

Offshore Wind Farm

ENVIRONMENTAL STATEMENT

Appendix 33.1 Greenhouse Gas Assessment Methodology

Project Reference: EN010119

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1.1 Introduction

- $1₁$ This appendix of the Environmental Statement presents the greenhouse gas (GHG) assessment methodology, associated assumptions and emissions factors used for calculating GHG emissions arising from the North Falls offshore wind farm (hereafter 'North Falls' or 'the Project'), specifically for:
	- Embodied carbon emissions in construction materials and spare parts (Section [1.3\)](#page-11-0);
	- Emissions arising from marine vessels in transit and undertaking construction and operation and maintenance (O&M) activities at the wind farm site (Section [1.4\)](#page-14-0);
	- Emissions arising from helicopter movements for construction and O&M personnel (Section [1.5\)](#page-22-0);
	- Emissions arising from road traffic vehicle movements (Section [1.6\)](#page-23-0);
	- Emissions arising from plant and equipment (Section [1.7\)](#page-25-0); and
	- Emissions arising from waste disposal (Section [1.8\)](#page-31-0).
- $2.$ A number of assumptions are made in the GHG assessment, and these are presented in Table 33.14 of ES Chapter 33 Climate Change (Document Reference: 3.1.35) and outlined in this appendix. Updates to Project parameters and assumptions between the Preliminary Environmental Information Report (PEIR) stage and the ES stage are reflected within this document.

1.2 Context

1.2.1 Climate Change Benefit of Offshore Wind

- $3₁$ Emissions from electricity generation in the UK have decreased by 68% since 1990, the majority of which occurred within the last decade (CCC, 2020). This decrease reflects a move away from coal to gas and low-carbon generation, of which the renewables and offshore wind sector has been a key player. Further reductions are necessary, however, which will require an increase in the role of renewables, along with other supply and demand-side responses.
- $4₁$ The UK has increased its offshore wind operational capacity to 14.7 gigawatts (GW) (RenewableUK, 2024). The UK government has a target to achieve 50 GW of offshore wind capacity by 2030 (BEIS, 2022), which will include developments such as this Project.
- 5. Recent advances in technology and improved construction, and O&M practices have led to an increase in the efficiency of electricity generation. In particular, increases in turbine size yield higher capacity factors. As a result, DESNZ advises that the load factor for new build offshore wind is likely to be 61.5%, which is a significant improvement from 10 years ago (DESNZ, 2023a).

6. Offshore wind is therefore considered to be the backbone of electricity generation in the CCC's scenarios for net zero pathways, contributing 65 – 70% of total generation by 2050 (CCC, 2022).

1.2.2 GHG Emission Sources for Offshore Wind Farms

- The construction, O&M and decommissioning of offshore wind farm projects $7₁$ entails the generation of GHG emissions, both from the standpoint of:
- Embedded carbon and GHGs from the Project components. These are the $8₁$ emissions caused by the extraction and refinement of raw materials and their manufacture into the commodities and products that make up the components of the offshore (i.e., WTGs, offshore substation, export and array cables, etc.) and onshore (i.e., cables, material imports, onshore substation, etc.) infrastructure.
- Carbon and other GHG emissions arising from the combustion of fuels and 9. energy used in constructing, operating and maintaining wind farm components over the Projects' lifetime and in decommissioning. These emissions in this assessment are associated with marine vessel, helicopter, onshore plant and equipment and road transport vehicles.
- The release of emissions from these sources is small in comparison to $10.$ emissions from the fossil fuel generation of energy, and the emissions saved during the generation of electricity from wind resources (when compared to fossil fuel sources) outweigh those released from construction, O&M, and decommissioning activities.
- $11.$ There are inherent uncertainties associated with carrying out GHG footprint assessments for offshore wind energy projects, although the approach to determine emissions from individual source groups is well-defined. The assumptions and limitations of the GHG footprint assessment are detailed in Section 33.4.6 of ES Chapter 33 Climate Change (Document Reference: 3.1.35)
- $12.$ A report published by the University of Edinburgh in 2015 (Thomson & Harrison, 2015) examined the lifecycle costs and GHG emissions associated with offshore wind energy projects, comparing data gleaned from the analysis of some 18 studies carried out over the period between 2009 and 2013 (Thomson & Harrison, 2015). This report supplies useful context for the Project's GHG assessment, and provides benchmark figures which are used to verify the outcomes of the assessment. It is acknowledged that advancements and efficiencies have been gained in the offshore wind sector since this study was undertaken; however, the figures and details within this study are assessed to be applicable and provide useful context for the GHG assessment.
- $13.$ [Table 1](#page-8-1) provides a summary of the percentage of total GHG emissions associated with the different phases of an offshore wind farm development as provided within the report (Thomson & Harrison, 2015).

Table 1 Summary of Offshore Wind Farm GHG Emissions (Thomson & Harrison, 2015)

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 $14₁$ The report highlighted that the greatest proportion of emissions are associated with the manufacture and installation of the wind farm components. Decommissioning accounted for the smallest proportion, only 1.2%, of total lifecycle GHG emissions. A more detailed breakdown of emissions is given in Thomson & Harrison (2015) for an offshore windfarm with steel foundations. This is reproduced in [Plate 1.](#page-9-0)

Plate 1 Summary of offshore windfarm GHG emissions (Thomson & Harrison, 2015)

- $15₁$ Of the components, or phases, shown in [Plate 1](#page-9-0)**.**, GHG emissions associated with foundation fabrication and installation accounted for the largest proportion of emissions (34.7%), followed by manufacture and installation of the turbines (23.8%) and the cables and transformers (19.8%). GHG emissions from shipping movements during maintenance operations over the operational lifetime of the example windfarm contributed 14.3%. This value may appear to be unexpectedly high, but the vessel movements contribution is associated with an assumed 20-year operational lifetime of the wind farms considered in the studies. The operational lifetime of the Project is 30 years; therefore, vessels are likely to be a key source of emissions during O&M. Emissions derived from spare parts (3.7%), helicopter movements (2.4%) and dismantling and disposal (1.2%) are all small in comparison.
- $16.$ A recent report by Catapult (Spyroudi, 2021) investigated the carbon and GHG implications of end-of-use management after decommissioning, as well as some context to carbon Life Cycle Analysis (LCA) of offshore wind farms. Within the studies considered, turbines were predicted to contribute to 50% of the total GHG footprint of materials used in wind farm components. The Catapult report references the National Renewable Energy Laboratory (NREL) report (NREL, 2015), which states that wind turbines are predominantly made of steel (71 to 79% of total turbine mass), fiberglass, resin or plastic (11 to 16%), iron or cast iron (5-17%), copper (1%) and aluminium (0 to 2%). The Catapult report

(Spyroudi, 2021) advises that recycling can save, on average, at least 35% of CO2e per kilowatt-hour (kWh) of generation from assets in an offshore wind farm (operating 6 MW and 10 MW turbines), as opposed to new manufacturing of components.

1.2.3 GHG Intensity of Offshore Wind Energy

- $17.$ In the University of Edinburgh report (Thomson & Harrison, 2015), additional analysis of the data extracted from the 18 technical studies expressed the GHG emissions as grammes (g) of $CO₂e$ per kilowatt-hour (kWh) of electricity generated. These were found to vary quite widely, between approximately 5 g and 33 g CO₂e/kWh. There was not clear relationship between the metrics for either turbine rating (in MW) or capacity factor.
- 18. A further study in 2012 (Dolan & Heath, 2012), amassed the results of over 200 studies of carbon emissions from wind power and attempted to "harmonise" the results to use only the most robust and reliable data and to align methodological inconsistencies. The harmonised results of this study revealed that the range in GHG emissions per kWh of electricity generated varied between approximately 7 g and 23 g CO2e/kWh, with a mean value of around 12 g CO2e/kWh.
- 19. It is noted that these studies were undertaken in 2012 and 2015, and there have been significant advances in the technology, infrastructure and components used for offshore wind farms. Therefore, other available published sources were reviewed to evaluate average GHG intensity of energy produced offshore wind farms, and these are presented in [Table 2.](#page-10-1) As shown, the range of energy intensities for offshore wind farms across the range of studies is 7.8 g to 25.5 g CO2e/kWh.

Table 2 Review of average carbon emissions per kWh

- 20. To place these metrics into context, comparable values for electricity generation by gas and coal are approximately 371 g and 945 g CO₂.kWh⁻¹ respectively (approximately 31 and 79 times that of offshore wind respectively, using the mean value from Dolan & Heath (2012)) (DESNZ, 2023b). These values are for the generation only and are unlikely to account for the construction of the power station infrastructure (i.e., the construction materials such as concrete or steel), or the extraction and processing of the fossil fuels to generate power.
- $21.$ Although robust and fit for the purposes of an EIA, this assessment should not be taken to be a comprehensive, detailed LCA of the Project, the reason being that it is not possible to fully define the supply chain for the Project and

undertake the relevant detailed assessments at this stage in the Project. Therefore, assumptions and simplifications to the methodology are made in certain areas and a precautionary approach has been adopted for the assessment to allow for this. These assumptions and simplifications (outlined in Section 33.4.6 of ES Chapter 33 Climate Change (Document Reference: 3.1.35) and the worst-case scenario is set out in Table 33.3 of ES Chapter 33 Climate Change (Document Reference: 3.1.35)) to the methodology are made in certain areas and a precautionary approach has been adopted for the assessment to allow for this.

1.3 Embodied emissions in materials

- $22.$ Emissions of 'cradle-to-(factory) gate' for the main materials to be used in construction are calculated for the Project. The term 'cradle-to-factory gate' includes raw material extraction, transport, manufacturing and packaging of the materials (required for the construction of the Project) to the point at which they leave the site of the final processing location. GHG emissions were derived from quantities or volumes of likely and/or known materials (at this stage of the DCO Application) that will be used in construction, and their likely material composition.
- 23. These include the following infrastructure:
	- The key offshore components (and their main material components) of the Project comprise:
		- o Wind turbine generators (WTGs), including the tower, nacelle, rotor, blades (materials: steel, copper, iron, fiberglass, etc.);
		- o Offshore substation platform(s) (OSP(s)) / Offshore converter platform (OCP) and structures (material: steel);
		- o WTG and offshore substation foundations (e.g. monopiles, jackets, gravity based, etc.) (material: steel);
		- o Scour protection (material: rock); and
		- o Offshore HVAC export and array cables (main material is likely to be copper).
	- The key onshore components (and their main material components) of the Project comprise:
		- o Onshore cables (main material is likely to be aluminum) and ducting (main material: HDPE) installed underground from the landfall to the onshore substation and the 400 kV cables connecting the onshore substation to the proposed national grid connection point;
		- o Onshore substation (main materials are likely to be steel and copper); and
		- o Imported (and subsequently exported) material for construction at landfall, along the onshore cable route and at the onshore substation, including Bentley Road improvement works, such as aggregate, asphalt, concrete, pipe, cement bound sand (CBS), ducting, geogrid/geotextile, bentonite, water and steel reinforcement, fencing.
- 24. Quantities for all materials to be used during construction are not available at the time of the assessment, therefore estimated quantities of the most common and GHG intensive materials are included in the assessment. To provide a precautionary assessment, it is assumed that there will be no reduction in the emissions intensity of upstream supply chains of wind farm components (e.g., emission reduction in manufacturing methods, low carbon material alternatives) up to and during the construction phase of the Project. This is considered to be a conservative approach as the emissions intensity of activities in sectors such as transport and industry in the UK is likely to decrease over time. The earliest construction start year is anticipated to be 2027.
- 25. It is assumed that all materials used for construction of the Project would require raw material extraction, e.g., virgin steel, to present a conservative assessment. However, it is likely that materials that will be used in construction will have a higher recycled content, and thus a lower embodied carbon content than what has been assumed for the assessment.
- 26. Worst-case assumptions are also adopted with respect to material quantities to be used for each component of the Project, which accounts for contingencies to build flexibility into the design envelope (e.g., the maximum number of WTGs or OSP/OCPs). The specific nature and composition of some materials, such as the type of steel to be used, is unknown, which may affect the embodied carbon content considered in the assessment. Assumptions with respect to material composition are developed based on industry benchmarks and professional judgment using information provided by the Applicant, as outlined in [Table 3.](#page-12-0)
- 27. Realistic worst-case scenarios for the GHG assessment are outlined in Table 33.3 of ES Chapter 33 Climate Change (Document Reference: 3.1.35).
- 28. Relevant emission factors sourced from the Inventory of Carbon and Energy (ICE) database (Jones & Hammond, 2019), where available, are then applied to the material quantities to calculate total tonnes of carbon dioxide equivalent (CO2e), which is a common unit used to express the magnitude of GHG emissions. Where emission factors for specific wind farm components are not available in the ICE database, the relevant emission factors are obtained for other literature sources.
- 29. There are many possible foundation types currently available to support offshore WTGs and/or offshore platforms. Based on the current best estimates of foundations to be used for the Project, emissions are quantified for monopiles or jackets in the GHG footprint assessment, depending on the worst case (in terms of material quantities) for each type of material. The worst case maximum scour protection volumes for each foundation type are used, these are gravity based monopile structures for both the WTGs and OSPs/OCPs.
- 30. [Table 3](#page-12-0) outlines the materials assumed for each key wind farm component, their emission factors and data source(s), and any assumptions or caveats used in the GHG assessment.

Table 3 Emission factors for embodied GHGs in materials

used a 'proxy' material that best represented the actual construction material. This is detailed further in the 'Notes' column, where relevant.

**In kg CO2e per kg material (unless otherwise stated)

- $31.$ The emission factors from the ICE database are 'cradle-to-factory' and, therefore do not account for GHG emissions from the transportation of materials to the wind farm site or onshore Project area. Emissions associated with the movement of materials to the site are quantified from the information available at this stage in the Project for the marine vessel and road traffic vehicle source groups, as highlighted in Section 33.1 of ES Chapter 33 Climate Change (Document Reference: 3.1.35) and detailed in Section [1.4](#page-14-0) and [1.6](#page-23-0) of this appendix, respectively.
- $32.$ Material quantities associated with spare parts to be used during repair and replacement events over the Project's operational lifetime are unknown at this stage. Embodied carbon from spare parts was assumed to be 3.7% of construction and O&M emissions based on benchmarks available in literature sources (Thomson & Harrison, 2015).

1.4 Marine vessels

33. Marine vessels will be used to bring materials and components to the wind farm site, install infrastructure (WTGs, offshore substation platforms/offshore converter platform, substructure and cables), provide crew accommodation and support during construction, commissioning and O&M activities.

- 1.4.1 Indicative vessels logistics – current working assumptions
- 34. In both the construction phase and O&M phase of the Project, two vessel operating modes are considered in the GHG assessment:
	- In transit to/from the wind farm site; and
	- Situated at the windfarm site during construction/operation activities.
- 35. The current working assumptions for offshore vessel logistics during construction and O&M have been supplied by the Applicant and are based on current best estimates. The number of vessel movements and approximate duration on site during construction are outlined in [Table 4.](#page-16-0)
- 36. Vessels used during construction and O&M phases are assumed to travel to the wind farm site from a range of locations, including the marshalling, manufacturer and mobilisation ports and a local construction and O&M port.

Table 4 Indicative number of vessels transit movements and approximate duration on site per trip during construction

*At this stage, assumptions were made regarding the originating location of vessels, and, where practicable, have been based on the reasonable worst case option for each originating location.

vessels vary in type and purpose, and there would be peaks and troughs in the number/duration these support vessels would be present on site during cable installation activities. For the purposes of the GHG assessment, these support vessels have been assumed to be present on site for an average, approximate duration of 5 days per support vessel trip (regardless of support vessel type), as per the assumption used for WTG and foundation installation support vessels.

37. The number of vessel movements during the O&M phase is outlined in [Table 5.](#page-19-1) As mentioned previously, vessels used during construction and O&M phases are assumed to travel to the wind farm site from a range of locations, including the marshalling, manufacturer and mobilisation ports and a local construction and O&M port.

Table 5 Indicative number of vessels transit movements during O&M

- 38. As a conservative scenario, it is assumed that each visit in [Table 5](#page-19-1) will require a separate vessel movement to/from the O&M base. The duration that each vessel listed in [Table 5](#page-19-1) will spend on site is not known at this stage, and therefore further assumptions adopted from other projects of a similar nature are also used for the assessment. These assumptions include:
	- Each JUV and CTV will be on site for four days per visit; and
	- O&M, lift, cable maintenance and auxiliary vessels will be on site for two weeks per visit.
- 39. Emissions from dredging activities during the construction of the Project are not included in the assessment, as a breakdown of information regarding dredging activities is not known to the Applicant at this stage.

1.4.2 Emission calculations

- $40₁$ Marine vessel activities are estimated for the Project are based on best practice guidance documents, including the United States Environmental Protection Agency's (US EPA) 'Port Emissions Inventory Guidance: Methodologies for Estimating Port-Related and Goods Movement Mobile Source Emissions' (2022) and the Global Maritime Energy Efficiency Partnerships Project's (GloMEEP) 'Port Emissions Toolkit' (2018).
- $41.$ Indicative vessel types, as shown in [Table 4](#page-16-0) and [Table 5](#page-19-1) that will be used during construction and O&M activities were provided by the Applicant and representative vessel specifications for these vessel types have been assumed from information provided by the Applicant and experience on comparable offshore wind projects. Based on the estimated vessel specifications, vessel parameters relevant to GHG emission calculations are obtained such as transit speed and engine sizes.

 $42₁$ Vessel emissions during transit are calculated by dividing the total distance covered with the average transit speed to derive total transit time, which was multiplied by the propulsion and auxiliary engine power, their respective load factors and the emission factor. This calculation can be summarised as the following formula:

$$
E_{transit} = \left(\left(A_{transit} * PE * LF_{prop} \right) + \left(A_{transit} * AE * LF_{aux} \right) \right) * EF
$$

Where:

Etransit = GHG emissions during transit (CO2e) Atransit = Activity (hours), defined as the product of the number of return trips and distance per return trip, divided by the vessel's average transit speed PE = Propulsion engine size (kW) AE = Auxiliary engine size (kW) LF = Load factors, for propulsion and auxiliary engines EF = Emission factor (tonnes CO2e/kWh)

Vessel emissions for offshore construction and O&M activities are calculated by 43. multiplying the total on-site time provided by the propulsion and auxiliary engine power, their respective load factors and the emission factor. This calculation can be summarised as the following formula:

$$
E_{site} = ((A_{site} * PE * LF_{prop}) + (A_{site} * AE * LF_{aux})) * EF
$$

Where:

 E_{site} = GHG emissions from offshore construction activities (CO₂e) *Atransit = Activity (hours), defined by the total time on-site as provided by the Project PE = Propulsion engine size (kW) AE = Auxiliary engine size (kW) LF = Load factors, for propulsion and auxiliary engines EF = Emission factor (tonnes CO2e/kWh)*

- 44. Vessel emissions during construction are derived from the sum of all in transit, and offshore construction activity emissions, for all vessel types specified across the entire construction period. O&M vessel emissions are calculated as the product sum of all in transit and offshore O&M activity emissions, for all vessel types specified during a standard O&M year across the Project's operational lifetime of 30 years.
- 45. The emission factors for marine gas oil (MGO) used in the vessel emission calculations is 0.27 kg $CO₂e.kWh⁻¹$, which has been obtained from the Department for Energy Security and Net Zero (DESNZ) (previously BEIS) (DESNZ, 2023c). It should be noted, however, that the maritime sector is expected to decarbonise over the Project's operational lifetime, although projections regarding the rate and extent that such emission reduction will take place still hold considerable uncertainties. As a conservative estimate, it is therefore assumed that construction and O&M vessels will continue to use MGO. However, this is likely to result in an overestimation of GHG emissions, especially with respect to vessels used towards the latter end of the O&M phase.
- 46. Vessel engine sizes have been obtained from public vessel specification sheets, where available. Propulsion engine sizes are assumed to include the main propulsion engines, where provided. Auxiliary engine sizes tend to be undisclosed, therefore, they are estimated based on the total installed power, less the propulsion engine size, or calculated using a ratio provided in US EPA's report on vessel emissions (2009), where auxiliary engine sizes are not specified. The majority of vessels included in the GHG assessment could be broadly categorised as bulk carriers, whose auxiliary to propulsion ratio is estimated at 0.222. For vessels without total installed power specified and whose type falls outside of the US EPA's ratio table, an indicative estimate of 10% of the propulsion engine size is assumed for the auxiliary engine (US EPA, 2009).
- 47. Vessels have various operating modes such as cruising, manoeuvring and hotelling, which affect how much work is being undertaken by the propulsion and auxiliary engines. For the emission calculations, this is captured by the load factor, which represents the percentage of a vessel's maximum engine load while undertaking a specific activity. A vessel's engines are rarely operated at 100% of its maximum load due to fuel consumption costs, efficiency and engine maintenance requirements, therefore most vessel operators limit their engine load to around 83% or less (GloMEEP, 2018). During transit, load factors will be higher for propulsion than auxiliary engines, and vice versa for offshore construction and O&M activities. Load factors used in the vessel emission calculations are detailed in [Table 6.](#page-21-0)

Table 6 Vessel engine load factors assumed for the Project

48. Some elements of the data used to calculate GHG emissions from marine vessels are confidential at this stage due to commercial sensitivities, therefore a detailed breakdown of information used to derive GHG emissions from this source is unavailable.

1.5 Helicopters

- 49. Helicopter movements associated with the commissioning and O&M phases of the Project will result in the release of GHG emissions. It is feasible that technicians will be transported to turbines using helicopters during the commissioning of the Project and unplanned maintenance tasks will be undertaken via helicopters during the O&M phase, when CTV access is not possible. The quantity of GHG emissions from helicopters is calculated by determining the expected fuel consumption using trip data provided by the Applicant.
- $50.$ The Applicant provided an indicative number of helicopter journeys during construction/commissioning and O&M and these are outlined in [Table 7.](#page-22-1)

- $51.$ The total distance travelled by helicopters is determined by multiplying the number of trips by the average trip distance. As advised by the Applicant, it is assumed as a worst case that helicopter trips originated at an example airport such as Norwich, during the construction phase. The distance from the airport to the centre of the offshore project area is assumed to be a straight line distance of approximately 116 km (one-way). As the O&M base for the Project is still not defined, it is also assumed that helicopter trips during the O&M phase originated at this example airport.
- 52. The likely type of helicopters used for these activities is unknown at this stage of the Project, so an indicative helicopter model (AW139) from previous project experience is used to determine fuel consumption. The average cruise speed and fuel consumption data for an AW139 has been obtained from manufacturers specifications to estimate fuel consumption. The emission factors for aviation turbine fuel (or jet fuel) has been obtained from the DESNZ $(2023c)$, which was 3,178 kg $CO₂e$ tonne⁻¹ fuel. GHG emissions from helicopters are calculated using the following equation:

$$
E = \left(\frac{\frac{D}{S} x F}{1,000}\right) x EF
$$

Where:

E = GHG emissions (tonnes CO2e)

D = Average trip distance (km) S = Cruise speed (km/hr)

F = Fuel burn (kg/hr)

EF = Emission factor (kg CO2e per tonne)

1.6 Road traffic vehicles

- 53. Road traffic vehicle movements associated with the construction and O&M phases of the Project will result in the release of GHG emissions. GHG emissions were calculated from the total kilometres (km) travelled by heavy goods vehicles (HGVs) and staff transport to and from the onshore construction sites, and also during the O&M phase.
- 54. The total distance of vehicles travelled during the whole construction phase has been provided by the Transport Consultants for the Project. Distances travelled during the construction phase are calculated for HGVs and employee movements according to the following methodology:
	- General:
		- o Vehicle movements were collated by the Transport Consultants for the Project from ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29); and
		- o The approach adopted is considered to represent a worst case, noting that no reduction in traffic movements has been applied to account for the reassignment of traffic. For example, many HGVs would already be on the local network serving existing supply chains and would potentially reassign to serve North Falls without creating additional demand within the local area.
	- HGV movements:
		- o ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) identifies that bulk materials such as concrete and stone aggregate would make up the majority of the total HGV trips for the Project, and that these deliveries would be expected to travel via the A120, either east from the A12 direction or west from Harwich International Port/Bathside Bay;
		- \circ The distances from the A12 or Port of Harwich (via the A120) have been calculated to each of the project infrastructure destination sites for each stage of construction (this approach is considered to represent a worst-case scenario noting that deliveries from local suppliers would reduce the distance travelled); and
		- o To calculate the total distance travelled, the total number of HGVs per project infrastructure destination (from ES Chapter 27 Traffic and Transport, (Document Reference: 3.1.29) have been multiplied by the distance to the furthest point of origin, i.e. either the A12 or Port of Harwich depending upon which is furthest.
	- Light vehicle movements:
		- o ES Chapter 27 Traffic and Transport (Document Reference: 3.1.29) adopted the approach that the origin of labour has been distributed using census data for all Project labour and that employee mode share of 1.5 people per vehicle, so this assumption has also been used in the GHG assessment;
- o The distribution of light vehicles presented in E Chapter 27 Traffic and Transport (Document Reference: 3.1.29) has been informed by a review of the distribution of local and in-migrant labour;
- o Distances between the employee origins and the project infrastructure destination sites for each stage of construction have been calculated; and
- \circ The total light vehicle movements (per project infrastructure destination sites) were multiplied by calculated distances. This provides the total light vehicle distance travelled in miles.
- 55. The construction phase movements used to calculate GHG emissions are provided in [Table 8.](#page-24-0)

Table 8 Construction phase traffic movements

- 56. To provide a conservative assessment, the fleet make up (in terms of fuel and Euro standards) for the earliest year of construction (2027) is used in the assessment for employee travel. In addition, it is assumed that there were no fuel efficiency improvements or reduction in emissions over the Project's lifetime for each mode of transport in the assessment.
- 57. The forecasted 2027 fleet composition (i.e. proportion of diesel, petrol and electric cars) has been obtained from the Department for Transport (DfT) WebTAG data v1.22 (DfT, 2023). The proportion of diesel, petrol and electric cars in the UK fleet for 2027 has been obtained from the DfT (2023) to determine a representative emission factor associated with employee travel. The fleet composition used in the assessment, and emission factors associated with each vehicle type, are provided in [Table 9.](#page-24-1) Emission factors for each vehicle type have been obtained from DESNZ (2023c).

Table 9 Calculation of emission factor used for light vehicle in assessment

58. It is assumed that all HGVs used on North Falls would be diesel powered. The emission factor for HGV movements (50% laden, to account for one trip fully loaded and return trip empty) has been obtained from DESNZ (2023) and was 0.814 kg $CO₂e.km⁻¹$. In the absence of suitable empirical data, it is assumed that the fleet composition of HGVs did not change over the temporal scope of the assessment to provide a precautionary approach.

59. During the O&M phase of the Project, traffic movements would be limited to those generated by the daily operation and periodic maintenance at the onshore substation and at link boxes along the onshore cable route. It is therefore assumed that there would be two traffic movements (i.e. one visit) per week during the 30-year lifespan of the operational phase of North Falls. This visit is assumed to be a 40 km round-trip, i.e. 20 km each way, and amounts to approximately 2,080 km per annum.

1.7 Plant and equipment

- 60. Fuel consumption associated with the operation of Non-Road Mobile Machinery (NRMM) for the onshore components of the Project are calculated based on the estimated use of each item of plant and equipment. The anticipated fuel demand over the duration of the construction phase is calculated, and the emission factor for gas oil consumption has been obtained from DESNZ (2023) to derive GHG emissions.
- 61. The following assumptions are adopted in the assessment:
	- Plant and equipment are assumed to operate throughout the consented working hours for the Project (66 hours per week). An on-time factor of 75% is assumed and applied for each plant and equipment, unless specified by the Applicant;
	- Construction plant and equipment are all assumed to use diesel to provide a conservative assessment; and
	- Engine sizes for plant and equipment are either provided by the Applicant or obtained for NRMM typically required during construction activities, and from manufacturer specifications. No loading factor was applied to the NRMM engines, as bulking factors were already considered when determining the number of NRMM.
- 62. Indicative durations for plant and equipment at landfall, along the onshore cable route and at the onshore substation are provided by the Applicant. Plant and equipment required for the Bentley Road improvement works are also provided.
- 63. Plant and equipment used during the construction of the Project is provided in [Table 10](#page-27-0) to [Table 12.](#page-30-0) [Table 10](#page-27-0) details the number of plant required for different sections, which includes landfall, the onshore cable route and 400 kV cable route (between the onshore substation and national grid connection point). The information is provided by the Applicant and has been calculated specifically for North Falls.
- 64. The information provided in [Table 10](#page-27-0) represents the average monthly number of plant and equipment that could be present at each section. There will be some variation in the use of plant and equipment over the construction period, therefore average numbers of each plant and equipment per month are calculated (note: due to this approach, these average values may not be a whole number). The duration these plant and equipment are used is dependent on the construction programme. The total number of hours plant is operational during

construction is calculated by multiplying the total number of plant/equipment required per month by the construction hours per month (66 hours per week).

- 65. [Table 11](#page-29-0) and [Table 12](#page-30-0) details the plant and equipment required for the onshore substation and Bentley Road improvement works, respectively, which has been estimated by the Applicant.
- For the purposes of the assessment, it is assumed that plant and equipment is 66. operated using gas oil as fuel, which has an emission factor of 0.27 kg CO2e.kWh-1 (DESNZ, 2023).

Table 10 Plant and equipment requirements (total construction) for different construction sections (include landfall, the onshore cable route and 400 kV cable route)

*Number of plant provided by Applicant as whole numbers per month per section, however these are not the same across the construction period so dividing the total number of each plant needed for a month's duration by 18 (for presentation in the chapter) results in fractions of numbers

**assuming 66 hour work week and 75% on time

Table 11 Indicative plant and equipment to be used during the construction phase at the onshore substation

Table 12 Indicative plant and equipment to be used during the construction phase at Bentley Road Improvement works

1.8 Waste disposal

- 67. Emissions from the disposal of waste generated during the construction of the Project are calculated. GHG emissions are derived from the quantities or volumes of likely materials that will be used in construction, and their likely material composition.
- 68. Quantities for all wastes to be generated during construction are not available at the time of the assessment, due to the design maturity that will take place post consent, therefore estimated quantities of the main known waste types generated were included in the assessment. These include wastes generated during onshore construction works, i.e. during the construction at landfall, along the onshore cable route, onshore substation and Bentley Road improvement works. The waste forecasts however do not include waste generated during construction of offshore infrastructure as this level of detail is not known at this stage of the Project.
- 69. These include the following types of waste:
	- Aggregate and stone;
	- Asphalt and road surfaces;
	- Concrete, hardstanding and kerbs;
	- Pipe, geotextile and geogrid;
	- Fencing;
	- Soil (including topsoil and subsoil) and vegetation;
	- Drill fluid, waste oil; and
	- Waste wood, metal, packing, office waste, etc.
- 70. To provide a precautionary assessment, it is assumed that there will be no reduction in the emissions intensity of downstream waste disposal operations up to and during the construction phase of the Project. This is likely to be a conservative approach as the emissions intensity of some sectors such as transport and industry is likely to decrease over time. The earliest construction start year is anticipated to be 2027.
- 71. The specific waste disposal route for construction waste has not been decided, therefore, worst-case assumptions (i.e. most carbon intensive per tonne of waste) are also adopted with respect to the disposal method, e.g., open- or closed-loop recycling, combustion, composting, landfill, anaerobic digestion, of each waste type.
- 72. Relevant emission factors are sourced from DESNZ (2023) 'GHG Conversion Factor' database, where practicable. If a waste type is not specified in the database, then the 'commercial and industrial waste' option is used. Emission factors used in the assessment are provided in [Table 13.](#page-32-0)

Mixed packaging Plastic / paper 0.0213 Loop / combustion disposal

Table 13: Emission factors used for waste disposal GHG calculations

Average construction /
mineral oil

Commercial and
industrial waste

Wood Wood 0.9252

Mixed construction waste, drill fluid removal, waste

Contaminated packaging, office general waste / paper, canteen waste, wiping

hydraulic oil

clothes

route as a worst case scenario

0.0213 Combustion disposal route as a worst case scenario

0.5203 Landfill disposal route as worst case scenario

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HARNESSING THE POWER OF NORTH SEA WIND

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