yn rhoi cartref i fyd natur giving nature a home

RSPB Cymru

Seran Davies
Marine Licensing
Natural Resources Wales

7th July 2022

By email only to:
Marinelicensing@naturalresourceswales.gov.uk

Your Ref: ORML2170
Dear Seran

MARINE AND COASTAL ACCESS ACT 2009: PART 4 MARINE LICENSING
ORML2170 Project Erebus Floating Offshore Wind Farm

Thank you for consulting the RSPB on the above.

The proposal is for a Test and Demonstration Floating Wind Farm project to be located in a highly sensitive marine environment. We understand that this project has been granted a lease as a Test and Demonstration project for floating offshore wind. The aim of this proposal is to enable a small scale Floating Offshore Wind deployment which will seek to capture data both in terms of the technology and potential impacts. This data can then be utilised in the future to help determine whether there is scope for further, large scale, commercial floating offshore wind farms in the Celtic Sea. Therefore, it is important that this project not only delivers data on the commercial viability of the technology but vital that data and evidence on ecological impacts on birds, mammals and the wider marine ecosystem is captured. However, whilst we appreciate the scale of this project is smaller than a commercial scale windfarm, and we recognise the importance of testing new technology, it should be noted that the precautionary principle needs to underpin any decision.

ScotWind recently published an article which states that each flow turbine could utilise as much as 1 sq.km of wet storage prior to deployment and that depending on deployment parameters and weather conditions they may be stored in these wet storage areas for some time (up to 2 years). The article goes on to state that:

> *Whilst for any individual turbine the duration of containment in wet storage areas may be relatively limited, the duration in which a given wet storage area may contain one or more turbines may be considerably larger; potentially one to two years throughout the duration of the construction period.*
>
> *The spatial extent of floating wind wet storage areas, although much smaller than the footprints of associated offshore floating wind farm arrays, may be considerable. For example, the footprint of a wet storage area designed to hold up to six turbines, each separated by 1 km, may be in the region of 5 km2 when fully occupied.*
>
> *This presence of assembled large turbines in coastal environments during the temporal and spatial scales described above has the potential to result in adverse impacts upon ornithological receptors within those environments, principally as a consequence of disturbance and displacement effects.*

Wet storage areas would ideally be located in sheltered, coastal waters, outside of areas strongly influenced by tidal currents and ideally in proximity to existing assembly ports and offshore array areas.

Under The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 Schedule 4 states that the construction and operational phases need to be included in the land use requirements of the EIA:

1. *A description of the development, including in particular—*

(a)a description of the location of the development;

(b)a description of the physical characteristics of the whole development, including where relevant, requisite demolition works and the land use requirements during the construction and operational phases;

Section 5 of Sch.4 goes on to state that the likely significant effects on the environment of the development during construction also needs to be assessed and not least to ensure that cumulative impacts and the risks from accidents (and in our opinion the risks associated with displacement of activities) to the environment are included:

5.*—(1) A description of the likely significant effects of the development on the environment resulting from, amongst other things—*

(a)the construction and existence of the development, including, where relevant, demolition works;

(b)the use of natural resources, in particular, land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c)the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances and the disposal and recovery of waste;

(d)the risks to human health, cultural heritage or the environment (for example, due to accidents and disasters);

(e)the cumulation of effects with other existing and approved developments, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected and the use of natural resources;

(f)the impact of the development on climate (for example, the nature and magnitude of greenhouse gas emissions) and the vulnerability of the development to climate change;

The Environmental Statement has only assessed impact based on the 'construction' of the cabling and associated works where cable landfall occurs at West Angle Bay. Whilst it is implied within the Environmental Statement through the use of Pembrokeshire and Wales socio-economic data that the Floating turbines and platforms will be constructed in and around Pembrokeshire and Milford Haven it is not explicit that this is the case. The employment opportunities cited within the Planning Statement also imply this.

If this is the case, and the construction of the platforms and turbines is to occur in and around Pembrokeshire, it is vitally important that we have a full understanding of the construction process and the wet storage aspect of the project, as the impacts on ecology and the marine landscape could be significant. This is equally important given there is a high probability of displacement of existing activities in and around Welsh ports given that none of the ports in the vicinity currently undertake this work. Therefore, the probability of displacement of current activities from these ports may impact on environmentally sensitive locations. However, if it is confirmed by the applicant that there are no ports in Wales that are currently able to deliver this project, the issue of where the construction is to take place and potential environmental impacts that this development will have in that area needs to be considered. If this is the case the ES and planning statement should also be revised in terms of socio and econ benefits to the area that are stated in terms of employment opportunities from construction.

As this is a test and demonstration site, it should be testing and demonstrating all of the potential impacts that are probable and not exclude the construction and maintenance impacts associated with the semi-submersible platform, materials and the turbine itself along with any requisite wet storage area in the vicinity of the construction port. As ***a test site*** these are fundamental issues that need to be assessed so that we see true impacts at this scale to enable the potential future upscaling of deployment to be assessed comprehensively in terms of cumulative and in combination effects.

We understand that the applicant is currently awaiting a Ports Study which will ascertain which port(s) will be used for the construction and maintenance of the floating turbines. Until this report has been released and the applicant can confirm the port to be used, we are unable to ascertain the significance of this project in terms of impact on ornithology and the marine ecosystem. I would suggest similarly, this is the case for landscape impact and socio-economic impact. In the meantime, it would be helpful to know which port the applicant has based their construction methods, deployment / transport etc for their cost analysis and viability assessments given para 6.31 of their Planning Statement states:

Paragraph 1.1.10 of the Assessment confirms that the employment and activity generated by the Project will increase economic activity in the local economy (as measured by GVA impact). The Assessment confirms that the following key benefits will be derived for the Project:

- *715 direct (gross) jobs created from the construction phase;*
- *818 indirect / induced jobs created during the construction phase*
- *An additional £117.7m direct GVA during construction*
- *146 direct (gross) jobs created during the operation phase*
- *283 indirect / induced jobs created during the operational phase; and*
- *An additional £104.9m direct GVA during construction*

We therefore raise a further objection to both the Marine Licence application and the Electricity Act Application on the grounds that the environmental impact of the proposed development has not been considered in full in terms of construction, operational maintenance and decommissioning.

We reserve the right to make further comments in future should new information be submitted in relation to the technical data or an outline EMMP. If you require further information or clarification in relation to any of the issues raised, please do not hesitate to contact me.

Yours faithfully,

Simon Hugheston-Roberts
Conservation Officer (Casework)

cc. PEDW

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