

Comhairle Chontae na Mí

Teach Buvinda, Bóthar Átha Cliath, An Uaimh,
Contae na Mí, C15 Y291, Éire

Fón: 046 – 9097000/Fax: 046 – 9097001

R-phost: customerservice@meathcoco.ie

Web: www.meath.ie

Uimhir Chláraithe: 00172770



Meath County Council

Buvinda House, Dublin Road, Navan,
Co. Meath, C15 Y291, Ireland

Tel: 046 – 9097000/Fax: 046 – 9097001

E-mail: customerservice@meathcoco.ie

Web: www.meath.ie

Registration No.: 00172770

monaoffshorewindproject@planninginspectorate.gov.uk

16/07/2024

Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN
United Kingdom

Re: Transboundary Environmental Impact Assessment (EIA) Public Consultation for the Mona 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 Mona Offshore Wind Project, an offshore wind array located in the east Irish Sea, 28.2km from the Anglesey coastline, offshore transmission infrastructure extending to landfall on the north coast of Wales; and an onshore transmission infrastructure extending from landfall to the onshore National Grid substation at Bodelwyddan. As per the Environmental Assessment Non-Technical Summary, the applicable area is 300km² within Welsh offshore waters (beyond 12 nm from the Welsh coast).

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

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 two no. two offshore wind farm development consent projects which were recently submitted to An Bord Pleanála (ABP) for decision. ABP are the decision maker on projects deemed to be ‘strategic infrastructure’ and are also the ‘Competent Authority’ for the purposes of Environmental Impact Assessment. The Planning Inspectorate are respectively requested to consider the following applications in the EIA/ Environmental Assessment associated with the Mona Offshore Wind Project:

Applicant: North Irish Sea Array (NISA) Wind Farm Ltd.	Applicant: Oriel Wind Farm Ltd.
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Location: Off Co. Louth, Co. Meath, Co. Dublin and landfall in Co. Dublin	Location: Off Co. Louth and landfall in Co. Louth
Description: 35-49 no. Wind Turbines & Assoc. Works; <i>Total blade tip height of 290-316m above LAT (max); Megawatt export capacity of 375 MW; 43-year operational life.</i>	Description: 25 no. Wind Turbines & Assoc. Works; <i>Total blade tip height of 270m above LAT (max); Megawatt export capacity of 700 MW; 35-year operational life.</i>
File Reference No.: ABP-319866-24	File Reference No.: ABP-319799-24
Website Information: https://www.pleanala.ie/en-ie/case/319866 www.northirishsearraysid.ie	Website Information: https://www.pleanala.ie/en-ie/case/319799 https://www.orielwindfarm-marineplanning.ie/

The Environmental Impact Assessment Reports (EIAR) prepared by the project proponents 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 CO₂.

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 Works¹. 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 Mona Windfarm project.

¹ <https://www.sserenewables.com/offshore-wind/projects/arklow-bank-wind-park/>

In the assessment of the proposed Mona 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.

In particular, 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 as a result of sedimentation generated during the construction phase and re-suspension of material in the water column.

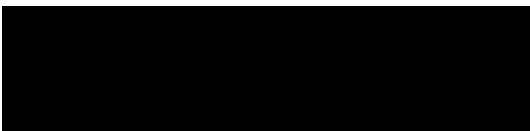
The Planning Inspectorate are invited to consider the visual impacts of the proposed Mona Offshore Wind Farm project and its interrelationship/ intervisibility between the other various projects in the western Irish Sea. It is noted that the EIAR which forms part of the Oriel application states that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

Project developers in the western 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 Mona 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 western 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.

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,

A large black rectangular redaction box covering the signature area.

Wendy Bagnall,

On behalf of Padraig Maguire, Senior Planner, Planning Department, Meath County Council.