTI on the process and timescale to be applied for future rounds and SEAs.

DTI Response

The reasons for the selection of the three strategic regions were explained in Future Offshore, the Department's consultation paper published in November 2002. The areas were selected as having the most promising potential for development, following an analysis of the potential wind resource available, the bathymetry of the offshore area, proximity to grid connections and preliminary expressions of interest from developers.

Looking ahead, the DTI will continue its programme of SEA to help guide policy and planning decisions for future site leasing rounds.

b) How Environmental Report will influence Round 2

Several respondents said that they were unclear how the Environmental Report would influence next steps. Points made included the following:

- The Countryside Council for Wales was uncertain how the results and conclusions would be used
 to influence the licensing of round two sites. The Council also commented that the assessment
 was currently too general. It gave no indication of the 'carrying capacity' of each of the strategic
 areas other than the physical seabed space available.
- English Nature was unclear as to the process that would be used to incorporate the conclusions
 into the next licensing phase, given that there remained many uncertainties and the tight
 timescale that was envisaged. It stated that consideration now needed to be given to identifying
 areas within each Strategic Area within which risks and uncertainties were lowest/highest to allow
 development to proceed (e.g. use of interim location criteria such as a specified radius from
 coastal SPAs).
- The Marine Conservation Society stated that based on SEA results DTI should give clear guidance on blocks appropriate for license applications and those that were inappropriate; and

that to avoid a concentration of wind farms within the 12nm limit only half of consents should be within 12nm and the other half should be beyond 12nm (east and west coasts of England).

- The British Wind Energy Association stated that clarification was needed on whether the purpose
 of the SEA was to make decisions about site selection or provide supporting information for the
 decision making process.
- National Wind Power (developer) was unclear of the intended scope of the document, its contents
 and the role it would play in DTI/regulators' decision-making process. It argued that SEA should
 not be used to make site selection decisions? this was best left to EIAs.
- Powergen Renewables (developer) sought clarification on how cumulative impacts would be handled prior to individual site work (EIAs) and significant expenditure incurred.
- Le Secretariat General de la Mer (France) commented that the Report did not present firm pointers to areas where wind farms might/might not be permitted. Instead it just gave general observations on additional studies needed.

DTI Response

The announcement of Round 2 explains that the Department has taken account of the Environmental Report by excluding from the areas to be offered to developers a coastal strip of minimum width 8km but extending to 13km in areas of particular sensitivity. In addition certain shallow coastal waters have been excluded in the North West region. Furthermore developers have been advised to consider other impacts discussed in the Environmental Report in selecting the sites for which they will bid.

c) Precautionary principle

Three respondents (Kent County Council, the Marine Conservation Society, and the RSPB) stated that the Government needed to adopt a precautionary approach to wind farm development given the data gaps and uncertainties.

Powergen Renewables (developer) on the other hand was concerned that the recommendations in 12-3 and 12-4 (based in part on the precautionary approach) would artificially restrict potentially sound developments.

DTI Response

DTI has adopted a precautionary approach by excluding from the areas to be offered to developers a coastal strip of minimum width 8km but extending to 13km in areas of particular sensitivity.

d) Overall balance

No major themes emerged from the consultation response on this score. The British Wind Energy Association was concerned to note a number of instances within the Report in which assertions were made and implications drawn, on the basis of limited information and minimal consultation. The Royal Yachting Association stated that the Report should admit that it was "a start" and by no means complete. Powergen Renewables (developer) commented that the overall approach and focus of the Report was correct, whilst LE Group (developer) argued that the benefits of offshore wind development, e.g. contribution to climate change programme, should be balanced against constraints.

e) Timescale

Many respondents (the Council for National Parks, the Countryside Council for Wales, several Sea Fisheries Committees, the Joint Nature Conservation Committee, the Marine Conservation Society, and RSPB) expressed concern that the consultation period was rushed.

The British Wind Energy Association on the other hand commented that it was vital to retain the momentum established on Round 1 by moving quickly to begin Round 2.

DTI Response

Future Offshore, which set out an overview of the issues, had a full three-month period for consultation ending on 20 February 2003. The timescale for consultation on the Environmental Report was flagged in Future Offshore, and to have allowed a further three months for responses to the Environmental Report would have introduced too much delay.

To assist marine users get to grips with the Environmental Report, a Stakeholder Workshop was held during the consultation period on 16 May2003.

2. Seascapes and the near shore zone

Many comments concerned the effects of development in the near shore zone and in particular the impact on seascape. For example

- The Council for National Parks called for a presumption against any development in an area of high sensitivity (within 13km offshore). This should include National Parks with coastal seaboards. The Council commented that there was only a limited assessment of the potential seascape impacts of lighting associated with offshore wind energy development; and questioned the assumption that large scale seascape was considered to have more capacity to accommodate this type of development.
- The Countryside Agency agreed with views in the Report that wind energy scenarios within a range of 10,200-17,500MW could be located without detriment to seascape and landscape character if capacity was based on large wind farms constructed well away from shorelines. The Agency agreed with recommendations in Report for siting and design of wind farms. It queried allocation of some of the scores in the seascape/landscape assessment approach used (e.g. Morecambe Bay, St Bees Head and Spurn Head) and requested that some re-working might be appropriate.
- The Countryside Council for Wales said it would like to see a strategic approach that avoided the
 majority of development occurring within the near shore zone of high visual sensitivity and in
 shallow areas and avoiding areas where sensitive and vulnerable species congregated. The CCW
 also supported the recommendation that DTI "might consider introducing interim location criteria".
- The Council for the Protection of Rural England accepted the Report's conclusions regarding determination of locations where wind farm development would have least impact on seascapes. It commented that there was inconsistency between sections 5.2.1 and 9.12 with regard to minimum offshore limits that needed to be clarified.
- Several local Councils (Dumfries & Galloway Council, and Kent and Norfolk County Councils) were concerned that seascape and landscape issues were not adequately addressed in the Report
- National Wind Power (developer) was not convinced that the seascape approach provided credible results to determine areas that might be 'go/no go' in terms of the second round announcement.
- Renewables North West commented that the negative assessment of visual amenity issues was overstated, and that Danish evidence indicated that there was no effect on tourism.

DTI Response

As explained above, the Round 2 announcement excludes from the areas to be offered to developers a coastal strip of minimum width 8km but extending to 13km in areas of particular sensitivity. In addition certain shallow coastal waters have been excluded in the North West region. Future site leasing in the three strategic areas may be revisited in the light of further studies undertaken as part of the SEA programme (e.g. on seascape methodology) and also with experience gained from early wind farm developments.

3. Overhead Lines and onshore developments

Many comments concerned the failure of the Environmental Report to address the impact of related onshore development. For example:

- The Council for National Parks was concerned that the SEA did not take sufficiently into account
 the various ancillary components of offshore wind energy developments such as onshore grid
 connections. The Council argued that DTI needed to ensure adequate consideration ("strict
 guidelines") of onshore landscape and related impacts in EIAs for Round 2 developments.
- The Countryside Agency stated that additional onshore overhead transmission line landscape impacts had not been considered sufficiently. DTI should commission further work on this issue to ensure that the onshore 'aspects' were considered at the strategic level to inform further licensing rounds.
- The Council for the Protection of Rural England was very disappointed concerning the lack of consideration of the implications of ancillary works and transmission infrastructure. It felt that the SEA should evolve to consider more fully the implications of onshore connection and transmission activities needed for offshore wind farm development. The results of this work should inform strategic decisions on offshore locations. Local authorities should be involved in the consents procedure for ancillary works and transmission infrastructure.
- The Countryside Council for Wales was disappointed that there appeared to be only passing reference to overhead lines.
- Norfolk County Council commented that DTI should have regard to the sensitive Norfolk coast landscape and planning for any onshore developments.
- Wirrall Borough Council stated that developers should be encouraged to open discussions with the local planning authority to help facilitate the provision of the onshore infrastructure.
- National Grid Transco argued that issues with the routing of cables or overhead lines, the impact
 of deeper system reinforcements and associated onshore developments should have been more
 fully considered as part of the SEA. Such issues should be considered in SEA Phase 2. NGT also
 stated that the Report should acknowledge the possibility of new connection points or an
 extension of the grid system closer toward landfall locations if there were environmental benefits
 in so doing.
- London Array (developer) was surprised that little was included on the cable landing issues associated with connections to the NGT transmission system.
- Powergen Renewables (developer) stated that the Report did not address the possible cumulative impact of cable landfalls in sufficient detail.

DTI Response

The impact of developments on onshore landscape should be addressed by developers in preparing their EIAs. The Department does not believe that it would have been feasible to address the impact on onshore landscape in SEA at this early stage, although as the need for onshore grid reinforcement clarifies it may be sensible to address the implications in future SEA work. It should be noted that SEAs undertaken for oil and gas are limited to offshore impacts.

4. Fishing

A number of respondents expressed concern about the effects of developments on fisheries and fishermen. Points made include the following:

 The Cumbria Sea Fisheries Committee argued that the interests of sea users such as fishermen must be respected and disagreed with two of the risk estimations. It argued that impacts from construction of Round1 wind farms should be taken into account in future SEAs; and that impacts needed to be understood and evaluated before decisions were made on timing and scale of further developments.

- The Eastern Sea Fisheries Joint Committee stated that the fisheries data in the Environment Report showed significant weaknesses. (The Committee provided specific and detailed comments and corrections to fisheries data and analysis of impacts on fish and shellfish stocks and fisheries.)
- The Kent and Essex Sea Fisheries Committee considered that the selection of 3 Strategic Areas had disregarded their fishery importance. It recommended selection of 'brown field' sites and early consultation between developers and fishery organisations before bid or consent applications were made and EIAs prepared. It also recommended that wind farm configurations and management regimes should allow as many fishing activities as possible. It pointed out that Thames estuary fisheries at serious risk because the shallow areas and sandbanks likely to be favoured by developers were the areas that, in the main, were fished most heavily.
- Margate Fishermen's Association pointed out that compensation of displaced fishermen would be required.
- The North Eastern Sea Fisheries Committee on the other hand counselled caution on the issue of compensation to fishermen because of the impacts of greater fishing effort that had occurred from upgrading of gear following compensation. It stated that opportunities to improve habitats and species abundance should be pursued. It also commented that fisheries information was "woefully inaccurate and inadequate "and that major fisheries had been omitted because of the reliance on ICES data (which excludes boats below 10m in length).
- Thanet Fishermen argued that fisheries data was not comprehensive; that management, although welcomed, should be achieved through negotiation and cooperation of the fishermen, not through the fishermen being denied access to the fishing grounds because of wind-farm development; that the risk estimate for impacts on fisheries and fishermen was not correct; and that at the conclusions on electro-magnetic fields were also not correct. Further research should be made into the effects of electromagnetic fields, vibration and noise on fish species.
- Dr Ladyman MP (on behalf of South Thanet fishermen) expressed concern about loss of access to fishing areas; and that fish may leave traditional fishing beds.

DTI Response

The Department's decision to exclude from Round 2 a coastal strip of minimum width 8km but extending to 13km in areas of particular sensitivity recognises the potential impact of wind farm development on inshore fishing as well as other factors such as seascape, disturbance of birds and recreational activities.

The Round 2 announcement encourages developers, before submitting tenders for Round 2 sites, to discuss the impact of their proposals on fishing with the local Sea Fisheries Committee. As stated in the announcement, the Tender Assessment Panel will seek advice from DEFRA and CEFAS on the cumulative impact of development proposals on the fishing industry.

Site-specific conflicts and any issues of compensation will be for individual developers to address with representatives of local fishing interests when drawing up detailed project plans and applications for development consent. There is no statutory basis for compensation to be paid to fishermen affected by wind farm developments, but developers taking forward current projects have shown that they are prepared to pay compensation on the basis of justified claims which are supported by information confirming the nature of the losses sustained.

The Maritime & Coastguard Agency has recently developed guidance on navigational safety issues in the vicinity of wind farms (to be published shortly on www.mcga.gov.uk). The guidance indicates the extent to which safety zones that exclude fishing activities are likely to be established around wind farm structures, unless there are specific local factors justifying a different approach on specific sites.

There is no basis as yet for the view that fish will leave traditional fishing beds.

Additional fisheries data has been incorporated in the final published version of the Environmental Report.

5. Navigation

Several respondents commented on navigation issues:

- The Maritime and Coastguard Agency (MCA) argued that the section 'Operational phase: Safety'
 (9.13.2.1) did not address safety issues adequately, and that generally the study had missed the
 opportunity to consider and generate generic guidelines dealing with potential risks to navigation
 associated with offshore wind power.
- The MCA and Mr G Plant (barrister) commented that the COAST database used in the Report, for navigation route determination, had limitations, and that Figure 19 might need to be revised to take account of data limitations. Mr Plant was concerned that the implications of using ~1km spacing distance, in terms of coalescence of safety zones and effective closing of large areas of the sea, had not been dealt with adequately.
- The Royal Yachting Association made the following points:
 - 1. There was a lack of information on recreational boating and the sections of the Report affected by this data lack should be highlighted. Without necessary baseline data it was difficult to identify areas with low constraints.
 - 2. The allocation of risk scores to impacts on recreational navigation was incorrect (alternatives provided with justifications).
 - 3. Further research was needed on use of the Strategic Areas for recreational navigation. The constraints map could be misleading and should not be used as a basis for decision-making.
 - 4. Safety issues for sea users were not so well researched as other issues such as seascape implications.
- Trinity House (THLS) stated that wind farms should not be allowed to encroach on existing marked channels, and that 'Safety Clearways', based on traffic surveys, should be established in which no wind farms be allowed to locate. It was concerned
 - 1. that Figures 15 and 19 (traffic) might not be based on comprehensive and reliable data (they did not include recreational and fishing vessel movements).
 - 2. that adequate attention might not have been paid to differing type of traffic and cargoes in the risk-based analysis.
 - that cumulative impacts of wind farms on sea-bed stability especially in the Wash and Thames estuary might affect position and depth of navigable channels. This needed more attention in the Report or additional studies.

It recommended

- 1. that individual developers should consult with THLS and MCA on navigational issues prior to bidding for a potential site.
- 2. that MCA assist with clarification of paragraph 7.1.

DTI Response

The Department's decision to exclude from Round 2 a coastal strip of minimum width 8km but extending to 13km in areas of particular sensitivity recognises the potential impact of wind farm development on recreational boating in inshore waters.

So far as the impact on navigation for commercial shipping and other vessels generally is concerned, developers are being encouraged to discuss the impact of their proposals with the Maritime and

Coastguard Agency before submitting tenders for Round 2 sites. As stated in the Round 2 announcement, the cumulative impact of all site bids on navigation will be considered by the Tender Assessment Panel.

The MCA has recently developed guidance (to be published shortly on www.mcga.gov.uk) which addresses navigational safety issues in the vicinity of wind farms.

6. Taking forward the SEA

A large number of points were made concerning issues that will need to be addressed as the SEA programme is taken forward. Many correspondents pointed to data gaps and weaknesses. A number of respondents (including the JNCC, Marine Conservation Society, RSPB, Scottish Natural Heritage, the Whale & Dolphin Conservation Society, and the British Wind Energy Association) also made the point that the issue of cumulative impact had not been addressed in enough depth and detail.

General comments relevant to future management of the SEA programme included the following:

- The Countryside Council for Wales considered that the management framework [for taking
 forward the SEA] did not go far enough nor was it specific enough in identifying the work required
 and responsibility for it. It was essential that the additional studies listed should be more specific,
 should state who would be responsible for them, and also set some timescales for achieving the
 data collection.
- JNCC considered that an adaptive and learning management framework needed to be adopted by DTI. It was important that the following particular impacts were fully considered when determining areas for licence:
 - 1. Potential effects including cumulative impacts for sediment processes especially from larger wind farms offshore:
 - 2. Potential effects including cumulative impacts for conservation sites, biodiversity habitats and species:
 - 3. Potential effects including cumulative impacts for marine mammals;
 - 4. Potential effects on birds including cumulative (throughout the UK and wider) considering collision risk, displacement, disturbance and barrier.
- The RSPB stated that there needed to be an adaptive framework for environmental management with targeted research and issue of 'best practice' guidance documents. They commented that
 - 1. The absence of recommendations to DTI on the most appropriate strategic plan for Round 2 licensing was a major weakness in the SEA
 - 2. There were substantial and significant data gaps and weaknesses
 - 3. There were too many uncertainties (partially due to the tight timescale) for the Report to provide a useful basis for DTI decisions this particularly applied to the section on 'Cumulative' impacts)
 - 4. The method for allocating of risk scores had some weaknesses and should be receptor based rather than by impact type.
- The Marine Conservation Society stated that key weaknesses and unresolved issues were
 - 1. Data: the numerous data gaps or reliance on partial datasets, in the section of the Environmental Report entitled 'Environmental Situation' prevented the consultants coming to firm conclusions and recommendations that reduced the validity of the SEA
 - 2. Lack of consideration of alternatives to the 3 Strategic Areas
 - 3. Location: the question of where the next round of wind farms should be placed had still not been answered
 - 4. Cumulative impacts: the issue of cumulative and combined impacts of numerous wind farms and other developments in the marine environment was not addressed in enough depth and detail

- 5. The Environmental Report gave the impression that socio-economic activities and infrastructure were serious constraints for windfarms, but valuable habitats and species were not.
- Scottish Natural Heritage commented that there was no mention of institutional responsibility for
 progressing the work to fill data gaps or for managing and sharing the data produced; and was
 disappointed that the cumulative impact discussion did not deal with the combined impacts of
 both onshore and offshore renewables especially with regard to the shoreline.
- The British Wind Energy Association said that it would like to see consideration given to the development of a central data register for offshore wind. It also commented that
 - 1. Analysis of cumulative impacts was not comprehensive. Too often conclusions on the environmental affects of offshore wind farms were drawn in isolation of the impacts of all other marine and onshore users.
 - 2. Sections dealing with 'socio-economic' impacts should be expanded.
 - 3. The ranking system was a useful "first step", but urgently required additional work.
- National Wind Power (developer) levelled the following criticisms against the Environmental Report:
 - 1. The SEA was "...significantly bounded by use of existing limited data, a very comprised timescale and avoidance of some key aspects/constraints that influenced the selection and consent ability of sites, e. g. those constraints imposed by MoD or CAA".
 - There was too much emphasis on 'vertical' as opposed to 'horizontal' dimensions of constraints.
 - 3. Insufficient attention was paid to current actions of other seabed users and to affect on helicopter aviation.
 - 4. Cumulative impact material should have been presented within the body of the text and not separately and the English Nature definition of 'cumulative' impacts should have been used.
- TOTAL (developer) commented that
 - 1. Future SEAs should not only cover additional areas of sea, but alternative scenarios in the existing Strategic Areas (including linkages with other generating options).
 - 2. It was disappointing that there had been no apparent MoD input into the SEA process to date.
 - 3. It was premature to make recommendations for the use of AC cables to minimise electromagnetic effects prior to the outcome of ongoing studies.
 - 4. It would also be helpful for further consideration to be given to climate change, changes in sea an estuarine pollution levels, and changes in fishing effort.
 - 5. PEXAs content needed to be checked and reference was needed to possible effects on the air defence radar network.

More specific comments included the following:

- Dr Ladyman MP (on behalf of South Thanet fishermen) expressed concern that skate might be seriously affected by electro-magnetic fields. The Margate Fishermen's Association made a similar point. Dr Ladyman suggested that the Goodwin sands should be used to the maximum to accommodate wind farms as they were not fishing beds and that the currently "planned" small wind farms should be monitored for effect on fish and fisheries and the results evaluated before larger wind farms were approved.
- Kent County Council believed that there should be greater recognition to the potential for cogeneration projects (mix of renewable technologies).
- The Natural Environmental Research Council made a number of detailed criticisms of the Environmental Report. With regard to marine mammals, the Council suggested that information provided was less than authoritative because of the reliance on secondary sources. It argued that the impact on seals needed to be examined more closely with the most recent on data on

occurrences etc, and that the barrier effects on mammals were not considered to the extent required.

- The Whale & Dolphin Conservation Society stated that a full and definitive view on the effects of noise from wind turbines on cetaceans was lacking. It disagreed with the score of 1 (consequence) given to construction and vessel noise impacts on cetaceans, as there was insufficient evidence to reach such a conclusion. It argued that the limitations of 'scaling-up' noise impacts, from limited studies, should be expressed.
- Le Secretariat General de la Mer (France) suggested that synergies between wind farms and aquaculture and 'reserve' effects for ecosystems could be assessed.
- English Nature welcomed the recommendation in the Environmental Report for preparation of a 'best practice' guide.
- The Council for the Protection of Rural England stated that Government should establish a monitoring system for offshore wind farm development to help foster a more sustainable and higher performance 'industry' in the future.
- The Port of London Authority pointed out that no mention was made in the Environmental Report of former sewage dumping sites.

DTI Response

The DTI will continue its programme of SEA to help guide policy and planning decisions for future site leasing rounds. Issues such as the above will be addressed through this ongoing programme. Near term actions include:-

A strategic review of all UK marine renewable energy resources (whether or not commercial technology presently exists to harness it) to plan the programme of future rounds

A series of studies and surveys required to inform regional SEAs

The systematic compilation of information on the effects of wind farms so that it is available to guide debate and decisions in the future.

7. Issued to be addressed when sites are Leased

A number of comments were made on issues that will need to be addressed by developers when bidding for site leases or in EIAs.

- English Nature pointed out that further discussion was required concerning issues such as 'safety'
 zones, decommissioning, relative impacts of a few versus a greater number of smaller cables and
 the role of recovery of the marine environment by wind farms.
- JNCC argued that DTI should insist that all EIAs consider effects of noise and vibration on marine mammals using up-to-date information.
- Kent County Council wished to see safeguarding of commercial shipping, fishing and recreation in the development of detailed proposals.
- London Array (developer) pointed out that levels of constraint in the SEA report could well conflict with findings of individual site EIAs, possibly leading to disputes in the validity of data.
- The Council for the Protection of Rural England argued that the implications of abandonment of structures had not been considered, and that Government should address the issue of securing funds to finance decommissioning and restoration once turbines became redundant and in advance of any further offshore wind development.

Renewables North West was concerned that a number of constraints had been treated as simply
maximum constraints (e.g. every record on the National Monuments Record was a maximum
constraint) and therefore as 'no go' areas without sufficient attention to site specific issues. It also
argued that evidence from existing wind farms in UK/else where did not support bird strikes as
being a major issue.

DTI Response

The Government intends to bring forward legislation as soon as possible which among other things will provide new powers to create safety zones around offshore wind farms, and to require decommissioning programmes to be established.

The site-specific impact of developments on the marine environment is required to be assessed in individual EIAs, which are taken into account at the development consent stage, when decisions are taken on the best evidence available at the time. Similarly the impact of developments on local fishing, commercial shipping, and other marine users are also taken into account at the development consent stage.

8. Other Points Raised

a) Marine spatial planning and the designation of marine protected areas

Comments were made as follows:

- The Marine Conservation Society stated that DTI should consult with DEFRA to progress marine spatial planning as a marine management tool for each regional sea.
- The RSPB commented that as a matter of priority the Government must expedite the process for designating marine protected areas; and that some form of marine spatial planning was now necessary to anticipate and avoid cumulative or long-term impacts which are unsustainable.
- Norfolk County Council stated that DTI should exclude in the second, and subsequent, licensing rounds areas with international nature conservation designations (such as SSSIs, SPAs, and Ramsar sites).
- The Countryside Council for Wales considered that the report was not clear or consistent on the ongoing work to identify offshore SACs and marine SPAs and the implications of the Habitats Directive for the next round of wind farm development.

DTI Response

The Government is conducting a general review of the marine consenting process, in which DTI is participating along with other Government Departments.

Sites which are potentially designatable as protected areas have not been excluded from the areas which are being offered to developers under Round 2, unless they fall with the excluded coastal strip. However developers will need to take account of nature conservation issues in preparing their EIAs and are advised to seek early consultation with the relevant bodies.

b) Scottish issues

Scottish Natural Heritage suggested that coverage of Scottish legal, regulatory and policy framework and baseline environmental data was deficient.

DTI Response

DTI will work closely with the Scottish Executive in taking forward the offshore wind programme to ensure that Scottish issues are dealt with properly.

c) Flexibility for developers

LE Group argued that Government should allow developers the maximum level of flexibility on issues such as size/number of turbines; and that rather than fixed leasing, a rolling lease process was preferred allowing companies to pursue opportunities at a time most suited to their commercial considerations whilst continuing to allow cumulative environmental effects to be adequately assessed.

DTI Response

These are matters for lease conditions and the design of rounds rather than issues arising from the Environment Report.

d) Corrections to the Environmental Report

A number of corrections reported by respondents have been incorporated in the final version of the Environmental Report

9. List of respondents

- * Council for National Parks (J Avis, CNP policy team)
- * Countryside Agency (R Bull)
- * Countryside Council for Wales (Dr M Hill, Head Maritime & Earth Sciences)
- * Cumbria Sea Fisheries Committee (C E Smitham, Administrator/Support Officer)
- * Dr S Ladyman, MP for South Thanet (on behalf of fishermen of South Thanet)
- * Dumfries & Galloway Council (A Speedie, Planning and Environment)
- * Eastern Seas Fisheries Joint Committee (J C Stoutt, Marine Environment Officer)
- * English Heritage (A Lawrence, Archaeologist (Maritime))
- * English Nature (V Copley, Marine Operations Advisor)
- * G Plant
- * Joint Nature Conservation Committee (Z Crutchfield, Senior Offshore Advisor)
- * Kent and Essex Sea Fisheries Committee (J W Stroud, Chief Fisheries Officer)
- * Kent County Council (N Hilkene, Development Planner)
- * LE Group (D Linford, Head of Regulation)
- * London Array (R Rigg, Project Manager)
- * Margate Fishermens Association (M W Jackson, Secretary)
- * Marine Conservation Society (M Moore)
- * Maritime & Coastguard Agency (C Brown)
- * Maritime & Coastguard Agency (Captain P Wilkins)
- * National Grid Transco (S Knight-Gregson, Senior Specialist, Land and Development Group)
- * National Wind Power (N Birch, Head of Offshore Development)
- * Natural Environment Research Council (No name provided)
- * Norfolk County Council (S Faulkner, Planning)
- * North Eastern Sea Fisheries Committee (G Bartlett, Environment Officer)
- * Powergen Renewables Offshore Wind Ltd (D Farrier, Development Manager)
- * Renewables Northwest (J Carter, General Manager)
- * Royal Society for the Protection of Birds (S Thompson, Marine Policy Officer)
- * Royal Yachting Association (S Tomson, Coastal Planning and Environmental Officer)
- * Scottish Natural Heritage (A J Downie, Advisory Officer Maritime Group)
- * Sécretariat Général de la Mer, France (Christophe Le Visage, Chargé de mission)
- * Thanet Fishermens Association (T H Brown, secretary)
- * The British Wind Energy Association (J Glennie, Head of Offshore Renewables)
- * The Council for the Protection of Rural England (CPRE) (J Hatcher, Senior Natural Resources Campaigner)
- * The Port of London Authority (J Trimmer, Head of Planning and Partnerships)
- * TOTAL (P Abbott, TOTAL Exploration and Production UK plc)
- * Trinity House Lighthouse Service (Captain D C Glass, Director of Navigational Requirements)
- * UK Cable Protection Committee (UKCPC) (C Fenn, UKCPC Secretary)
- * Whale and Dolphin Conservation Society (WDCS) (J Clark, UK Policy Officer)
- * Wirral Borough Council (J Entwistle, Planning Officer)