



NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

WRITTEN REPRESENTATIONS

Tidal Lagoon Swansea Bay Project

PINS REFERENCE: EN010049

NPT REFERENCE: P2014/0145

Planning Department
The Quays,
Brunel Way,
Port Talbot
SA11 2GG

Tidal Lagoon Swansea Bay Project

(NPT reference P2014/0145)

1. As with any significant infrastructure project which is the first of its type, especially when located within such a dynamic and varied environment such as this, there are likely to be significant levels of potential impacts, many of which will be difficult to identify, measure and evaluate. It is accepted that the submitted ES has attempted to identify and assess these potential impacts. However, the Authority is concerned about the extent of uncertainty that remains associated with certain aspects of the proposed development, particularly in relation to coastal processes, flood risk, impact upon the existing highway network and biodiversity.
2. It is acknowledged that while the full scope of some of these impacts are particularly difficult to assess and that some may remain unidentified, or that to some extent a degree of uncertainty may remain until the development has been begun, been completed or even in some situations in situ for some time, there are clearly issues that would and could have benefited from further survey and assessment, to help identify necessary monitoring and mitigation works that may be required during the course of construction and operation of the project.
3. The Authority considers that further surveying and modelling of the current situation, prior to the start of works would help to establish further baseline information, which would help to facilitate a better understanding of monitoring information once the development has begun.
4. The Authority certainly welcomes and encourages the obvious beneficial effects that the development would bring, particularly upon the tourism and recreational economies, as well as creating an alternative source of renewable energy. It also recognises the developer's significant attempts to wherever possible maximise those impacts. The Authority also, to some degree, understands the developers wish for a timely determination of their application and any associated requirements. However this cannot be at the expense of the environment or the community in which the development is to be located, especially when considering the period over which the development will be operating and potentially remaining in situ in perpetuity.

5. While much of the area's identity can be traced back to the heavy industry that brought a great deal of the development within the area, this has also been balanced against the outstanding and distinctive natural environment in which it is set. The project has a predicted life expectancy of around 120 years, with a possibility that the lagoon structure will remain in situ thereafter. As such, it is important that this development becomes as much a part of the environment and community in which it is set as possible. This can only be achieved through comprehensive monitoring of the impacts and activity and creative mitigation of any identified effects.
6. In addition to the above, it is acknowledged that the developers have identified a number of planning obligations which would help to alleviate some of the impacts upon the environment and local communities. These initiatives include such measures as transport provision, habitat creation and education initiatives such as educational information on Crymlyn Burrows SSSI, to inform and educate visitors of their potential impact upon the environment that they are visiting and thereby helping to avoid some of the effects. These are direct mitigation for identifiable adverse impacts that the development will cause. It should be noted that many of these initiatives also have beneficial effects for the developers such as improving and increasing the profile of the development as a sustainable source of renewable energy. This is of particular importance considering the similar developments that the project team wish to undertake around Wales and the negative public perceptions that are currently associated with other forms of alternative energy such as fracking and on-shore wind farms.
7. However, there are many impacts upon the community that cannot be so easily identified and potentially mitigated. These include the impact upon the visual amenity of the area, traffic delays caused during construction and then later by major events held at the lagoon. The developers have made some initial suggestions regarding the potential creation of a reduced energy traffic scheme, but details are very thin.
8. The Welsh Government has placed significant emphasis on the voluntary payment of community benefits for energy projects, including the recent launch of the 'Register of Community and Economic Benefits' in respect of onshore wind farms. This includes an online statement that "Energy offers opportunities to bring wealth and benefits to Wales, helping protect the future of our communities. We, the Welsh Government, want Wales' energy developments to involve communities and to help people understand the benefits they bring".

9. Within this context, the Authority is extremely disappointed at the developer's refusal to consider the creation of a community benefits scheme, which would see a contribution per MW contributed directly towards the communities affected by the proposal. This is a well-established principle for energy generation and mineral extraction developments, helping to offset the harm caused, while also creating essential links between developments and the communities in which they are located. The Authority considers that this is a vital initiative that is currently missing from the proposal, especially given the extremely long term potential for the lagoon and its impacts to remain within this community, and while outside of the planning process consider the developer should be reminded of his obligations to the communities directly affected by the development.