North West Wildlife Trusts

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Morgan Offshore Windfarm Generation Assets Relevant Representation

10/07/2024

To whom it may concern,

The Relevant Representation submission from the North West Wildlife Trusts (Cumbria, Lancashire and Cheshire).

Registration identification number: 20049346

This is a response from The North West Wildlife Trusts (NWWT), covering Cumbria WT, Lancashire WT and Cheshire WT.

TWT are a movement of 46 independent Wildlife Trusts (including NWWT) covering the UK, the Isle of Man and Alderney, and are the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea. We improve places for wildlife and strengthen the relationship between people and the natural environment. Our aim is to protect and create resilient ecosystems on land and in the sea.

Our general comments can be found in Annex 1.

Yours faithfully,

Georgia de Jong Cleyndert
Head of Marine
North West Wildlife Trusts

Annex 1:

Summary of key points

- We are supportive of offshore wind generation, but development must not be at the expense of nature
- We welcome the strategic coordination of energy generation and transmission infrastructure
- We expect Morgan OWF to aim to achieve an overall net positive impact on biodiversity and ecology in the marine environment.
- We are disappointed that a future monitoring plan of many of the ecological receptors has not been embedded into the project to validate predictions in the ES and inform future projects
- Concerns over the large maximum design parameters
- We are pleased to see that the Morgan OWF will not pass through any designations. However, please note that there is potential for this scheme to have adverse impacts outside of designated areas.
- We welcome that there will be the development of, and adherence to, a Marine Mammal Mitigation Protocol (MMMP).
- Ornithology - we expect that all impacts are minimised through the project design and best use of available technology e.g. minimum tip height of turbines to reduce impacts, minimising moving parts and/or the number of turbine blades, slower rotation speeds, and blunt edges on the structure, slow start procedures for turbines.
- Transboundary issues - we are concerned that given the number of proposed offshore wind farms in the eastern part of the Irish Sea, there will be a 'belt' of wind farms from the Isle of Man down to Wales resulting in significant barrier effects.

Our position on offshore wind development

We support action to tackle climate change and recognise the serious threat to nature if action is not taken. However, we also face an ecological emergency with 41% of species in decline in the UK.[1] There is an inextricable link between the climate and nature crises, which means efforts to solve one crisis will be futile if they do not also address the other. Consequently, fulfilling UK ambitions for energy infrastructure as a major decarbonisation pathway to limit climate change will fail if they do not achieve environmental protection, recovery, and enhancement of marine and onshore habitats, species, and carbon stores.

The scale of OWF planned in the Irish Sea make makes it one of the most significant activities with the potential to impact on wildlife and ecology in our coastal waters and the wider Irish Sea, arguably second only to fishing. To realise the potential contribution of OWF to decarbonising the energy sector and helping to mitigate the worst impacts of climate change on society and nature, it must protect and support nature's recovery on land and at sea.

Strategic coordination of energy generation and transmission infrastructure

The Wildlife Trusts (TWT), of which the NWWTs are members, have long advocated for greater strategic coordination in the planning, design, and delivery of offshore electricity generation together with the offshore and onshore electricity transmission infrastructure needed to distribute electricity generated offshore to where it is needed, to reduce environmental and consenting risks.

[1] Sustainable Seas - Environmental Audit Committee - House of Commons (parliament.uk)

To this end TWT is represented on the Offshore Transmission Network Review (OTNR) Expert Advisory Group and participates in strategic forums such as the Offshore Wind Evidence and Change (OWEC) Programme.

We therefore welcome that the Morecambe and Morgan OWF have been scoped into the Pathways to 2030 Workstream under the OTNR and will therefore share transmission assets.

Strategic compensation and enhancement

One opportunity of strategically planned offshore energy generation and electricity transmission infrastructure (including onshore elements) is for strategic approaches to compensating for residual environmental impacts that cannot be avoided or adequately mitigated. There is significant potential for such measures to have a greater overall positive impact on the environment and biodiversity and take compensation beyond the level of no net loss into achieving net positive effects.

Whilst we recognise that Biodiversity Net Gain policies and delivery frameworks are more developed for terrestrial and intertidal habitats than they are for the marine environment, we would still expect Morgan OWF to aim to achieve an overall net positive impact on biodiversity and ecology in the marine environment.

Monitoring plans

We are disappointed that there is not a future monitoring plan embedded within the project for many of the ecological receptors.

The applicant states that in terms of physical processes, no specific monitoring is recommended beyond those related to undertaking maintenance activities outlined in the project description. Additionally, the applicant has concluded that there will be 'no significant effects' to benthic ecology receptors as a result of the Morgan Generation Assets alone or cumulatively with other projects and so no monitoring has been proposed. However, we would expect that monitoring to be carried out to determine whether the predictions are accurate.

Would like to see monitoring of fishing patterns. Conversations with local fisherman suggest they believe that windfarms have impacted their catch over the past number of years. There is currently no evidence other than anecdotal to prove or disprove this theory, this provides an opportunity to collect data to inform future decisions.

Large maximum design parameters

We note that the maximum design parameters are very large (i.e. for sandwave clearance and cable protection), however we would like to see more refined parameters that are closer to the realistic to be properly informed.

Designated sites

Energy cables and infrastructure, placed in the wrong location, can cause habitat damage and loss. Several Marine Protected Areas (MPAs) are in unfavourable condition due to the impact of cabling infrastructure.[2] We are pleased to see that the Morgan OWF will not pass through any designations. However, please note that there is potential for this scheme to have adverse impacts outside of designated areas. The developer must assess these and

[2] For example, Inner Dowsing, Race Bank and North Ridge SAC, The Wash and North Norfolk Coast SAC.

other potential impacts on marine ecology outside MPAs and propose suitable mitigation and compensation to achieve an overall benefit to these habitats and wider marine ecology from the scheme. Further, we expect designated sites that are close to the site to be fully considered, particularly those that fall within the ZOI.

Noise mitigation

We expect the assessment and proposed mitigation and management of underwater noise disturbance impacts on marine mammals during the construction, operation, and decommissioning of the proposed Morgan OWF will be carried out in accordance with guidance or any future guidance that might supersede it. A significant number of high noise-generating activities will take place in the Irish Sea during the survey and construction period for Morgan. Although there is currently no regulatory mechanism in place for managing the in-combination underwater noise impacts and the development will not need a Site Integrity Plan, it is vital that the applicant mitigates the noise impacts generated from the project as much as possible. We welcome that there will be the development of, and adherence to, a Marine Mammal Mitigation Protocol (MMMP).

Ornithology

We expect that all impacts are minimised through the project design and best use of available technology e.g. minimum tip height of turbines to reduce impacts, minimising moving parts and/or the number of turbine blades, slower rotation speeds, and blunt edges on the structure, slow start procedures for turbines. Given the number of OWF being developed in the Irish Sea, we expect a full cumulative impact assessment to be undertaken, including consideration of transboundary impacts. Concerns are raised over the possible disturbance, displacement and barrier effects on sensitive receptors, particular black-legged kittiwake and northern gannet.

Transboundary

Given the proximity to Welsh waters and Isle of Man, we expect there to be full consideration of transboundary effects and cumulative impacts across borders. The Irish Sea is a busy regional sea, under significant pressure and the cumulative and in-combination effects on the marine environment from building offshore infrastructure on such a large scale could have significant impacts on the marine environment if not managed correctly. We are concerned that given the number of proposed offshore wind farms in the eastern part of the Irish Sea, there will be a ‘belt’ of wind farms from the Isle of Man down to Wales resulting in significant barrier effects.