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Dear Sir/Madam,



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Phase 1 SEA – Environmental Report Consultation. BWEA Response

BWEA recognizes the significant contribution of all parties, especially the environmental NGOs, in ensuring that it has been possible to complete the SEA within the tight time-frame required to ensure;

- A) that the final document is meaningful
- B) that it begins the process of addressing the key environmental concerns at a strategic level
- C) development can proceed while we gather and process additional data on the environmental affects of offshore wind farms.

BWEA has the following general observations and comments on the Environmental Report of the Phase 1 SEA. You will note that we have avoided going into detail in this document and look forward to doing this when we address these matters through the SEA Steering Committee.

Public perception. Given the nature of the SEA there is a distinct possibility that the General Public may consider, albeit erroneously, that the SEA represents the Government's 'final word' on offshore windfarms. Given this fact and also that many environmental issues to do with Offshore Wind are yet to be fully understood, it is extremely important that the SEA explicitly recognizes those instances where doubt remains or an issue is not fully understood. In this regard BWEA is concerned to note a number of instances within the report in which assertions are made and implications drawn, on the basis of limited information and minimal consultation (for instance; Table 21 on pp9-48 on visual impact).

Use of the SEA. The Non-technical Summary clearly states that the SEA will 'assist decision making on the design and terms' of the second licensing round for offshore windfarms. Is the purpose of the SEA to make decisions about site selection or is it simply intended to provide supporting data to enable regulators to assess individual applications within defined Strategic areas? BWEA feels that additional clarification would be helpful since in



certain instances the report reads as though it is making decisions about site selection. Given the limited amount of data currently in the SEA, relative to site specific EIAs and detailed developer analysis, BWEA feels that SEA attempts at site selection are necessarily fraught with risk.

Scope. Is the SEA solely about impacts of an environmental, in the narrow sense of the word, nature or should it include environmental impacts in the broader sense of the word? Clearly the report in its current format has concentrated on biota although it also considers wider environmental issues.

BWEA believes that there would be value in an SEA that looks at the broader environment and in this regard it would like to see certain elements of the SEA expanded; particularly those dealing with Shipping, Tourism, MOD, Socio-economic benefits and Recreational Navigation.

Data management. Although there are some data gaps in our knowledge of the marine environment; in many other instances the opposite is true and we have a surplus of information.

Consequently a major challenge as we go forward will be in ensuring that offshore wind related data is well managed and logically referenced. BWEA would like to see consideration given to the development of a central data register to which any party can go in order to find details on any significant marine environmental data related to offshore wind.

BWEA has always hoped that data management would be a cornerstone of the SEA and consequently it is disappointing to note that this matter is hardly present in the final report. Windbase has made a significant start on the whole issue of a single marine database for offshore wind. Ensuring that sufficient funding is made available to build on Windbase's early successes should be a priority.

Comparative impacts. The report has endeavoured to consider the impacts of offshore windfarms on the environment vs. the impacts of other on and offshore activities on the environment (Section 11. Comparative Analysis of Scenarios). Nonetheless this section needs to be significantly expanded.

Too often conclusions on the environmental affects of offshore windfarms are drawn in isolation of the impacts of all other marine and, in certain instances, onshore users. BWEA is firmly of the view that it is not reasonable to consider environmental impacts in isolation. Only by being aware of all impacts will it be possible to ensure that measures are taken which achieve maximum impact mitigation at minimum cost.

Ranking/Weighting. The current ranking system (Section 5. Approach and Method) represents an initial attempt to ensure that the vast range of different environmental impacts can be readily compared one with another. The ability to compare fundamentally different impacts on a like-for-like basis is crucially important. It is therefore of note that, while this section represents a useful first step, it is nonetheless overly simplistic in its current form. Additional work is urgently required.

Early launch of Phase 2 of the SEA. It is vital that we retain the momentum established on Phase 1 by moving quickly to begin Phase 2. Failure to do this means that it will not be long before we find ourselves in a position where the interests of developers and environmental stakeholders, in completing the next phase of the SEA, will no longer be fundamentally aligned.

By beginning the process early it will also be much simpler to incorporate stakeholder concerns into the SEA drafting process. This is an area where the Phase 1 SEA has possibly not been as strong as it could have been.

Early launch of Round 3 of Licensing. In addition to the preceding point: BWEA is keen to initiate Phase 2 of the SEA in a timely fashion as we note that Government has stated that additional licensing rounds will be predicated on additional SEAs. In this regard BWEA notes that regular licensing rounds, without substantive gaps between them, will significantly simplify supply chain management.

Location of additional SEA areas. BWEA notes that if offshore wind development is restricted to a limited number of areas there are two key implications.

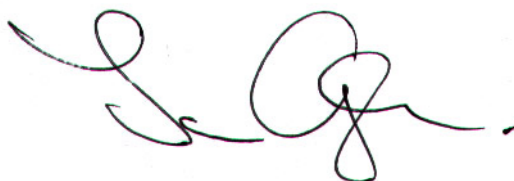
- 1) cumulative environmental impacts may be exacerbated
- 2) expensive grid reinforcement may be required at those sites while significant spare grid capacity, onshore from non-SEA areas, remains unused.

For these reasons we would hope that the next Phase of the SEA considers regions other than the three that we have begun working on in Phase 1 of the SEA.

The Phase 1 SEA has made an admirable start nonetheless there is clearly much that remains to be done. BWEA looks forward to working with environmental and other stakeholders in the months and years ahead to ensure that the SEA reaches its full potential.

If you have any questions please feel free to contact me at any time.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Glennie', with a stylized flourish at the end.

James Glennie
Head of Offshore Renewables
BWEA.