

**Summary of
Relevant Representation of ScottishPower Renewables in respect of A30 Chiverton Cross to
Carland Cross DCO**

1. Registration as Interested Party

- 1.1 ScottishPower Renewables (SPR) wishes to register as an Interested Party for the Examination of the Development Consent Order (DCO) application submitted by Highways England for the A30 Chiverton Cross to Carland Cross highway improvement scheme (the "A30 Scheme") as the A30 Scheme is likely to significantly impact SPR's operational Carland Cross Windfarm (the "Windfarm").

2. Objection

- 2.1 Please treat this objection as SPR's Relevant Representation in respect of the DCO application for the A30 Scheme.

3. Introduction

- 3.1 The Windfarm consists of 10 turbines across the Eastern Array and Western Array, with access taken from the Carland Cross roundabout and Boxheater junction respectively.
- 3.2 SPR is keen to ensure that both the Eastern and Western Arrays can still be accessed safely and efficiently by abnormal loads through the proposed new junction configuration. Abnormal load and emergency vehicle access must be maintained at all times.
- 3.3 SPR and its advisors, Systra, have undertaken a detailed technical review of the proposals to assess the potential impacts on the Windfarm. Technical and operational concerns remain.
- 3.4 In summary these are:
- 3.4.1 Restriction on access to the Windfarm during the construction and operation of the A30 Scheme; and
 - 3.4.2 The requirement to divert Windfarm infrastructure.

4. Access to and from the Windfarm

Issue 1 – Design of Chybucca Junction

- 4.1 Abnormal loads, such as blade transporters, will require to over-run the central island of the new roundabout.

Issues 2 and 3 – Vertical Alignment through the new Carland Cross Interchange and new Access Roads Alignments

- 4.2 SPR is concerned that transporters will "ground out" as a result of the proposed northern access road having a K-value (vertical curve measure) of 3.5. A K-value of 4 is stated in the turbine manufacturer's guidelines for transportation to prevent grounding out.
- 4.3 Highways England has not demonstrated that it is possible for abnormal load vehicles to access the Windfarm from the new Carland Cross Interchange.

Issues 4 and 5 – Carland Cross to the Windfarm Tie-in

- 4.4 Highways England has tied into an adjacent estate road rather than the main windfarm access road. The estate road is not suitable for transporting turbine components.

Issue 6 - Junction Spacing Between Carland Cross Interchange and Internal Junctions

- 4.5 DCO drawing HA551502 Rev C02 indicates there will be approximately 20m less space between the new roundabout and access junctions than currently exist. A blade transport vehicle is approximately 55m and therefore it is possible the blade could hang over the roundabout and public road.

Issue 7 – Width of roads

- 4.6 Highways England has designed the Windfarm roads to 4m width however they are required to be a minimum of 5m width (not including verges) with wider widths on bends to facilitate abnormal load vehicle movements.

Issue 8 – Decommissioning

- 4.7 Suitable areas are required to accommodate over-sail etc from vehicles transporting turbine parts. The submitted DCO drawings do not appear to have considered this.

Issues 9 to 12 – Access during construction

- 4.8 SPR requires daily access to the Windfarm for operation and health and safety reasons and it is not clear whether this can be achieved during the construction of the A30 Scheme. Further, access should always be possible for abnormal loads and emergency services.

5. Diversion of Windfarm Infrastructure

Issue 13 – Design of Cable Routes and Access Track Drainage

- 5.1 Cables connecting the Western Array will require to be disconnected and alternative cables laid. This could result in a considerable outage. Appropriate consideration does not appear to have been given to this potentially very significant impact within the DCO application.
- 5.2 No design has been provided for the diversion of the Carland Cross windfarm power cables.
- 5.3 There are issues regarding fencing and drainage which have not been addressed.

6. Consultation

Issue 14 – Inadequate Consultation

- 6.1 The Consultation Report states on Page 97 that *“Engagement has been ongoing with the operators of the wind farm since July 2017 to understand any potential impact of the wind farm on the proposed scheme and to ensure that operations are not affected by its construction”*.
- 6.2 Almost all design concerns have been ignored and the drawings submitted as part of the DCO submission are almost identical to the original scheme drawings. SPR does not believe that the consultation has been meaningful.

7. Summary of Impacts

- 7.1 It is anticipated that the A30 Scheme will have significant impacts on the Windfarm, including:
- 7.1.1 Restriction on access to the Windfarm during the construction and operation of the A30 Scheme; and
- 7.1.2 Diversion of Windfarm infrastructure.
- 7.2 During the construction and operation of the A30 scheme, access to the Windfarm may be restricted preventing required vehicular access.
- 7.3 Where replacement parts cannot be delivered to the site, turbines may have to be switched off.
- 7.4 Where there is an emergency situation which requires the entire Windfarm to be shutdown, access will be essential to determine and repair the issue.
- 7.5 Where access cannot be gained, this could result in the Windfarm being shut down for unacceptable periods which will result in substantial losses to SPR.
- 7.6 During the construction of the A30 Scheme, the cables connecting the Western Array will require to be disconnected and alternative cables laid yet very little consideration has been given to this by Highways England and these works have the potential to result in an unacceptable outage of the Windfarm.