

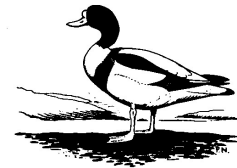
TEESSIDE OFFSHORE WIND FARM

COMMENTS BY THE TEESMOUTH BIRD CLUB ON THE APPROPRIATE ASSESSMENT PRODUCED BY THE DTI



VIEW OF TEES BAY FROM SOUTH GARE, REDCAR

Photo by Ted Parker



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1.0 INTRODUCTION

- 1.1 This report outlines the Teesmouth Bird Club's (TBC) comments on the 'Appropriate Assessment' for the Teesside Offshore Wind farm prepared by the DTI and issued to the Club on 21st December 2006.
- 1.2 The document was reviewed by the TBC's Conservation Sub-Committee on 9th January 2007 and the comments contained herein constitute the formal response of the Club.
- 1.3 Our response falls into 4 main headings:
- TBC's role in the Appropriate Assessment process.
 - Additional information provided by EDF Energy's Ornithological Consultant since the publication of the Environmental Statement.
 - Our response to the Appropriate Assessment.
 - A review of the TBC's formal objection to the development.
- 1.4 We understand that, at this stage, the Appropriate Assessment is concerned solely with the environmental impacts on sites with European designations (i.e. the SPA) and, as such, excludes an appraisal of the ornithological impacts outside such areas. Our concerns, however, are on a much broader front and include a range of other species not included in the Assessment process.

2.0 TBC'S ROLE IN THE APPROPRIATE ASSESSMENT

- 2.1 We are extremely disappointed that, despite being the leading authority on birds in the Cleveland area and its longest-standing nature conservation body, with a history spanning over half a century, the Club was not involved, or even consulted, during the preparation of the Appropriate Assessment. The Scottish Executive in its document 'Assessing Development Plans in Terms of the Need for Appropriate Assessment: Interim Guidance' states that:
- "Having formally consulted other stakeholders that may have information or expertise to assist the appropriate assessment, the Planning Authority should identify any impacts on European sites, actions which might avoid or mitigate these, or restrictions which would allow them to be undertaken."*
- Despite our knowledge and expertise, we have clearly not been considered a 'stakeholder' and, consequently, have been excluded from this process.
- 2.2 We are aware that a first draft of the document was issued to RSPB, English Nature and DeFRA on 17th July 2006 but the TBC was excluded from the circulation list. Whilst we are aware that the Club does not constitute a 'statutory consultee', we assumed that because of our detailed knowledge of the wind farm site and the Tees Estuary and the massive amount of data we supplied to the developer's consultants would have 'qualified' us for inclusion, as well as the RSPB.
- 2.3 We are concerned that DeFRA has apparently made no response to the Appropriate Assessment, despite the benefit of being consulted on the first draft in July 2006.

3.0 ADDITIONAL DATA SUPPLIED BY THE ORNITHOLOGICAL CONSULTANT

- 3.1 We are aware that, since the publication of the Environmental Statement (ES), the ornithological consultant has carried out further studies and additional data has been supplied to certain parties, including English Nature and the RSPB. We are again very disappointed that this information was not made available to the TBC.
- 3.2 We are concerned that, rather than having been undertaken independently, the additional research has been carried out by the same Ornithological Consultant in the employment of the wind farm developer, Northern Offshore Wind. We consider that this may have impacted on the objectivity and reliability of the additional survey work.
- 3.3 We are still firmly of the opinion that the Ornithological Assessment contained in the original Environmental Statement is flawed because of the survey methods used and the conclusions reached are consequently unconvincing, particularly regarding avoidance rates (or, as we prefer to call these, 'collision risks'). We remain concerned that no studies have been undertaken on the annual, large scale inshore movements of seabirds that occur during adverse weather conditions, involving tens of thousands of birds (including auks, shearwaters, ducks, geese, Gannets, skuas, gulls and terns), of which the TBC has a vast knowledge. A number of such movements have occurred since the survey work was completed, in one case involving nearly 4,000 Little Gulls (*Larus minutus*), many of which were observed to fly through the wind farm area.

4.0 TBC's RESPONSE TO THE APPROPRIATE ASSESSMENT

- 4.1 We recognise that the remit of the Appropriate Assessment is to test the potential adverse impacts of the development on the Cleveland Coast SPA and Ramsar site. The Assessment, therefore, focuses on those species connected with these designations and, whilst acknowledging that the data is imperfect, proceeds to use calculations which conclude that there will be no adverse impacts on the site or its fauna.
- 4.2 We cannot criticise the Appropriate Assessment, as it fulfils the statutory requirements for consideration on sites of European importance and, consequently, considers impacts on only a narrow range of bird species.
- 4.3 We would like the following comments to be noted, however:
- We still have serious concerns over collision risks to species not covered by the Assessment and these were highlighted in our document '*Teesside Offshore Wind farm, Redcar – A Formal Objection by Teesmouth Bird Club*' (May 2004). We are particularly concerned about the risks to migrating geese, ducks, shearwaters, skuas, gulls, terns, Gannets and other birds that pass close inshore on an annual basis during adverse weather conditions. Our seabird observations over half a century indicate that many will pass through the wind farm area. We also have concerns over the impacts on the night-time migration of small land birds, such as thrushes, finches, pipits and warblers, when making landfalls on the Cleveland coast during adverse weather conditions. Indeed, because the sole criterion is the potential impact on the SPA, the species included in the Assessment represent only a fraction of those that will be affected by the development.
 - We question how a realistic assessment can be made of 'avoidance rates' when the morphology of the turbines has still not been finalised. The overall height of the turbines, the length of the rotors (and therefore the swept area) and the height of the rotors above sea level will affect these rates significantly. These are critical factors in determining collision risk.

- The Assessment accepts that there are no precedent offshore wind farms in the UK from which to draw meaningful comparisons in terms of collision avoidance rates. The Teesside Wind Farm will, therefore, be very much a 'guinea pig' to monitor the impact on birds. We find this of great concern, bearing in mind the long-standing experience of our own shore-based observations over more than 60 years. It is of particular relevance that no Round 2 offshore wind farms are to be sited as close inshore as the Teesside one, as the Appropriate Assessment states:

"There is recognised to be limited knowledge in the area of collision avoidance for a wind farm of this size, this distance offshore and in relation to the species present and nor is there likely to be any improvement in that knowledge within the UK as no Round 2 wind farms are to be constructed so close to shore."

- We have grave concerns about the obvious lack of agreement on avoidance rates, particularly during adverse weather conditions, at night and during periods of large sprat 'wrecks' in the Tees Estuary, when many birds fly in from the sea to feed – three concerns which we raised in our original objection of May 2004. At these times, it is our opinion that birds will be most at risk.
- It is imperative that, should the development proceed, monitoring work is carried out by ornithologists who are independent of the wind farm industry. The TBC would, in any event, carry out its own monitoring work to establish actual bird mortalities.

5.0 CONCLUSIONS

- 5.1 The energy-producing capacity and efficiency of wind farms have recently been brought into question. Some have failed to deliver the outputs expected or have suffered major failures, as at Nissan (Sunderland), Hart (near Hartlepool) and Blyth, with the latter currently being considered for dismantling due to the expense of repairs to an underground cable. We believe that these flaws will be repeated elsewhere as more wind farms are constructed, yet the environmental damage that some will undoubtedly cause will be considerable.
- 5.2 Having considered the Appropriate Assessment, the Teesmouth Bird Club sees no reason to withdraw its objection to the Teesside Offshore Wind Farm and we urge the DTI to refuse permission on the grounds of the potential collision risk to bird species outside the SPA will be significant.
- 5.3 We believe that because the environmental impacts of this development in terms of the collision risks to seabirds and land birds are so little known, then the Application should at best be refused, or at least referred to a Public Inquiry.