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**Isle of Man Harbours**

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Your ref: ABP-319866-24  
Date: 25<sup>th</sup> October 2024

Dear An Bord Pleanála

**Re: Proposed Development known as North Irish Sea Array (NISA) Offshore Wind Farm Located off the Coast of Counties Dublin, Meath and Louth**  
**Case Number: ABP-319866-24**

Thank you for your letter dated 26 June 2024 regarding the Marine Development Application (MDA) for the proposed North Irish Sea Array (NISA) Project, providing the Isle of Man Government (as a consultee) with the opportunity to review and comment on the application. This letter is a response from the Territorial Sea Committee (TSC) made up of representatives of a number of Departments and Statutory Boards of the Isle of Man Government.

The TSC found it a useful and interesting set of documents and await the associates outcomes and future opportunity to comment as the project advances. The TSC is of the opinion that the Isle of Man should be identified as one of the main stakeholders given the proximity to the Manx territorial limits. Thank you for affording us with the opportunity to consider and provide comments on the above.

The MDA, provides a good overview of what will be undertaken at this stage of the project. The TSC is satisfied from the information in these documents that all international environmental standards and best practice will be adhered to when undertaking the collection and analysis of the data obtained from within the proposed development area, and will ensure appropriate mitigation measures are in place to address any concerns identified throughout the Environmental Assessments process.

Whilst the Isle of Man is not a member of the EU and is therefore not directly covered by most European directives, the Isle of Man still follows relevant European environmental safeguards and expects best practice to be followed. The Isle of Man also meets its obligations under both the Bonn and the Bern Conventions, via statutory instruments, specifically the Wildlife Act 1990. As part of this, the TSC would request that appropriate consideration is given to the species which are protected under this Act, and ensure that there are no detrimental impacts on these species as part of this proposed project. In addition, the same would be requested in respect of the marine protected sites and the manner in which these are designated and managed, including any transboundary impacts arising from the project.

It is noted that the cumulative effects will be thoroughly investigated. However, of particular importance and concern would be the habitats and species found within Isle of Man waters, particularly those protected under Manx Law<sup>1</sup> or identified as threatened or declining by the OSPAR Convention, and which may be affected by the proposed developments. Comments included below and attached request the inclusion of relevant, island-based conservation organisations which may also have relevant information and data of interest to the project. Any marine developments within or adjacent to the Isle of Man territorial waters could potentially impact commercial fisheries in Manx waters so it would be appreciated if the relevant fishing organisations on the Island were included as consultees via the appointed Fisheries Liaison Officer.

The above proposal also has the possibility for potential trans-boundary impacts on Manx land/seascapes and the TSC would particularly like to ensure that the impacts on wildlife/habitat conservation and fisheries in Manx water are fully considered within the scope of this assessment developments. We would request that the impact on infrastructure and transport activities, including but not limited to, Manx shipping and navigation and aviation interests, including airport radar issues are also fully considered.

#### **Ørsted's proposed Offshore Wind Farm (OWF) Agreement for Lease (AFL)**

The TSC wishes to point out that there is an AFL with Ørsted for an OWF, the proposed Moir Vannin Offshore Windfarm, within Isle of Man territorial waters. The TSC advises that this is something that might need to be taken into account as part of the consideration of cumulative impact assessment and any impact on shipping routes around the Isle of Man.

#### **Crogga Hydrocarbon site**

The Department of Infrastructure (DOI) has issued a Seaward Production Innovate Licence to Crogga Limited in respect of the hydrocarbon block 112/25. This licence commenced on 1 January 2019. Further details on this can be supplied if considered appropriate.

#### **Marine Navigation**

As an Island nation, any significant risk of interference with marine navigation is of concern to the TSC with regard to transport to and from the Island, and shipping lanes in out territorial waters which are used to connect the UK and Ireland. The TSC suggests continued engagement with the Isle of Man Steam Packet Company to ensure that there are no impacts to the well established shipping routes from the Island to Ireland.

#### **Data Sources**

The TSC would draw the applicant's attention to the Manx Marine Environmental Assessment<sup>2</sup> (MMEA) which provides a useful overview of the Island's marine environment and should be taken into account as part of both the transboundary and possibly also the cumulative impacts assessment as part of this application. More detail will be provided below in respect of specific areas of the MMEA that should be reviewed. The TSC also notes in the comments provided that there has been requests to use more up to date data sources where they are available.

In addition to this broad statement, the TSC has provided specific comments, over subsequent pages, in relation to the individual chapters of the MDA, and collated on behalf of various contributors within the responsible Departments of the Isle of Man Government.

The TSC would welcome the opportunity for continued involvement in the process.

Should you require any further information or clarification on any of the comments of this response, then please do not hesitate to contact myself, and I can raise any items with members of the TSC.

Yours sincerely



David Gooberman  
Chair, Territorial Sea Committee

1 Wildlife Act 1990

([http://www.legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/1990/1990-0002/WildlifeAct1990\\_2.pdf](http://www.legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/1990/1990-0002/WildlifeAct1990_2.pdf))

2<https://www.gov.im/about-the-government/departments/infrastructure/harbours-information/territorial-seas/manx-marine-environmental-assessment/>

