

Eneco Wind Park
Units 3 and 4 Athena Court
Athena Drive
Tachbrook Park
Warwick
Warwickshire
CV34 6RT

23 December 2011

Dear Sir/Madam

**Navitus Bay Offshore Wind Farm
Detailed Preliminary Environmental Information October 2011
RSPB Comments December 2011**

Please find attached the RSPB's response to the Navitus Bay Offshore Wind Farm Detailed Preliminary Environmental Information (*the PEI*). Our comments are set out in the attached appendix, in relation to both offshore and onshore elements of the proposal. In both instances these relate principally to the assessment of potential impacts on ornithological interests.

As a general point, the PEI is very concise, clearly greatly summarising the work that has been and continues to be undertaken. This brevity limits our ability to respond meaningfully and whilst acknowledging that the PEI only presents *interim* results of the Environmental Impact Assessment (EIA) work to date, we question whether the PEI enables adequate pre-application consultation, and consideration of the application under Section 42 of the Planning Act 2008 to be concluded.

We trust our comments are useful, and we look forward to continuing to engage in the consenting processes of the Navitus Bay Offshore Wind Farm. Please do not hesitate to contact me should you require any clarification or further information.

Yours sincerely



Renny Henderson
Conservation Officer

Appendix
Navitus Bay Offshore Wind Farm
Detailed Preliminary Environmental Information October 2011
RSPB Comments

The RSPB welcomes the PEIs attempt at summarising how assessments of the Navitus Bay Offshore Wind Farm’s impacts are being made or are planned to be made on a range of sensitive receptors. However, in dealing with potential impacts on receptors independently, the PEI does not address the critical inter-relationships between receptors that will in our view be key to understanding impacts.

For instance, whilst we note there has been considerable ornithological data collected, the PEI considers bird numbers and distribution very casually, it does not consider why birds are there, how birds are using the area, and how their use relates to the area’s physical and other biological characteristics, such as water depth, seabed habitat type, and relative densities of seabird prey in the benthic and marine species assessments. There is no consideration of upwellings and frontal systems in the PEI, which would help understanding of the areas of greatest biological productivity which are likely to be influencing seabirds’ use of the area. This will in our view be critical to understand why birds are in the area in order to determine/assess the proposal’s impacts on them and we consider that the proposal’s Environmental Impact Assessment will need to consider the interrelationships between receptors.

Reference	RSPB Comment
1.1.2 (p. 6)	<p>We note the PEI informs consultees of the ‘nature, scale, and location of the Project and in particular explain the environmental information available to Eneco to date’.</p> <p>We recognise that the PEI is an interim report of progress, much greater detail will be required within the ES for stakeholders to properly assess the proposal.</p>
1.1.3 (p.6)	<p>We note ‘information in this report represents the most accurate information available at the current time, based on up to date desk top research and a number of original field surveys’ and that the ES will include more environmental information.</p> <p>As above, we recognise that surveys continue.</p>
1.2.4 (p.8)	<p>We note that ‘it is understood that there are no other major projects (currently operational, in construction or with the benefit of planning consent or which are the subject of a planning application) that would materially affect the results of the EIA and therefore the assessment of cumulative effects or interaction with other projects is not currently proposed’.</p> <p>We are unclear as to the meaning of this text, given elsewhere mention is made of assessing cumulative effects including the implications of the</p>

	<p>Rampion Round 3 offshore wind farm.</p> <p>It is our opinion that the impacts of the proposal should be assessed both alone and in combination with other plans and projects, and that an assessment of cumulative effects should be carried out. This does appear to be Eneco's intended position (see below).</p>
1.2.4 (p.8)	We are pleased to note 'cumulative effects of the Project itself will, however, be considered'.
1.3 (p.8)	We note PMSS as one of the main contributors to the PEI. The RSPB met PMSS in 2010, and we are waiting for confirmation of a meeting to update us on ornithological matters.
1.4.4 (p.9)	<p>We note that 'the environmental issues and potential mitigation measures identified during the preparation of the PEI report will be further assessed and the likely significant environmental effects will be identified and assessed in the ES'.</p> <p>In advance of the ES production, we would wish to be updated as to the results of the ornithological assessment work undertaken. As referred to above, we await feedback from PMSS.</p>
2.1.3 (p.11)	<p>We note the selection of the Offshore Development Area outlined in Figure 2.1. We understand the choice of zone is a result of environmental, economic and engineering constraints, taking into account information gathered from stakeholders such as NE and MoD.</p> <p>We would expect the factors underpinning the choice of development area to be presented fully in the ES.</p>
2.1.4/2.1.5 (p.12) and 2.2 (p.13)	We note the general description of the location of the project and cable routes and connection points. We support the Rochdale Envelope approach to considering impacts associated with uncertainties over the exact nature of the proposal.
2.4.4 (p.18)	We note the comments on decommissioning. We support the production of a comprehensive decommissioning plan before construction as part of the consenting process. This plan needs to reflect the environmental implications of decommissioning.
3.1-3.2 (p.19)	<p>We note the summary conservation designations within paragraphs 3.1.1 to 3.1.2 for onshore and within 3.2.1 to 3.2.12 for offshore sites.</p> <p>Clearly implications of the proposal on the interest features associated with these designations will form a major part of the EIA.</p>
3.3.21 (p.19)	We note the approach to boat based surveys, and that boat surveys commenced in November 2009, for 2 years. We anticipate therefore that the findings of these surveys are currently being written up and analysed. The RSPB would be pleased to review this data as soon as possible, which we suggest should be written up as a free-standing ornithological report (OR), the findings of which being ultimately incorporated in the ES.
3.3.22 (p.19)	We note the preliminary observations concerning bird species

	<p>distribution and numbers.</p> <p>External scrutiny of the OR should reveal any necessity for further targeted surveys efforts during 2012 and potentially beyond. We stress that early consultation on the findings of the ornithological assessments would be extremely welcome.</p>
3.3.23-3.3.25 (p.35)	We note the tentative conclusions regarding bird distributions and potential vulnerability to the proposal. Given the absence of the completed OR, these findings currently can be given little weight.
3.3.27 (p.35)	We note the description of international/EU designated nature conservation sites which may be affected by the proposal. These appear comprehensive but we have not had an opportunity to assess whether this is a complete list. We would intend to review this in due course.
3.6 (p.48)	As mentioned above, it is imperative that the ES links receptors so that a complete picture of possible impacts can be made. Links between the proposals impacts on seabed geology (3.6.1), bathymetry (3.6.12) and hydrodynamics (3.6.13) for example need to be integrated to assess impacts on marine benthic life and hence fish populations and potentially bird populations.
4.1 (p.57)	We note the description of potential significant onshore effects, particularly with respect to onshore ecology and nature conservation. These will need to be fully addressed within the ES.
4.2 (p.61)	<p>This section discusses the potential significant offshore effects. It is brief, however as above, these impacts will require full treatment within the ES. The general range of effects is supported.</p> <p>The ability of these effects to act in combination or cumulatively needs to form part of the EIA.</p>
5.2 (p.74)	We support the statement that potential for in combination and cumulative effects for onshore effects will be made.
5.2.4 (p.77)	We support the inclusion, within the onshore ecological appraisal of a breeding bird survey and the possibility of a wintering bird survey (5.2.5). However it is unclear whether these are intentions or have actually been carried out. We would recommend both are necessary, but assume that they are being delayed until precise routings are available. We would be grateful for clarification and suggested survey methodologies.
6.1 (p.84)	We support the statement that the ES will provide details of potential cumulative and in combination effects and identify any potential trans-boundary effects.
6.3.3 (p.85)	<p>We note the reference to Habitats Regulations Assessment (HRA) and appropriate assessment in this paragraph. We consider HRA a critical element of this proposal given its scale, nature and proximity to internationally and European designated sites. A wide range of potential effects can be anticipated.</p> <p>Early presentation of the OR to relevant stakeholders will assist the</p>

	screening of the proposal against the Habitats and Species Regulations 2010.
6.3.4 (p.86)	We note the reference to two-year boat based surveys. The production of the OR will help determine the need for any continuation or additional targeted surveys. The OR and discussion thereon should take place before submission of the ES.
6.3.6 – 6.4.7 (pps. 86-88)	We generally support the measures outlined in these paragraphs. In 6.4.7 we would extend, as previously mentioned, the need to assess across operations wider than the study area alone, to include in particular other Round 3 proposals.
6.7 (p.91)	<p>We support the desk-based literature review and project specific survey data to inform the characterisation of the baseline and subsequent assessment. However, given we are addressing impacts of an offshore wind farm, in a location with relatively little existing data, it will be apparent that the critical component is the collection of appropriate field data and its analysis.</p> <p>The RSPB look forward to reviewing the data collected by the various measures outlined in section 6.7. As mentioned above, the OR may reveal deficiencies in the current data which may need to be addressed by further survey effort in 2012 and beyond.</p>
6.7.2 (p.91)	We support the objectives of the ornithological surveys.
6.7.7 (p.92)	We support the contents of this paragraph which recognises the links between possible effects may have affects on receptors, in this case birds. As stated above this linking of possible effects on receptors is a critical element of the EIA process.
8.4 (p.105)	We note in Table 8.1 details of surveys to be completed. These are given as boat based surveys, radar surveys (offshore) and onshore bird surveys. As stated above, we would be pleased to meet with PMSS, ideally early in the New Year to receive an update on all the ornithological work undertaken to date, or remaining to be to be completed.