

Seran Davies
Marine Licensing Team
Permitting Services
Natural Resources Wales

By email

13 October 2022

Dear Seran

ORML2170 Project Erebus Floating Offshore Wind Farm

Thank you for your letter dated 31 August and the invitation to view and comment on the further information submitted by BlueGem Wind.

Unfortunately we do not have the capacity currently to respond in full to all the supplementary information provided, but please see comments on the impacts of cabling and Outline Environmental Monitoring Plan attached.

WTSWW welcome the production of the OMEP and the commitment to consult with statutory nature conservation bodies (SNCBs), such as NRW and JNCC, and other key stakeholders, including environmental non-governmental organisations (eNGOs) in the production of a final document following the award of any marine license.

The internationally important seabird islands of Skomer and Skokholm are centres of scientific excellence for monitoring and research. Seabird monitoring on Skomer commenced in 1959 and has continued uninterrupted to date and on Skokholm, the first Bird Observatory in the UK, since 1976. The Wildlife Trust are uniquely positioned to deliver seabird monitoring at these colonies and to facilitate research by third parties, all who require use of our accommodation and facilities.

We look forward to continued engagement with the developer on this area of work.

Best wishes



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Head of Islands and Marine



Tania Davey
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The Wildlife Trusts



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TWT comments on BlueGem response to cabling impact concerns.

The Wildlife Trusts opposed progression of this project due to a lack of compensation for cable protection impacts on Pembrokeshire Marine SAC

We would like to respond further on this point:

A precedent has been set through decision making for offshore wind farms “that habitats which are subjected to cable protection, will experience the effects of habitat loss, habitat modification and changes in epifauna communities. As the cable protection will be in place for 35 years, this is considered a long-term effect. Furthermore, cable protection measures are likely to impede the restoration of the Annex 1 habitats for the duration that they are in place. These habitats are currently in an unfavourable condition, and delays to their restoration would be contrary to the Conservation Objectives for the SAC. The Secretary of State concludes that adverse impacts on Annex I feature ‘sandbanks slightly covered by sea water all the time’ from the Development alone and in combination with other projects and plans cannot be ruled out” [Hornsea Three decision letter](#) – since this the same conclusion has applied to Norfolk Vanguard and Boreas. The conclusions for these planning applications directly apply to the cable installation within Pembrokeshire Marine SAC – this site is already in unfavourable condition, the cabling works will cause a loss of habitat and therefore impede recovery of the SAC. Further information can be found [here](#).

WTSWW comments on Project Erebus Outline Environmental Monitoring Plan

4.6.2. In-Principle Monitoring Proposals

“..monitoring of key bird species is proposed to be undertaken in the operational phase of the Project.”

Can you confirm that ‘operational phase’ includes construction and decommissioning phases? The risk from several elements including ‘attraction’ could be increased during construction for instance (when additional vessels and lighting may be required on-site.)

We would like to see population/colony counts included in the bullet point list of elements on which monitoring will focus. The current wording “*Further monitoring methods, such as bird tagging or colony counts may also be used*” needs to be firmed up with a solid commitment.

We welcome the option to use radar techniques to facilitate surveillance at night and in poor weather conditions when DAS is not suitable. However there is no firm commitment to using such an alternative in the current text. We hope this commitment will be made clear in the final EMS. Shown in red below:

Proposed monitoring of ornithological receptors will focus on the following elements:

- *Potential collisions between birds and WTGs;*

- *Avoidance behaviour of birds around WTGs;*
- *Flight height distributions around WTGs;*
- *Species abundance in proximity to WTGs: WTG mounted cameras to validate DAS data*
- *Effects on population counts, population distribution, survival and productivity of regional breeding colonies; and*
- *Attraction to floating platforms and associated service and installation vessels*

We seek recognition in monitoring project design, that monitoring demographic parameters such as adult survival requires an annual commitment in order to produce estimates for populations and to assess long term trends.