SURFERS AGAINST SEWAGE

Surfers Against Sewage
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**Surfers Against Sewage Comments on the Draft Environmental Statement for the Atlantic Array Offshore Wind Farm**

Surfers Against Sewage would like to make the following comments on the Draft Environmental Statement for the Atlantic Array Offshore Wind Farm.

As indicated by the appendix "Assessment of potential effect on surfing waves", surfing has been recognised as an important recreational activity in the vicinity of the proposed project. As modelling presented in the Environmental Statement indicates negligible effects on surfing waves we currently do not have any concerns with the array itself in relation to surfing resources. However, if an increase in the number of turbines, or the positioning or foundation type were altered then we would request that further modelling is undertaken to ensure that the effects on surfing remain negligible.

However, our main concern lies within the preferred cable landfall site- As recreational value is identified as a factor in the Environmental aspect of the site selection process (p.1, 4.5, Volume 2), the effects of the cable route on surfing waves should have been identified during the selection process. Drilling could result in bathymetrical changes or pollution incidents so this should also have been considered in terms of surfing during the selection process. Cornborough Range contains a number of high value and high quality reef breaks that are used regularly by locals who wish to escape the crowds of saturated beaches further north. These reefs also offer a more challenging ride than the beach breaks in the area as they require more skill due to the faster, "hollower" nature of the waves, which provide a valuable asset for the progression of local surfers (the faster a wave is, the more skill is required to remain in the "pocket" of the wave (just ahead of the advancing wave crest, where most of the wave's power is located). A "hollow" wave has a smaller peel angle and is what

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is required to produce the potential for the wave to tube, so that the surfer can be covered by the wave whilst still travelling along its face- this is known as being "barrelled" and is the ultimate aim for surfers riding waves of this type). Due to the secretive nature of these surf spots, surfers may not have raised concerns during consultation due to fear of revealing these protected breaks. Waves break all along the Cornborough Range, but there is a particular concern that the cable landfall could damage the wave at the landfall site due to a change in bathymetry and in the shorter term, through a lack of access. A number of factors contribute to the "surfability" of a wave- swell size, period (length of time between waves) and direction, wind speed and direction and bathymetry/geographical conditions of the surf spot, all of which combine to make a wave that can be ridden by a surfer. If any of the above factors are changed, then the quality of the wave could be affected. We would request that wave modelling is undertaken to identify the potential effects of the cable and how these could be mitigated. We appreciate that Horizontal Directional Drilling will involve drilling under the rock, but this could result in sediment plumes changing bathymetry in the area or cause pollution incidents due to run off from the drilling, and we request that these issues are also taken into consideration and avoided. Access to the reef should also be considered during the construction phase of the development, and should not be restricted unless completely necessary for the safety of surfers- reduced access should also be limited to certain times of the year to ensure that surfers are not prevented from using the waves during high quality periods of surf.

It is recommended that the SAS reports "Guidance on Environmental Impact Assessment of Offshore Renewable Energy Development on Surfing Resources and Recreation" (2009) and "The WAR Report" (2010)-available online at http://www.sas.org.uk/campaigns/education/sas-reports-and-

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research-papers/, are consulted in order to ensure recreational water users are adequately consulted in the scoping process.

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