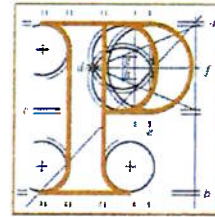


Our Case Number: ABP-319866-24

Planning Authority Reference Number:



**An
Bord
Pleanála**

Bryn Edwards
11 The Laurels
Harbour Road
Balbriggan
Co. Dublin

Date: 16 August 2024

Re: Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm
Located off the coast of Counties Dublin, Meath and Louth (www.northirishsearraysid.ie)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission and fee in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of Dublin City, Fingal, Meath and Louth County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to marine infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email marine@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,


Ellen Moss
Executive Officer
Direct Line: 01-8737285

OA03

Tel	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

I am writing to formally lodge an objection to the proposed offshore wind turbine development off Skerries and Balbriggan, Ref. OA29N.319866, on behalf of People Before Profit Fingal.

Postal Address

Bryn Edwards
11 The Laurels
Harbour Road
Balbriggan

Our concerns focus specifically on the potential impact on sensitive and key breeding and nesting sites for a diverse range of bird species. We additionally have concerns about the visual impact of turbines that are so close to the shoreline. We urge an ecosystems-based analysis of the impacts of this proposal, allied with the multiple other projects proposed on the East coast.

People Before Profit Fingal have grave concerns regarding the possible impact of the proposed developments on bird, marine life, and biodiversity levels. We support the development of offshore wind energy as an urgent and vital necessity in reducing our reliance on fossil fuels and in tackling the state's CO2 emissions. However, we believe this should be done by the state and not by private, for-profit developers. We oppose what is effectively the privatisation of the country's natural wind energy and are sceptical about whether it will lead to any benefits for the people of Ireland. Many of the issues we and others have with this specific development are directly caused by the prioritisation of profit over the long-term sustainable development of natural resources, especially in relation to the location of turbines and their distance from the shore.

As one of the "relevant projects," the site was developer-chosen, and its development is not in line with sustainable development or best practice in marine spatial development. We call for all turbines to be placed a minimum of 22 km from shore, in line with best practice in the rest of the EU. We note in passing that the proposers' public consultation events, held in Bracken Court Balbriggan, did not give the public an accurate scaled view of the visual impact this array would have when viewed from Skerries or Balbriggan, and we would urge the company to hold further public consultations where the true scale and visual impact are fully explained to the public.

Site location for offshore wind energy should, as part of proper marine spatial planning, take account of current technological developments, specifically around floating turbine potential, and utilise an ecosystem-based approach to the proposed development's environmental impact. Instead, this array, like others, is developer-led and seems to prioritise locations and turbine placement based on onshore grid availability and NOT best environmental outcomes or least damaging impact.

We are not reassured by the proposer's EIAR and feel that many concerns related to the impacts on bird species and marine life are underplayed and not fully acknowledged in the EIAR. We echo calls made by others for a more thorough independent assessment to be made of the probable impacts on marine and bird life and biodiversity. We do not believe that the current proposals, mitigation measures, or EIAR are in compliance with good marine

spatial planning. We note the limited number of bird species tracked in the proposer's EIAR and request that further investigation of additional key species is included in further impact assessments.

The EU's Birds and Habitats Directive requires member states to protect species of EU importance throughout their natural range within the EU (Articles 5 and 12 of the Habitats Directive). It is clear that the siting of this array so close to Rockabill SPA could have immense consequences for many bird species, some of whom are red- and amber-listed.

The EU's Maritime Spatial Planning Directive (2014) places a requirement that the state prepare ecosystem-based plans for their marine areas by 2021. Allowing such developer-led projects to proceed with no overall attempt to ascertain the cumulative impacts on bird and marine life of multiple such projects is a flagrant breach of such a directive, as well as a dereliction of duty to protect already under-pressure species.

We would ask the Bord to consider whether the processing of this application, given the fact that the site was developer-chosen and in the absence of an ecosystems approach to marine spatial planning, may mean that multiple EU directives have been disregarded by the state in this process, including the Marine Strategy Framework Directive (2008/56/EC), the Birds Directive (2009/147/EC), the Habitats Directive (92/43/EEC), the Strategic Environmental Assessment Directive (2001/42/EC), the Environmental Impact Assessment Directive (2011/92/EU), and the EU Maritime Spatial Planning Directive (2014/89/EU).

Concerns regarding Statkraft's Environmental Impact Assessment:

A recent seabird count survey (2023) has indicated that there is a decline in Kittiwake populations. One reason for this is a shortage of food during the breeding season. Construction of wind farms such as NISA, allied with the multiple other wind farms proposed and with the attendant removal of millions of tonnes of rock and sand in the development stage, has huge potential to further impact the food chain upon which many red- and amber-listed species rely.

We further note that little assessment is made in the EIAR of the potential damage to the ability of the marine area in question to continue to act as a carbon sink, and it seems little effort has been made to calculate the potential harm to the Irish sea's continued functioning as a carbon sink. We have concerns that the assessment of impacts study conducted by the proposers is not in line with an overall ecosystem approach and does not fully take into account the impacts of the installation and building of the turbines on marine life and biodiversity important sites.

We note that one study in *Nature* (<https://www.nature.com/articles/s44183-022-00003-5>) highlights this issue, stating:

"The adopted plans (for offshore wind energy) should apply an ecosystem-based approach, ensuring that the pressures exerted by maritime activities do not compromise the achievement of a healthy ocean and the resilience of marine ecosystems, and their ability to sustainably supply marine goods and services... our reviews have highlighted that environmental impacts and MSP aspects are still poorly addressed in OWE planning."

The study goes on to note:

"It is therefore fundamental to consider the spatial and temporal distribution of the most sensitive species when determining the risks associated with a given project. For the adoption of such an approach, better data is required on species distribution and abundance over annual cycles and on the migration routes of birds, fish, and marine mammals."

It does not appear that the proposers have done this in this case.

While correctly noting the numerous sites of Special Protection Areas (SPAs) adjacent to or possibly impacted by the proposed development (including Rockabill, Lambay and Skerries SPA), the EIA concludes that *"All construction phase potential impacts were deemed as not significant in EIA terms."* They further claim that *"All operational phase impacts were deemed as not significant in EIA terms."*

It strains credibility that the erection of 49 turbines in an ecologically sensitive and key area for feeding and nesting can be dismissed so lightly. The EIA finally concludes by stating: *"As the impact assessment deemed the significance of all of the impacts to be not significant in EIA terms, no additional mitigation measures are considered necessary and residual effects remain as not significant in EIA terms."*

We believe this to be wholly inadequate for the reasons outlined earlier and see this as an utter failure to address the impacts on bird species in any meaningful or ecosystem-based manner.

At the very minimum, we believe the proposers must conduct more detailed surveys and tracking of species that use the SPA to nest and forage. While some species were tracked (Kittiwake, Shag, Guillemot and Razorbill), we believe this list to be inadequate and a fuller survey and assessment of all species affected should be ordered.

We would also have concerns about the proposed monitoring group for all East Coast developments: *"The ECMG group is made up of the developers of the five east coast Phase One projects (Oriel Wind Park, NISA Wind Farm, Dublin Array Offshore Wind Farm, Codling Wind Park, and Arklow Bank Phase)."*

While state statutory and regulatory bodies will have some role in ascertaining negative impacts in their jurisdiction areas, we would strongly warn against a monitoring group that is comprised of private developers as the potential for conflicts of interest arises. Such a group must have voices from local communities, fisheries, local authorities and environmental groups at its heart.

In conclusion, we urge:

- The Bord to insist the array is placed at a minimum of 22 km from shore.
- That the developers hold further public consultations with communities and give accurate visual representation of the development when built.
- That any monitoring group includes community and environmental groups in key roles.
- That an ecosystem-based EIA is conducted with greater examination of all species of wildlife affected.

- That consideration be given to increasing the distance of any turbines from SPAs, given the use of feeding grounds by migratory species, many of whom face declining populations and struggles to locate food.

We echo and here quote the concerns of Birdwatch Ireland, who note that over 95% of breeding seabirds are listed on the International Union for Conservation of Nature's (IUCN) Red and Amber list of threatened species. They list their specific concerns around offshore wind farms as:

Collision morbidity – birds colliding with the rotor blades, towers, nacelles and other infrastructure.

Disturbance and displacement – particularly during the construction and operation of offshore wind parks where birds avoid an area due to noise or visual intrusion.

Barrier effect – wind parks increase energy expenditure by seabirds, which will have to fly further to avoid parks. Raising a bird's energy expenditure decreases its chance of survival on migration and its ability to successfully feed chicks during the breeding season.

Habitat loss or damage – the presence of wind park infrastructure within the feeding area of a seabird population will have a significant detrimental impact. Wind park infrastructure and operation could also affect the movement and navigation of other marine species, including species of fish, crabs, and shellfish. These species are particularly sensitive to electro or magnetic fields, and their disruption could have far-reaching consequences on marine ecosystems.

Considering the overall declining health of our oceans, which play a crucial role in climate mitigation, it would be a tragedy if we do not ensure that the highest standards are applied to any proposed development. It is essential that all possible measures are taken to minimise the impacts on already vulnerable species and ecosystems.

Finally, it is important to note that the existing offshore wind farm at Arklow was granted a Dumping at Sea license in 2017 for the use of a sea plough to remove 99,999 tonnes of material that had accumulated around the bases of the turbines, which were constructed with monopile foundations. Given that this situation involved a relatively small number of turbines of much smaller size than those proposed in the NISA project, it is likely that much greater volumes of material will accumulate at the turbine sites in NISA. Therefore, we strongly urge that the impact on feeding grounds and biodiversity be thoroughly ascertained and studied, especially given the proximity of multiple Special Protection Areas (SPAs) to this site.