



Seran Davies

Cyfoeth Naturiol Cymru / Natural Resources Wales
Chester Rd, Buckley,
Flintshire
CH7 3AJ

Case number: ORML2170

Our ref: NFFO/ 3862/MJC

Wednesday 12th October, 2022

Dear Seran,

Re: ORML2170 Project Erebus Floating Offshore Wind Farm

Thank you for this opportunity to reply on the response from Blue Gen Wind to our original comments on this project.

Taking the points made in turn:

Exclusion of fishing

As indicated by our statement “impact that should in no way be considered minor”, we disagree with the view that this impact is not of significance. Any reduction in fishing opportunity is a material loss for a fishing business that is already operating in this area. To argue that fishing also takes place in other locations does not change this. Fish and shellfish are not evenly spread throughout ICES rectangles. Some areas are productive, others are not. It is very unlikely that there are any productive locations in this region that are not already being fished. Particularly for those vessels fishing for non-mobile species, loss of access to fishing grounds is very likely to equate to a permanent loss of income. We stand by our view that the magnitude of this impact on those businesses should not be considered minor.

Risk of snagging

Regular cable surveys, retention of a dedicated FLO and communication of ‘as-laid’ co-ordinates are consistent with best practice and we are happy to agree that the developer is taking reasonable steps to mitigate the risk of fishing gear snagging on cables.

Economic impact

We can say little here other than to reiterate that, for the businesses that lose income from this development, the impact will not be minor.

Displacement

The Crown Estate has made no secret of the fact that it has been in the process of seeking to lease around 1,500 km² of ground in the Celtic Sea for floating wind farm development since 2021. When making claims about the alternative catching opportunities for fishermen displaced by the Erebus project, this should not be ignored. It is already perfectly clear that the effect of these projects – each

of which will entail complete exclusion of fishing activity – will be significant for many fishing businesses. We would wish to draw the attention of planning authorities to the increasing spatial squeeze in the Celtic Sea region. While the precise locations and names of the various turbine arrays may not yet be known, their cumulative impact is not in doubt.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Mike Cohen', with a stylized, overlapping flourish at the end.

Mike Cohen
Deputy Chief Executive