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## **Meath County Council**

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**3<sup>rd</sup> September, 2024.**

**By Email to:** [MorganOffshoreWindProject@planninginspectorate.gov.uk](mailto:MorganOffshoreWindProject@planninginspectorate.gov.uk)

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

**Re: Transboundary Environmental Impact Assessment (EIA) Public Consultation for the Morgan 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 *Morgan Offshore Wind Project* (by Morgan Offshore Wind Limited), a wind farm located in the East Irish Sea, which comprises of up to 96 offshore wind turbines located 22 km from the Isle of Man coastline; 37 km from the northwest coast of England; and 59 km from the Welsh coastline (Anglesey) and associated transmission infrastructure extending over 280km<sup>2</sup>. The Morgan Array Area is located wholly within English offshore waters (beyond 12 nm from the English coast). The Applicant intends to deliver a coordinated grid connection with the proposed *Morecambe Offshore Windfarm* including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham.

The project includes wind turbines, Offshore Substation Platforms (OSPs), foundations (for wind turbines and OSPs), inter-array cables linking the individual wind turbines to each other and the OSP, scour protection, cable protection and offshore interconnector cables linking the OSPs<sup>1</sup>. Construction of the project is proposed to commence in 2026 and expected to be fully operational by 2030 (subject to approval).

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

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<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000126-F1\\_Morgan\\_Gen\\_ES\\_Non-technical%20summary.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000126-F1_Morgan_Gen_ES_Non-technical%20summary.pdf)

The Coastal Planning Authority (MCC) recently provided comments on a proposed Mona Offshore Wind Project in the east Irish Sea, 28.2km from the Anglesey coastline with an applicable area of 300km<sup>2</sup> within Welsh offshore waters (beyond 12 nm from the Welsh coast) and a Grid Connection at a Bodelwyddan. The Coastal Planning Authority is also aware of the existing Walney Offshore Wind Farm<sup>2</sup> and proposed Morecambe Offshore Windfarm project<sup>3</sup> 30km from the Lancashire Coast (including Blackpool) and the proposed connection of both offshore projects to the national grid at Penwortham despite being separate applications.

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 decision which is expected in December 2024. 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.

<p><b>Applicant: North Irish Sea Array (NISA) Wind Farm Ltd.</b></p> <p>Location: Off the coast of Co. Louth, Co. Meath, Co. Dublin and landfall in Co. Dublin</p> <p>Description: 35-49 no. Wind Turbines &amp; Assoc. Works; <i>Total blade tip height of 290-316m above LAT (max); Megawatt export capacity of 375 MW; 43-year operational life.</i></p>	<p><b>Applicant: Oriel Wind Farm Ltd.</b></p> <p>Location: Off the coast of Co. Louth and landfall in Co. Louth</p> <p>Description: 25 no. Wind Turbines &amp; Assoc. Works; <i>Total blade tip height of 270m above LAT (max); Megawatt export capacity of 700 MW; 35-year operational life.</i></p>	<p><b>Applicant: Sure Partners Ltd. (Arklow Bank Wind Park 2)</b></p> <p>Location: Off the coast of Co. Wicklow and Co. Wexford and landfall in Co. Wicklow</p> <p>Description: 47-56 Wind Turbines &amp; Associated Works<sup>4</sup>; <i>Total blade tip height of 273m-287m above LAT (max); Megawatt export capacity of 800MW; 36.5-year operational life.</i></p>
<p><b>File Reference No.:</b> ABP-319866-24</p>	<p><b>File Reference No.:</b> ABP-319799-24</p>	<p><b>File Reference No.:</b> ABP-319864-24</p>

<sup>2</sup> <https://orsted.co.uk/energy-solutions/offshore-wind/our-wind-farms/walney-extension>

<sup>3</sup> Morecambe Offshore Wind - The future of renewable energy

<sup>4</sup> <https://www.sserenewables.com/offshore-wind/projects/arklow-bank-wind-park/>

<b>Website Information:</b> <a href="https://www.pleanala.ie/en-ie/case/319866">https://www.pleanala.ie/en- ie/case/319866</a> <a href="http://www.northirishsearraysid.ie">www.northirishsearraysid.ie</a>	<b>Website Information:</b> <a href="https://www.pleanala.ie/en-ie/case/319799">https://www.pleanala.ie/en- ie/case/319799</a> <a href="https://www.orielwindfarm-marineplanning.ie/">https://www.orielwindfarm- marineplanning.ie/</a>	<b>Website Information:</b> <a href="https://www.pleanala.ie/en-ie/case/319864">https://www.pleanala.ie/en- ie/case/319864</a> <a href="https://www.arklowbank2offshoreplanning.ie">https://www.arklowbank2offs horeplanning.ie</a>
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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<sub>2</sub>.

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.
- 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 Morgan, Mona and Morecambe Windfarm projects.

Two no. Transboundary Screenings were carried out by the UK and the differences are captured in the 2<sup>nd</sup> Report (July 2024)<sup>5</sup>. Following the 1<sup>st</sup> Screening, the ROI was notified regarding likely significant effects on *marine mammals, 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 *HRA Screening* concluded that likely significant effects could not be excluded for harbour porpoise and grey seal features of 4 Sites of Community Importance in ROI due to potential noise disturbance

<sup>5</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000260-MGOW%20-%20Regulation%2032%20Transboundary%20Screening.pdf>

due to piling, clearance of unexploded ordnance, pre-construction site investigation surveys, vessels and other vessel activities, and in-combination effects. Similarly, the HRA Screening concluded that LSE could not be excluded for offshore ornithological features of six Special Protection Areas (SPAs) located in the ROI due to potential disturbance, displacement, collision effects and in-combination effects. However, it is noted that a HRA 'Information to Support an Appropriate Assessment' (ISAA) concluded that there would be *no adverse effect on the integrity of the qualifying features of these European sites, alone or in-combination*.

The *Transboundary Impacts Screening* included (Screened in) fish and shellfish ecology, marine mammals, offshore ornithology, commercial fisheries, shipping and navigation, and climate change. No significant transboundary effects on commercial fishing fleets from ROI were identified. In respect of **shipping and navigation**, the Environmental Statement Volume 2, Chapter 7 concludes that there would be **significant effects** from the project alone and cumulatively with other projects and plans. This includes **significant cumulative effects on commercial operations including strategic routes and lifeline ferries**. The ES identifies ferries transiting between the Republic of Ireland and England and concludes that "no additional" potential transboundary impacts have been identified<sup>6</sup>.

The Planning Inspectorate are respectively requested to consider the outcomes of the environmental assessments (EIA and Habitats Directive) for the Morgan application, other UK applications such as Mona and Morecambe Offshore Wind Farms, etc. and the 3 no. live Offshore Wind Farm planning consent applications off the coast of the ROI (in the west Irish Sea) in its assessment of the proposed Morgan Offshore Wind Project and potential mitigation measures.

In the assessment of the proposed Morgan Offshore Windfarm project, it is respectively requested that the Planning Inspectorate considers the cumulative effects of offshore renewable energy projects in UK and Irish waters/ Irish Sea.

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 Morgan 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 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

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<sup>66</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000126-F1\\_Morgan\\_Gen\\_ES\\_Non-technical\\_summary.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000126-F1_Morgan_Gen_ES_Non-technical_summary.pdf) (p.48)

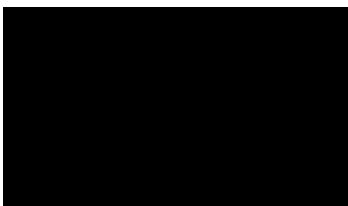
planning system. The Planning Inspectorate are also requested to consider the effects of the proposed development on shipping and navigation and commercial fisheries in the Irish Sea.

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 Morgan 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 residual transboundary effects, etc.

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 Morgan Offshore Wind Farm entered into an Agreement for Lease (Afl) for the seabed from The Crown Estate in early 2023.*

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,  
Planning Department,  
Meath County Council.