An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Ms. Helen Lancaster
Operations Group 3
Environmental Services
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email only to: MorecambeOffshoreWindProject@planninginspectorate.gov.uk

31 July 2024

**RE: Proposed Application by Morecambe Offshore Windfarm Ltd (the Applicant) for an Order Granting Development Consent for the Morecambe Offshore Windfarm (Generation Assets) (the Proposed Development)**

Dear Ms. Lancaster,

I refer to your letter of 26 July 2024 giving formal notification that the above proposed development has been accepted for examination. I wish to confirm, as indicated in my letter of 22 December 2022, that Ireland will participate in the transboundary EIA procedure and will hold a public consultation in this regard.

The notification received proposes a six-week consultation period from the date of the letter (26 July 2024) with a suggested deadline for comments at 6 September 2024. I wish to advise that this suggested timeframe is not sufficient given the voluminous environmental documentation accompanying this application, the time of year i.e. many of the national authorities that need to be consulted will have staff taking annual leave and, due to the statutory process to be followed in Ireland.

Under Irish planning regulations, which transpose our obligations under the Espoo Convention, one or more local authorities are required to carry out transboundary public consultations in respect of individual proposed projects. Due to the nature of the proposed development it is not possible to exclude any local authority area from the potential impacts of the proposal and therefore the consultation must cover the entire State.

**Teach an Chustaim, Baile Átha Cliath 1, D01W6X0**
Custom House, Dublin 1, D01 W6X0
T +353 1 888 2561 | transboundaryeia@housing.gov.ie
www.gov.ie/housing

The Department requires time to determine the most relevant information from the application documentation to make available to the public to ensure they can adequately participate in the public consultation that will be held. We will also need time to co-ordinate materials with each planning authority involved in this process to fulfil our statutory obligations.

For the reasons set out above, it will not be possible for the Department of Housing, Local Government and Heritage to co-ordinate a transboundary public consultation process in Ireland to meet the proposed closing date of 6 September 2024 due to our legislative requirements and the nature of the consultation.

In this regard, attention is drawn to Article 5 of the Espoo Convention, which states:

"*…The Parties shall agree, at the commencement of such consultations, on a reasonable time frame for the duration of the consultation period. Any such consultations may be conducted through an appropriate joint body, where one exists…"*

I understand from the notification letter of 26 July 2024 that the timeframe for examination of the Development Consent Order application by the Examining Authority is six months. This Department is estimating a minimum period of six weeks will be required to prepare the relevant documentation to be made available during the public consultation period. I will be in touch again in August to confirm the public consultation period, which will need to run for a minimum of four weeks.

If you have any queries in relation to this letter, please contact me at transboundaryeia@housing.gov.ie or on 00 353 1 888 2561.

Yours sincerely,

[redacted]

Declan Grehan
Assistant Principal
EU & International Planning Regulation
Department of Housing, Local Government and Heritage
Ireland

**Comhairle Chontae na Mí**
*Teach Buvinda, Bóthar Átha Cliath, An Uaimh,*
*Contae na Mí, C15 Y291, Éire*
***Fón: 00353 46 9097000***
*R-phost: customerservice@meathcoco.ie*
*Web: www.meath.ie*
*Uimhir Chláraithe: 0017277O*

**Meath County Council**
*Buvinda House, Dublin Road, Navan,*
*Co. Meath, C15 Y291, Ireland*
***Tel: 00353 46 9097000***
*E-mail: customerservice@meathcoco.ie*
*Web: www.meath.ie*
*Registration No.: 0017277O*

**Planning Department**
**9th October, 2024**

Planning Inspectorate/ Yr Arolygiaeth Gynllunio,
Operations Group 3,
Environmental Services,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN,
United Kingdom.

**Re: Transboundary Environmental Impact Assessment (EIA) Public Consultation for the Morecambe Offshore Wind Project**

Dear Sir/ Madam,

I refer to the consultation process which is being carried out in accordance with the provisions of the 1991 United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context ("the Espoo Convention"), for the proposed *Morecambe Offshore Wind Project* (by Morecambe Offshore Wind Limited), a wind farm located in the East Irish Sea, which comprises of up to 35 offshore wind turbines in an area of 87km² located 30km from the Lancashire coastline and c. 63km from the Isle of Man. The Morecambe Array Area is located wholly within English offshore waters (beyond 12 nm from the English coast) but it is in proximity to Welsh waters and the Isle of Man.

The Morecambe Array Area is located wholly within English offshore waters (beyond 12 nm from the English coast) but is in the proximity of Welsh waters and the Isle of Man. The Applicant intends to deliver a coordinated UK National Grid connection between the Morecambe project and the proposed *Morgan Offshore Windfarm* (which was subject to recent transboundary consultation request) including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham in Lancashire.

The project includes wind turbine generators, Offshore Substation Platforms (OSPs), foundations (for wind turbines and OSPs), inter-array cables linking the individual wind turbines to each other and the OSP and up to two platform link cables between offshore substation platforms, scour protection, cable protection and offshore interconnector cables linking the OSPs[1]. Construction of the project is

[1] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010121/EN010121-000442-MORC%20-%20Regulation%2032%20Transboundary%20Screening.pdf

proposed to take 2.5 years and expected to have a 35-year operational life (subject to approval) and a lease duration of 60 years. The project will have an indicative capacity of 480MW.

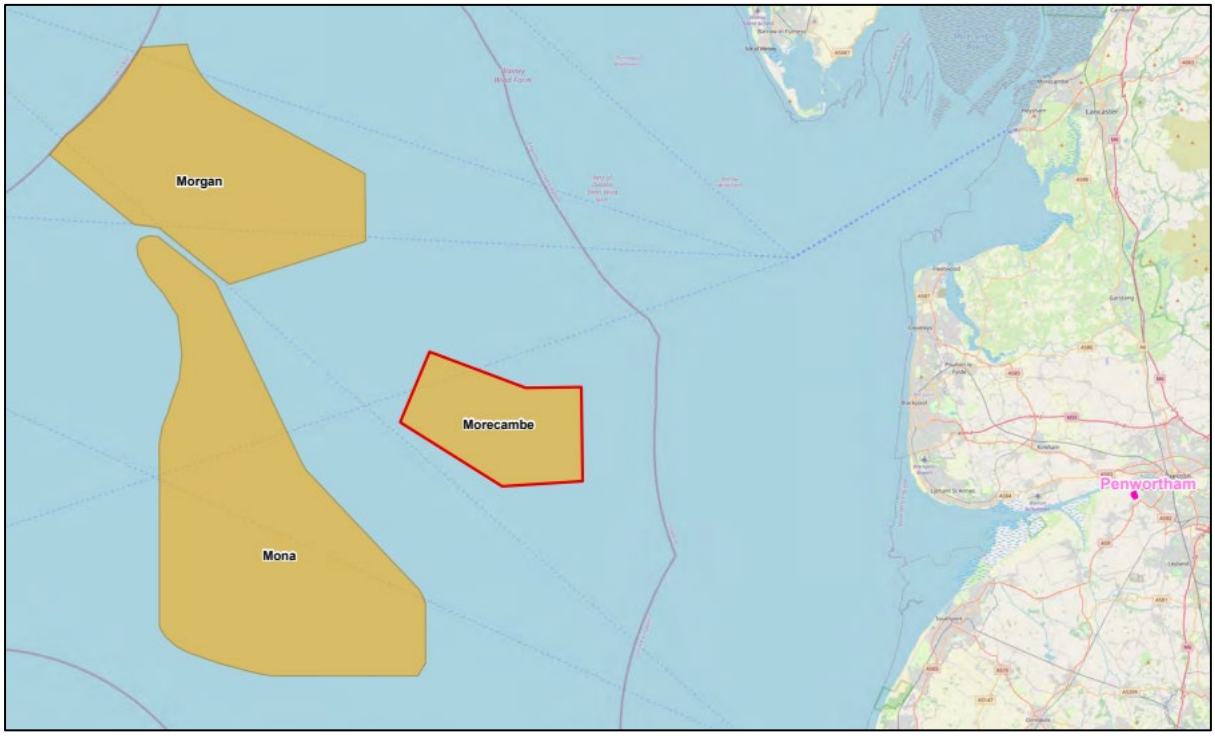


**Fig. 1: Morecambe Offshore Windfarm Location with Other Round 4 Projects**[2]

Meath County Council (MCC) is a Coastal Planning Authority in the Republic of Ireland (ROI) along the east coast of Ireland and the following comments are provided for the consideration of the Planning Inspectorate.

The Coastal Planning Authority (MCC) recently provided comments on a proposed Mona and Morgan Offshore Wind Projects in the east Irish Sea, which are located close to the proposed development and an existing Offshore Wind Farm[3] at Walney.

The UK Government has a target of 50 GW to be generated from offshore renewable energy (wind) by 2030 and the Irish Government has a target of 5GW from offshore renewable energy over the same timescale (as per the Irish National Climate Action Plan).

Several offshore renewable projects are planned in the west Irish Sea, including 3 no. offshore wind farm development consent projects which were submitted to An Bord Pleanála (ABP) in June 2024 for

[2] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010121/EN010121-000028-MORC%20-%20Scoping%20Report%20(Generation%20Assets).pdf
[3] https://orsted.co.uk/energy-solutions/offshore-wind/our-wind-farms/walney-extension

decision which is expected in December 2024 (see table below). ABP are the decision maker on projects deemed to be 'strategic infrastructure' in the Republic of Ireland and are also the 'Competent Authority' for the purposes of Environmental Impact Assessment and Art. 6(3) Appropriate Assessment/ Habitats Regulations Assessment.

| **Applicant: North Irish Sea Array (NISA) Wind Farm Ltd.**<br><br>Location: Off the coast of Co. Louth, Co. Meath, Co. Dublin and landfall in Co. Dublin<br><br>Description: 35-49 no. Wind Turbines & Assoc. Works; *Total blade tip height of 290-316m above LAT (max); Megawatt export capacity of 375 MW; 43-year operational life.* | **Applicant: Oriel Wind Farm Ltd.**<br><br>Location: Off the coast of Co. Louth and landfall in Co. Louth<br><br>Description: 25 no. Wind Turbines & Assoc. Works; *Total blade tip height of 270m above LAT (max); Megawatt export capacity of 700 MW; 35-year operational life.* | **Applicant: Sure Partners Ltd. (Arklow Bank Wind Park 2)**<br><br>Location: Off the coast of Co. Wicklow and Co. Wexford and landfall in Co. Wicklow<br><br>Description: 47-56 Wind Turbines & Associated Works[4]; *Total blade tip height of 273m-287m above LAT (max); Megawatt export capacity of 800MW; 36.5-year operational life.* |
|---|---|---|
| **File Reference No.:** ABP-319866-24 | **File Reference No.:** ABP-319799-24 | **File Reference No.:** ABP-319864-24 |
| **Website Information:**<br>https://www.pleanala.ie/en-ie/case/319866<br>www.northirishseaarraysid.ie | **Website Information:**<br>https://www.pleanala.ie/en-ie/case/319799<br>https://www.orielwindfarm-marineplanning.ie/ | **Website Information:**<br>https://www.pleanala.ie/en-ie/case/319864<br>https://www.arklowbank2offshoreplanning.ie |

The Environmental Impact Assessment Reports (EIAR) prepared by the project proponents (Oriel and NISA) identified likely significant effects including *inter alia*:

- Oriel – negative visual impacts on the local/ Irish coastline, negative impacts on bats in the marine environment and beneficial displacement of Greenhouse Gases (GHGs).
- NISA – negative visual impact on the local/ Irish coastline, potential detonation of unexploded ordnance (UXO) and impact on minke whales, negative impact on commercial fisheries, water quality and bats in the marine environment and birds; and the beneficial displacement of $CO_2$.

Mitigation of the likely significant effects include *inter alia*:

- Oriel – proposed pile-driving strategy to reduce the impact on marine mammals, turbine curtailment during peak bat migration periods and static bat detectors.

[4] https://www.sserenewables.com/offshore-wind/projects/arklow-bank-wind-park/

- NISA – proposed pile-driving management protocol to reduce the impact on marine mammals, increase in turbine air draft between the bottom of turbine blade and the water to reduce collision risk to key vulnerable bird species, fisheries management and mitigation strategy, turbine curtailment during peak bat migration periods and static bat detectors; design flexibility for offshore infrastructure to avoid unexploded ordnance.

Other projects in the west Irish Sea include the Arklow Banks Wind Park Ltd. Project Phase 2 which is located off Co. Wicklow with a proposed landfall north of Arklow Town for up to 56 Wind Turbines and Associated Works. There are other projects at the pre-planning stage (e.g. Dublin Array and Codling Wind Park) that may have been lodged into the planning system before a decision is made on the Morecambe, Morgan and Mona Windfarm projects.

Two no. Transboundary Screening Reports were carried out by the UK and the differences are captured in the 2nd Report (July 2024)[5]. Following the 1st Screening, the ROI was notified regarding likely significant effects on *shipping and navigation and commercial fishing*. In the interim the aspects of the project changed including the description of the proposed development, provision of a *Habitats Regulations Assessment* (HRA), *Transboundary Impacts Screening* and *Transboundary Assessments* within the relevant chapters of the Environmental Statement.

The Transboundary Screening Report states that *likely significant effects* could not be excluded for 23 sites in the ROI. A Report to Inform the AA concludes that there would be *no adverse effect on integrity alone or in-combination on any European Site* including those screened in, in the ROI.

Transboundary impacts are possible to the ROI in respect of **shipping and navigation**, including impacts to established ferry routes, particularly between Liverpool and Dublin. A Cumulative Regional Navigation Risk Assessment identified **significant cumulative effects on ferry routing and vessel safety due to the creation of narrow corridors** between the array areas of the proposed development (Morecambe) and the proposed Morgan and Mona offshore wind farms. However, the report states that **with the implementation of embedded mitigation** for the projects, effects from the proposed development would be **reduced to medium risk** or broadly acceptable which would be a moderate adverse (*not significant*) effect in EIA terms. The Planning Inspectorate have deemed that the proposed development is not likely to have significant effect on the environment in Belgium or the Republic of Ireland.

The Planning Inspectorate are respectively requested to consider the cumulative impact of these findings with the Transboundary Screening Reports for the Mona and Morgan Offshore Windfarm projects, the outcomes of the environmental assessments (EIA and Habitats Directive) for the Morgan and Mona applications, other UK maritime or coastal projects and the 3 no. live Offshore Wind Turbine

[5] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010121/EN010121-000442-MORC%20-%20Regulation%2032%20Transboundary%20Screening.pdf

Generator planning consent applications, located off the coast of the ROI (in the west Irish Sea), in its assessment of the proposed Morecambe Offshore Wind Project and potential mitigation measures. Direct consultation with the Department of Transport[6] (ROI) who deals with maritime matters is recommended.

This includes the proposed timing of construction activities for individual projects, across the Irish Sea given the potential significant impact on the marine and coastal environments including biodiversity and water quality because of sedimentation generated during the construction phase and re-suspension of material in the water column.

The Planning Inspectorate are invited to consider the visual impacts of the proposed Morecambe Offshore Wind Farm project and its interrelationship/ intervisibility between the other various projects in the west and east Irish Sea. It is noted that the EIAR which forms part of the Oriel Application (ROI) states that the project is theoretically visible from the Isle of Man and portions of Anglesey. This may also be relevant to the NISA and Arklow Banks projects and other renewable energy projects entering the planning system. The Planning Inspectorate are also requested to consider the effects of the proposed development on commercial fisheries in the Irish Sea.

Project developers in the west Irish Sea have consulted with each other during the pre-planning stage and similar types of mitigation measures are emerging within the project application documentation. Should the Planning Inspectorate consider it appropriate that the proposed Morecambe project proceed, it is recommended that a broadly consistent approach is adopted, or international best practice informs the application of EIA/ Environmental Assessment mitigation measures to avoid any potential cumulative residual transboundary effects.

A key component of the marine area consent process (i.e. a separate seabed licence process issued by the Maritime Area Regulatory Authority in Ireland in the west Irish Sea) includes a requirement for each renewable energy project to have a Rehabilitation Schedule supported by a decommissioning bond. Its purpose is to ensure there are suitable plans/ protocol in place for the end-of-life/ decommissioning phase of the projects. Therefore, it is recommended that a similar type of approach is implemented by the Planning Inspectorate, *noting that the applicant for the Morecambe Offshore Wind Farm has likely entered into an Agreement for Lease (AfL) for the seabed from The Crown Estate.*

[6] https://www.gov.ie/en/organisation-information/2bec56-maritime/

It is hoped that the above comments will be of some assistance to the Planning Inspectorate and should you have any queries, please don't hesitate to contact me.

Yours sincerely,

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Pádraig Maguire,

Senior Planner, Acting Director of Service

Planning Department,

Meath County Council.

**Public Consultation for the Planning Inspectorate UK on Transboundary Environmental Impact Assessment (EIA) – Morecambe Offshore Windfarm development, located approximately 30km from the Lancashire coastline**

A submission by staff at BirdWatch Ireland

Contact: Rochelle Streker, Marine Spatial Planning Officer,

BirdWatch Ireland Address for correspondence: BirdWatch Ireland, Unit 20 Block D, Bullford Business Campus, Kilcoole/Greystones, Co. Wicklow.

Phone: + [redacted]

Email: [redacted]@birdwatchireland.ie

## Introduction

BirdWatch Ireland is Ireland's leading charity focused on the conservation of wild birds. Established in 1968, we currently have over 15,000 members and supporters and a local network of over 30 branches nationwide. As an organisation, our conservation team is actively involved in seabird conservation, research, and monitoring. Our policy and advocacy team are active stakeholders contributing to marine conservation at a national and EU level. We are the Irish partner of Birdlife International and are members of the Irish Environmental Network, Stop Climate Chaos, and the Sustainable Water Network, and a founding partner of the Fair Seas coalition.

Our vision is that Ireland should become a world leader in marine conservation and the sustainable management of our marine environment. The protection and restoration of Ireland's biodiversity is vital, and rapid decarbonisation is an essential element of this process. BirdWatch Ireland therefore supports the production of renewable energy and offshore wind to help achieve this. However, offshore renewable energy (ORE) devices and infrastructure must be sensitively located to minimise negative impacts on marine and terrestrial ecosystems, and on seabirds in particular as these may be more impacted than other taxa.

## Ireland's Seabirds

Ireland's marine environment plays host to a huge diversity of ornithological life year-round. In summer, our offshore islands and cliffs host seabird breeding colonies, many of which are of international importance or regional significance. In winter, our coasts and estuaries are of huge importance for wintering waterbirds. Seabirds, as top marine predators exposed to all threats affecting the ocean, are excellent biodiversity indicators, providing us with an insight into the health of, and pressures facing, our marine environment [1].

However, 23 of 24 breeding seabirds in Ireland are either Red or Amber listed Birds of Conservation Concern [2]. They are highly vulnerable, facing current pressures and future threats, including (ranked in order of frequency of occurrence) [3].

- Bycatch and incidental killing (due to fishing and hunting activities) [4]
- Desynchronisation of biological/ecological processes due to climate change
- Decline or extinction of related species (e.g. food source/prey, predator/parasite, symbiote, etc.)
- Other invasive alien species (other than species of Union concern).
- Potential impacts from wind, wave and tidal power, including the associated infrastructure

Even though Ireland has designated a network of SPAs at coastal sites aimed at protecting the most important areas for breeding seabirds, trends in population and range for some species are declining [5]. On an European level, of the 24 seabird species regularly breeding in Ireland, nine are declining (Atlantic puffin *Fratercula arctica*, Black-headed gull *Larus ridibundus*, Kittiwake *Rissa tridactyla*, European herring gull *Larus argentatus*, European shag *Gulosus aristotelis*, Great black-backed gull *Larus marinus*, Little tern *Sternula albifrons*, Mediterranean gull *Larus melanocephalus*, and Fulmar *Fulamrus glacialis*) and an additional four have an unknown population trends (Black guillemot *Cepphus grylle*, European storm petrel *Hydrobates pelagicus*, Leach's storm petrel *Hydrobates leucorhous*, and Manx shearwater *Puffinus puffinus*) [6]. On an Irish level, of the 24 seabird species regularly breeding in Ireland, two are declining (Atlantic puffin and Kittiwake) with an additional two species facing probable declines due to HPAI-H5N1 since last census (Arctic tern *Sterna paradisaea* and Common tern *Sterna hirundo*) and unknown population trends for three species (Great cormorant *Phalacorax carbo*, European Shag, and Fulmar) [5 and Pers Comm Dr. Steve Newton, Senior Seabird Conservation Officer, BirdWatch Ireland October 8th 2024]. Due to the sensitive nature of these populations, special consideration should be allocated to any potential effects of offshore development on these seabird species.

For many years BWI has been working to gather data and information on the importance and usage of our marine environment for seabirds and waterbirds. Our work in the Irish Sea includes tagging and tracking of seabirds at key sites, Digital Aerial Survey (DAS) work and observations on the daily movements and flight lines of a range of seabirds. The latter has been part of our annual monitoring and management of key seabird colonies in the Irish Sea for more than 20 years (largely under contract to the National Parks and Wildlife Service (NPWS)). BirdWatch Ireland therefore has a unique understanding of the importance of the Irish Sea for seabirds and the possible impacts of new offshore windfarm developments.

The main impacts of ORE windfarm projects on seabirds and waterbirds include displacement, disturbance, and collision risks. However, there are a range of other possible impacts, including:

- Barrier effects: wind turbines and structural development can interfere with birds foraging and migration routes, potentially increasing their individual energy expenditure and limiting the available habitat
- Cumulative impacts: how are the cumulative impacts being examined? We are extremely concerned that the cumulative impacts of all current and future ORE projects in the Irish Sea are not being assessed
- Wider ecological impacts on fish stocks/prey base and its impact on fishing effort and location: Knowledge of the impact on the prey base/fish stocks is essential to be able to fully assess the impacts on seabirds. How will fishing efforts be shifted and what is the likely impact of such a shift on seabird foraging opportunities? Particular consideration should be given during construction and post-construction on how the additional

disturbance and new structures within the marine environment may change prey location and numbers

- Impacts on non-seabird species, waterbirds and other larger birds using the air space: The flight heights are not known for key species and this data has not been collected, as many digital aerial surveys don't collect height data.

## Transboundary Environmental Impact Assessment (EIA) Public Consultation – Morecambe Offshore Windfarm development

Despite the proposed windfarm development being located outside the territorial waters of Ireland's EEZ, we are commenting due to concerns of transboundary effects on seabirds. There is no overall marine spatial plan for the Irish Sea, but rather six different plans from different jurisdictions at different stages of implementation. We are unclear if there is coordinated strategic planning about locations of United Kingdom (UK) offshore windfarms and nor are we clear if there have been any discussions with the Irish government on its plans for ORE and the protection of Ireland's marine biodiversity in the Irish Sea. As a whole, the Irish Sea is a unique and interconnected ecosystem and should be managed as such, with the range and habitats of many seabird species crossing multiple borders within it. Ensuring transboundary communication and collaboration as multiple governments look to increase and implement more offshore renewable processes is key to ensuring that the cumulative effects of multiple projects do not negatively impact important marine species, including seabirds, and that the marine plans for one region do not undermine the management or ecosystem health of another.

Many of the seabird species seen and recorded by the digital aerial surveys from the Project within the proposed development area are species of special conservation interest that triggered the designation of the many Special Protection Areas (SPAs) in the countries that surround the Irish Sea. In Ireland, the closest SPA to the proposed development site is the North-west Irish Sea (NWIS) SPA which was created due to the immense importance of this area for marine birds [7]. Many of the species which are qualifying interests for the NWIS SPA occur in the proposed Morecambe Offshore Windfarm area as well, including : Common guillemot *Uria aalge*, Manx shearwater, Kittiwake, Razorbill *Alca torda*, Lesser black-backed gull *Larus fuscus*, Herring gull, Common scoter *Melanitta nigra*, Common gull *Larus canus*, Atlantic Puffin, Little gull *Hydrocoloeus minutus*, Red-throated diver *Gavia stellata*, Fulmar, Great black-backed gull, Common tern, Black-headed gull, Cormorant and Shag. These species are found in breeding colonies within the NWIS SPA or occur in large winter assemblages within its waters; this SPA therefore supports important populations throughout the year. Due to its closeness to the proposed area and the large ranges of many of these species, it is likely that some of these birds will be found in the proposed development area. The extent to which birds from the NWIS SPA utilise the Morecambe Offshore Windfarm area should be investigated. We understand that this SPA was possibly designated after the assessment of transboundary effects of the

Morecambe Offshore Windfarm on Irish SPAs, but the assessment should be updated to take account of this new SPA, together with the other Irish SPAs, as set out in the *Morecambe Offshore Windfarm: Generation Assets Volume 4 Report to Inform Appropriate Assessment* document.

Additionally, BirdWatch Ireland has also worked with BirdLife International to identify Important Bird and Biodiversity Areas (IBAs) in Ireland to help inform where further SPAs could be located to meet global targets [8]. While IBAs do not afford legal protection to a site, they are identified using a globally agreed standarised set of data-drive criteria and thresholds. Two of the marine IBAs identified, named the Northwest Irish Sea and Dublin Islands & Cliffs marine extension, overlaps and expands the North-west Irish Sea SPA to further protect seabirds at sea in critically important marine areas. The species for which the IBAs were designated are similar to the qualifying interest species of the SPA and are therefore also likely to be found in the proposed development area for the Morecambe Offshore Windfarm.

In the *Morecambe Offshore Windfarm: Generation Assets Volume 4 Report to Inform Appropriate Assessment* document, the potential effects of the Morecambe Offshore Windfarm development are assessed for a variety of different Irish SPAs, primarily different breeding colony islands and cliffs. The table below shows a summary of the birds assessed in the different Irish SPAs:

**Table 1:** Table of the Irish seabird species assessed by Morecambe Offshore Windfarm Ltd., the number of Irish SPAs each species was assessed at, and their names

| **Species** | **Number of Irish SPAs assessed in** | **Name of SPAs** |
|---|---|---|
| Guillemot | 3 | Lambay, Saltee Islands, Cliffs of Moher |
| Razorbill | 4 | Lambay, Ireland's Eye, Saltee Islands, Cliffs of Moher |
| Puffin | 5 | Lambay, Saltee Islands, Blasket Island, Puffin Island, Skelligs |

| | | |
|---|---|---|
| Fulmar (including breeding only sites) | 16 | Lambay, Saltee Islands, Horn Head to Fanad Head, West Donegal Coast, Tory Island, Cliffs of Moher, Clare Island, Duvillaun Island, High Island Inishshark and Davillaun, Kerry Head, Dingle, Iveragh, Blasket Island, Deenish Island and Scariff Island, Puffin Island, Skelligs |
| Lesser Black-backed Gull | 2 | Lambay, Blasket Island |
| Herring Gull | 1 | Lambay |
| Kittiwake | 7 | Lambay, Howth Head Coast, Ireland's Eye, Wicklow Head, Saltee Islands, Horn Head to Fanad Head, Cliffs of Moher |
| Shag | 4 | Lambay, Saltee Islands, Horn Head to Fanad Head, West Donegal Coast |
| Cormorant | 5 | Lambay, Ireland's Eye, Saltee Islands, Horn Head to Fanad Head, West Donegal Coast |
| Leach's Storm Petrel | 1 | Stags of Broad Haven, |
| Manx Shearwater | 5 | Cruagh Island, Blasket Island, Deenish Island and Scariff Island, Puffin Island, Skelligs |
| Gannet | 3 | Saltee Islands, The Bull and the Cow Rocks, Skelligs |

The findings in the *Morecambe Offshore Windfarm: Generation Assets Volume 4 Report to Inform Appropriate Assessment* document state that no significant effects will occur to any Irish seabirds due to the development; however, BirdWatch Ireland has the following concerns, which we believe should be addressed:

Firstly, the analysis of transboundary impacts of the Morecambe Offshore Windfarm looked at each SPA on its own, assessing impacts to that SPAs population of the critical seabirds individually. We feel this approach is insufficient as it fails to take the ecosystem-based approach. We therefore would recommend a metapopulation approach in order to better understand the potential impacts to the seabirds utilising the marine ecosystem of the Irish Sea as a whole. For example, the seabirds from Irish SPAs individually assessed the most are Fulmar (16 site assessments), Kittiwake (7 site assessments), and Puffin, Manx Shearwater, and Cormorant (5 site assessments each). Within the 7 individual Irish SPA site assessments that assessed Kittiwakes, all were found to be within maximum foraging range for kittiwakes to the proposed development site and the annual total of breeding adult kittiwakes were assessed to be less than 1 bird at each site. The *Morecambe Offshore Windfarm: Generation Assets Volume 4 Report to Inform Appropriate Assessment* concludes that there is '*no potential for the Project to have an adverse effect on the integrity*' at each of these Irish SPAs based on the assumed loss of less than 1 bird at each site; however, Ireland's Kittiwake breeding population is in decline at -36% [5] and its reported status overall has changed from 'Unknown' in 2020 to currently 'GES not achieved' in Ireland's Marine Strategy (established under the Marine Strategy Framework Directive). While losing less than 1 bird may not affect an individual site significantly, the potential combined losses of 7 birds annually in the total Irish breeding population could exacerbate the overall decline of Kittiwakes at a national level. We would suggest that further assessment of the transboundary effects of windfarm developments on seabirds in the Irish Sea should take a metapopulation approach to better understand the combined impacts of these developments on both the populations within the relevant SPAs and the overall national and international populations.

Secondly, we recognise that the cumulative approach has been taken for assessing the impacts to seabirds from the three other proposed wind farms within UK's waters; however, we would request that future cumulative impacts include all proposed wind farm developments within the Irish Sea, including those in the Irish EEZ in order to have a more comprehensive understanding of the totality of the potential impacts to seabirds utilizing this marine ecosystem.

Additionally, Rockabill SPA is not included in the assessment of Irish SPAs. We understand why the NWIS SPA might not be included due to its relatively recent designation(see above for more details), but the lack of inclusion of the Rockabill SPA is a significant oversight due to the importance of this site for Roseate terns (*Sterna dougallii*), Common terns, Arctic terns, and Kittiwakes. Roseate terns in Ireland are not assessed in any of the documentation found in the Morecambe Offshore Windfarm proposed development, despite Rockabill hosting the largest colony of Roseate terns in Europe. The majority of the North West European population is found at just three colonies: Rockabill SPA (Dublin), Lady's Island Lake SPA (Wexford), both in the Irish Sea, and Coquet Island SPA (Northumberland) in the English North Sea. Together these sites act as a metapopulation; Rockabill is the main source population and the other two are more often sinks, especially when the subpopulations nesting at Coquet and Lady's Island Lake

were lower and ‘recovering’ [9]. This situation may be recurring now given the recent (2022-23) outbreak of HPAI-H5N1 that disproportionately impacted Coquet Island SPA. There is continual inter-connection between the three, with individuals emigrating from one site and recruiting (to breed) at another. This inter-colony movement is illustrated by Redfern *et al.* (2020a) [10].

Significantly, the movement (autumn/spring migration) of Roseate terns to and from Coquet Island is largely oriented northeast-southwest overland (Northern England) rather than via the sea corridor of the North Sea. The majority of tagged birds are passing through the northeast Irish Sea lying between the Isle of Man, Cumbria and North Wales, with several moving through Morecambe Bay itself (see Figures 1 and 2 below). This research clearly illustrates the importance of the Irish Sea for Roseate terns moving between these three colonies.

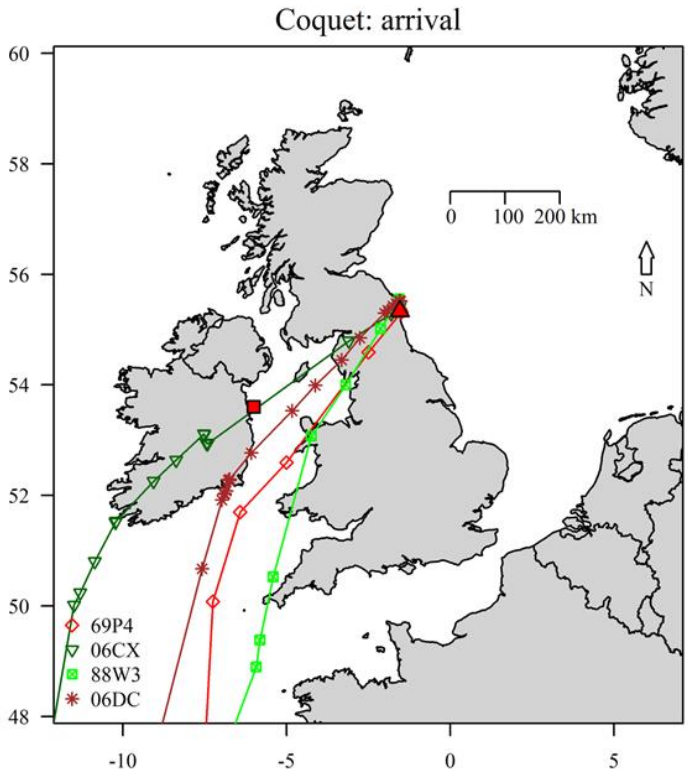


**Figure 1:** Tracking data on the arrival routes of 4 individual Roseate Terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration.

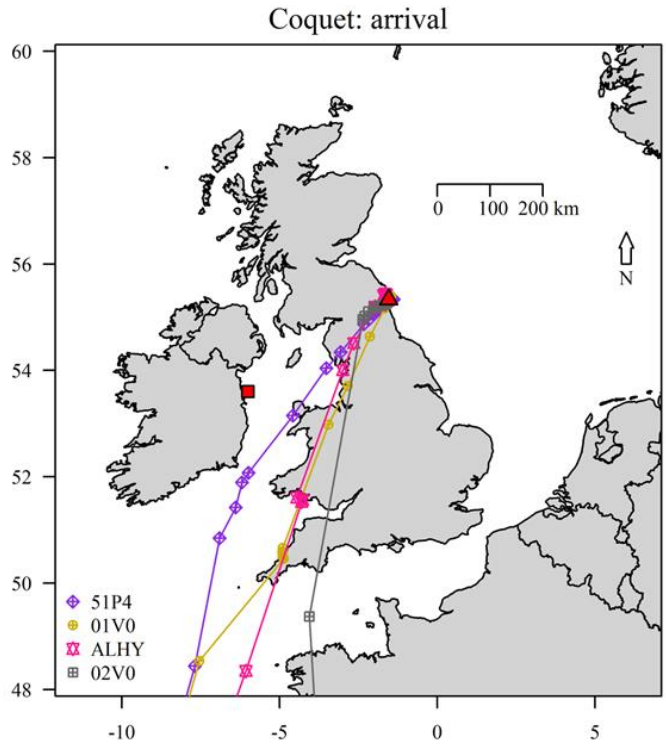


**Figure 2:** Tracking data on the arrival routes of an additional 4 individual Roseate Terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration.

We are concerned that this internationally important and rare European Red-listed species was not identified as a species of interest and at risk in the surveys, literature reviews, consultations and environmental assessments of the project. BirdWatch Ireland finds this a significant oversight and would request that the impacts of the Morecambe Offshore Windfarm and all future developments in the Irish Sea consider impacts to Roseate Terns and the connections between these important colonies.

Also, we know from geolocator tracking data for Arctic Terns that the Irish Sea is an important staging area for birds leaving the UK in autumn (August-September) and arriving in spring (see Figure 3 below) [11].

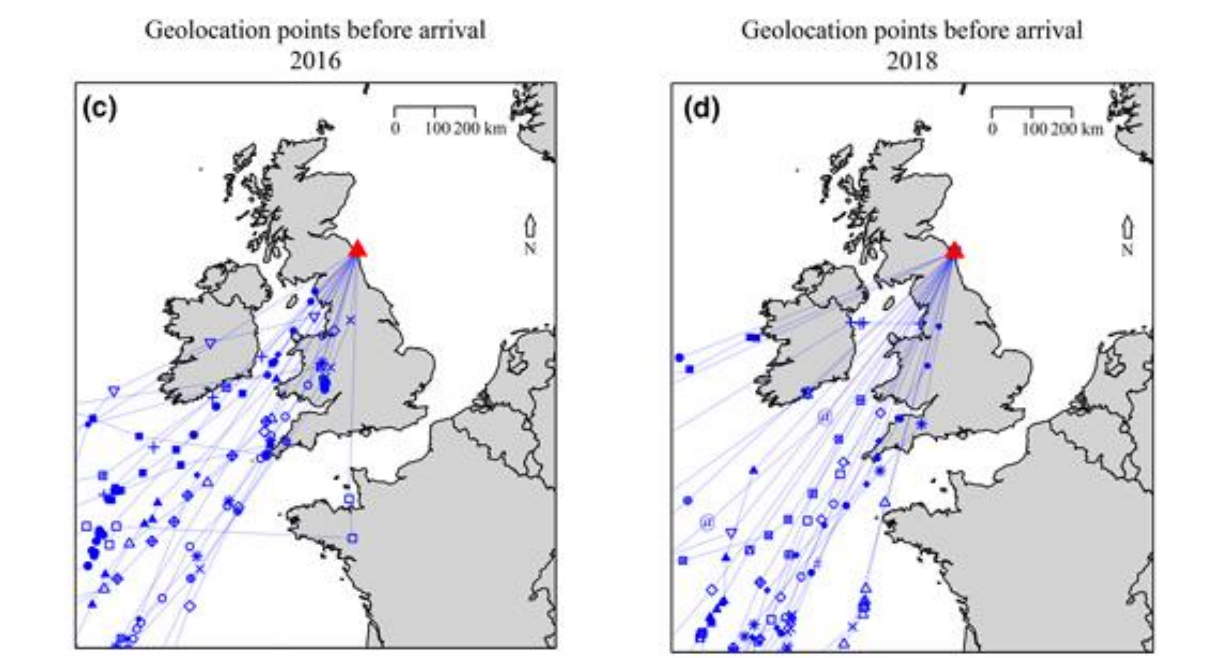


**Figure 3**: Tracking of the arrival routes of Arctic terns to Coquet Island SPA in 2016 and 2018 that show use of the Irish Sea and Morecambe Bay in migration

Redfern *et al.* (2020b) refer to overland migration of Arctic terns heading to and from the large Northumberland colonies of the Farne Islands and Coquet Island SPA, where the birds were tagged. As geolocator accuracy may be up to +/- 50 km, these birds may well be using Morecambe Bay coastal waters at some stage. Although parts of Morecambe Bay are designated as SPAs, there are several windfarms are already operating in this part of the Irish Sea. We would request that further assessment be done for Arctic Terns in the Irish Sea due to their migration patterns which could put them at risk of collision and displacement from offshore energy development.

Finally, the *Scoping Report for the Morecambe Offshore Windfarm* states that '*birds are considered to be most at risk from disturbance when they are resident in an area at any time of year, as opposed to birds on passage during migratory seasons'*. We welcome the addition of 'at any time of year' to the definition of resident bird species given the importance of the Irish Sea to both breeding and wintering assemblages of birds; however, we concur with the Scoping Opinion - we are unsure of the evidence of this statement. The effects on migratory birds must be fully considered when assessing the potential impacts to birds from this proposed development and should be assessed along with the effects on breeding and wintering assemblages. Migratory birds often fly at higher elevations, and therefore could be more impacted by the development of wind farms, particularly when it comes to collisions [12]. The *Morecambe Offshore Windfarm: Generation Assets Environmental Statement Volume 5 Non-Technical Summary (PINS Document Reference 5.1)* also states that '*the risk to seabirds from*

*cumulative displacement and collision is assessed as no greater than minor adverse significance for all species, with the exception of Great black-backed gull*'; however, no data or justification is given for this statement. The Scoping Opinion also highlights the lack of justification for potential transboundary impacts during construction and decommissioning and asks for this or an assessment of transboundary impacts to birds to be included. We would second this request. Indeed, the UK is a party to the Convention on the Conservation of Migratory Species and has agreed to measures to protect migratory species including birds.

**Conclusion:**

With an increase in the amount of proposed renewable development in the Irish Sea, from within Ireland and outside Irish borders, transboundary impacts and the cumulative effect these projects may have on birds needs to be better understood and planned for. The migratory nature of seabirds and the large size of their ranges make it possible that the populations of seabirds within the Irish sea intermix and are inter-connected between the countries; this should be further studied in order to understand how transboundary impacts could affect the overall populations of seabird species utilizing these waters. Given the amount of offshore renewable development planned in the Irish Sea, we at BirdWatch Ireland ask for a comprehensive transboundary assessment to be completed before the application goes any further. One central issue for the Morecambe Offshore Windfarm proposal is whether the increase in turbines and expansion of windfarm development in the Irish Sea will have an effect where the birds are being squeezed into ever smaller areas in both Morecambe Bay and Irish waters. To answer that we would need evidence on whether seabirds are avoiding other windfarm areas.

We would also like more information on whether the Morecambe Offshore Windfarm would be in an area likely to be used by foraging seabirds. The potential that windfarms could have positive benefits for fish spawning, increasing prey availability for foraging seabirds, should be explored as it could help mitigate some negative effects of increased offshore development to seabirds. Another possible mitigation we feel should be added to planning is that UK regulators should consider painting at least one turbine blade black as a collision-reduction measure [13], and request that funding is made available to find out if painting a blade black would lower any risk of collisions with seabirds in the Irish Sea and encourage further tern tracking work to better understand tern migration through the area.

In the Irish waters of the Irish Sea, several windfarm developments are being proposed, and with the proposed Morgan and Mona wind farm developments in UK waters as well as the Morecambe Offshore Windfarm, there is a very genuine possibility that cumulative effects of all these new wind developments could be a serious threat to seabirds that utilize the marine environment. We fear that assessing each development individually and within a bubble without a cumulative assessment of the totality of all the proposed developments within the Irish Sea risks missing or underestimating impacts to birds and the marine environment and could

negatively affect seabirds in the entire Irish Sea marine environment regardless of country boundaries.

From the evidence presented to us in the supporting documents to the application and the gaps in the identification of seabirds at risk of the proposed development, it is not possible to conclude that there will be no significant adverse impacts to the conservation interests of Irish SPAs and further investigation and mitigation is required.

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