



codling
wind park

EIAR Addendum

Appendix 10-D Baseline
and contemporary data
comparison



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1 Introduction

1. Codling Wind Park Limited (hereafter 'the Applicant') is proposing to develop the Codling Wind Park (CWP) Project, which is located in the Irish sea approximately 13 - 22 km off the east coast of Ireland, at County Wicklow.
2. On Friday 6th September 2024 CWPL (referred to hereafter as the 'Applicant') applied for planning permission to An Coimisiún Pleanála (ACP) (referred to hereafter as the 'Commission') under Section 291 of the Planning and Development Act (PDA) 2000, as amended, for the construction, operation and decommissioning of the CWP Project.
3. On 1st August 2025, having reviewed the application documentation, including the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS), the Commission issued a Further Information Request (FIR) in relation to the CWP Project.
4. This appendix forms part of the Applicant's response to Item 7d of the Commission's FIR and supported **Section 10** of the **EIAR Addendum**. Specifically, this appendix provides a direct comparison between contemporary ornithological data collected during 2024 and 2025 and baseline data collected for the EIAR between 2019 and 2022. The purpose of the document is to demonstrate, through comparison, that the data provided with the planning application remain valid and robust for characterising the receiving environment to inform EIA and Habitats Directive assessments.
5. Comparisons are drawn between baseline and contemporary Digital Aerial Survey (DAS) data, with both estimated abundances (used to inform the displacement assessment) and flight densities (used to inform the collision risk assessment), as well as baseline and contemporary intertidal data (including post-breeding tern roost counts).

2 Digital aerial survey data

6. Baseline data were collected utilising a DAS methodology, wherein high-resolution imagery is captured using cameras mounted to aircraft that overfly transects across the array site plus a 2 km buffer. The DAS methodology is outlined in **Volume 4, Appendix 10.5 Offshore Ornithology Baseline Characterisation Report** of the EIAR. **Sections 2.1** and **2.2** below provide comparisons between the estimated seasonal peak abundances and the estimated flight densities of birds recorded within the array site plus a 2 km buffer respectively.

2.1 Seasonal peak abundances

7. **Table 1** shows a comparison of estimated abundance within the array site + 2 km buffer between the baseline characterisation dataset (**Volume 4, Appendix 10.5 *ibid***) and April to October 2025 data. In **Table 1**, estimates of 2024 to 2025 estimated species abundance which are lower than what was recorded during the baseline survey campaign are indicated with green cells. Unshaded cells indicate no change in estimated abundance between both datasets (and generally indicates no individuals recorded within the array plus 2 km buffer for that species within the given season).

Table 1 Comparison of estimated abundance within the array site + 2 km buffer between the baseline dataset and April to October 2025 data (B = breeding; NB = non-breeding; PBM = post-breeding migration; RM = return migration).

Abundance within array site + 2 km buffer								
Species	April 24 to Oct 25				Baseline			
	B	NB	PBM	RM	B	NB	PBM	RM
Guillemot	300.47	445.73	N/A	N/A	3623.79	13340.16	N/A	N/A
Gannet	24.71	N/A	5.86	26.01	104.88	N/A	55.35	104.88
Kittiwake	52.34	N/A	97.74	74.70	543.04	N/A	1362.96	585.80
Manx shearwater	144.04	N/A	29.01	77.25	180.16	N/A	1125.06	780.41
Great northern diver	0.00	3.78	0.00	9.39	0.00	14.72	2.91	11.66
Puffin	10.28	0.00	6.94	0.00	93.75	44.56	55.31	6.45
Razorbill	167.14	514.40	1365.65	44.77	674.58	640.38	4360.13	409.28
Red-throated diver	0.00	34.15	0.00	53.05	5.83	186.40	52.64	136.62

- In all cases, the estimated abundance of each species assessed for displacement was either lower in the 2024 to 2025 dataset or was unchanged from a count of zero individuals for the given season. This validates the original dataset, and the seasonal abundances presented within the EIAR remain valid. Assessments based upon seasonal abundances within the EIAR and NIS remain precautionary, and the associated conclusions are proven beyond reasonable scientific doubt. The recent data are not meaningfully different, and furthermore, the application predicted greater proportional impacts than would be the case if the more recent seasonal abundance were used.

2.2 Flight densities

- In order to inform the impact assessment in relation to collision risk, flight densities of seabirds within the array site plus a 2 km buffer have been estimated from baseline survey data, utilising the methodology which is provided in **Volume 4, Appendix 10.5**. Estimated flight densities are given in individuals per km². Estimated flight densities have also been calculated for seabirds recorded during the 2024/2025 DAS campaign and a comparison between estimated flight densities from the original baseline dataset and the 2024/2025 DAS campaign is provided in **Table 2**, below.
- In **Table 2**, estimates of species flight density which are lower than those recorded during the baseline surveys are indicated with green shaded cells. Estimates of flight density which were found to be greater than those estimated during the baseline survey campaign are indicated with amber shaded cells. Unshaded cells indicate no change in flight density between both datasets (and generally indicates no flight activity within the array plus 2 km buffer for that species within the given month).

Table 2 Comparison between baseline and updated DAS datasets of the monthly estimated flight densities of seabird species within the array area + 2 km buffer

Species	Dataset	January	February	March	April	May	June	July	August	September	October	November	December
Arctic tern	Updated	0.000	0.000	0.000	0.000	0.025	0.000	0.000	0.081	6.235	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.050	0.041	0.008	0.041	0.489	0.017	0.000	0.000	0.000
Little tern	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Black-headed gull	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.050	0.000	0.050	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.026
Common gull	Updated	0.025	0.025	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.051	0.000
	Baseline	0.050	0.150	0.067	0.000	0.000	0.000	0.000	0.000	0.001	0.000	0.076	0.103
Common tern	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.012	0.420	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.134	0.017	0.084	1.825	0.727	0.000	0.000	0.000
Great black-backed gull	Updated	0.000	0.000	0.000	0.000	0.013	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.192	0.000	0.000	0.000	0.000	0.000	0.000	0.025
Gannet	Updated	0.000	0.025	0.000	0.025	0.050	0.012	0.025	0.038	0.000	0.076	0.000	0.049
	Baseline	0.150	0.050	0.033	0.075	0.175	0.025	0.025	0.025	0.075	0.025	0.075	0.200
Herring gull	Updated	0.025	0.000	0.050	0.000	0.000	0.038	0.012	0.100	0.000	0.000	0.000	0.026
	Baseline	0.000	0.100	0.033	0.025	0.876	0.000	0.025	0.150	0.000	0.000	0.001	0.025
Kittiwake	Updated	0.199	0.151	0.025	0.050	0.148	0.163	0.138	0.087	0.125	0.199	0.125	0.302
	Baseline	1.101	0.801	0.767	0.576	1.401	0.676	0.841	1.110	0.223	0.926	2.024	3.773
Lesser black-backed gull	Updated	0.000	0.025	0.025	0.000	0.000	0.000	0.000	0.025	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.017	0.025	0.033	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Little gull	Updated	0.051	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.025	0.126	0.302
Red-throated diver	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Roseate tern	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.076	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Sandwich tern	Updated	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Baseline	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.029	0.007	0.000	0.000	0.000

11. In most cases where 2024 to 2025 DAS data recorded higher estimated flight densities, the difference is slight and can be attributed to one to two additional individuals within the surveyed area. The exception to this is Arctic tern, in which more birds were recorded from the September survey than during the baseline survey campaign (indicated with a red outline to the cells in **Table 2**).
12. In general, however, estimated flight densities were either no different (with no birds being recorded during a given month for the respective survey campaigns) or lower during the 2024 to 2025 DAS campaign than from the baseline dataset. When translated through to collision risk or displacement estimates, the likely difference for all amber cells (where there is a slight difference between the baseline and recent surveys) is a difference of less than 2-3 decimal places which will not materially alter any of the conclusions. Whilst Arctic tern is markedly different between the two survey campaigns, the impact for this species remains insignificant. It is assumed that the higher count of this species during the September 2024 DAS is attributable to a migratory pulse. September coincides with the Arctic tern post-breeding migration period (Furness, 2015) and the level of activity recorded is consistent with a transient migratory movement, and is not reflective of the levels of flight activity for this species within the region throughout the breeding period.
13. The original data therefore remain valid, along with the flight densities presented within the EIAR. The updated dataset also allows the conclusion to be drawn that assessments which employed the flight densities within the EIAR and NIS are also precautionary, as are the associated conclusions (beyond reasonable scientific doubt). The application predicted either greater proportional impacts than would be the case if the more recent flight densities were used or proportional impacts that would not be meaningfully different.

2.3 Conclusion

14. For the offshore environment, in the case of both estimated seabird abundance (which forms the bases of the displacement assessment) and estimated flight density (which forms the basis of the collision assessment), there is a general tendency towards there being fewer birds present both on the sea and in flight within the array site plus a 2 km buffer during the 2024 to 2025 DAS campaign than during the 2019 to 2022 baseline survey campaign, upon which the original quantitative assessments were based. This means that the original data were robust, and remain valid, the assessments were precautionary, and the associated conclusions beyond reasonable scientific doubt.

3 Intertidal data

3.1 Intertidal waterbirds

15. Baseline intertidal data was collected approximately twice monthly (excluding April 2020 and early May 2020) between October 2019 and March 2023. Eighty-one diurnal surveys were undertaken in total, using an adapted I-WeBS methodology (see **Volume 5, Appendix 10.5** of the EIAR). The survey area covered the OECC intertidal landfall area and a wider area within South Dublin Bay between the Great South Wall of Dublin Port and the north-west wall of Dun Laoghaire Harbour.
16. Contemporary baseline intertidal data was collected twice monthly (excluding January 2025) between January 2025 and January 2026. The same methodology as the baseline intertidal data collection was used.
17. **Table 3** shows a comparison of the intertidal waterbird species counts between the baseline dataset and the contemporary dataset for months of January to October. The range of counts recorded in each month is shown. These numbers represent the numbers of individuals recorded within the total survey

area (and are therefore inclusive of individuals within the Planning Application Boundary (PAB) as it lies within the survey area, as well as individuals within the survey area, but not located within the portion of the PAB located within the survey area). The mitigation period (i.e. the period during which construction works within the intertidal zone in South Dublin Bay will be restricted) will be during the period from September to mid-April and is indicated in the table by dark borders (a dashed line has been used for April to indicate that mitigation is only applicable during the first half of the month). Cells which are shaded amber indicate months in which contemporary surveys observed a higher maximum number of birds than observed during the baseline period. Green shaded cells indicate months where the baseline surveys recorded more birds and unshaded cells indicate no difference.

18. Data for the month of January represent January 2025 only. January 2026 data can be found in **Appendix 10-F Intertidal Waterbirds Survey Report 2025** of the **EIAR Addendum**, along with November and December 2025 data. Data collected during these months represent no material change to the baseline dataset. Furthermore, any material differences would be inconsequential, as mitigation dictates that no works will be carried out during these months within the intertidal zone.

Table 3 Comparison between baseline and updated intertidal monthly maximum counts for each species within South Dublin Bay

Species	Dataset	January*	February	March	April	May	June	July	August	September	October	November/ December
		Mitigation Period				Mitigation Period						
Light bellied brent goose	Baseline	7 - 446	13 - 299	11 - 68	1 - 412	0 - 0	0 - 0	0 - 0	0 - 0	0 - 164	4 - 213	Data collected during November and December 2025 support the conclusion that there is no material difference between the baseline and updated datasets. Analyses within the timescale for RFI item 7d were not possible, however raw count data for these months can be found in FIR Appendix 10-F of the EIA/R addendum.
	Updated	21	141 - 237	59 - 129	178	0	0	0	0	26	35 - 244	
Shelduck	Baseline	0 - 12	0 - 27	0 - 18	0 - 12	0 - 10	0 - 45	0 - 7	0 - 7	0 - 10	0 - 17	
	Updated	5	4 - 8	16 - 35	2 - 16	2 - 17	2 - 13	2 - 4	0 - 2	0 - 0	0 - 0	
Shoveler	Baseline	0	0	0	0	0	0	0	0	0	0	
	Updated	0	0	0	0	0	0	0	0	0	0	
Teal	Baseline	0 - 16	0 - 6	0 - 17	0	0	0	0	0	0 - 3	0 - 6	
	Updated	92	0 - 109	5 - 46	0 - 0	0 - 0	0 - 0	0 - 2	0 - 0	0 - 12	0 - 0	
Common scoter	Baseline	0 - 71	0 - 22	0 - 8	0 - 0	0 - 0	0 - 0	0 - 0	0 - 6	0 - 14	0 - 24	
	Updated	22	0 - 4	0 - 2	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 2	
Red-breasted merganser	Baseline	0 - 39	10 - 21	2 - 48	0 - 151	0 - 23	0 - 15	0 - 10	0 - 14	0 - 56	10 - 47	
	Updated	26	6 - 27	4 - 24	0 - 2	0 - 0	0 - 0	0 - 0	0 - 0	3 - 9	5 - 7	
Red-throated diver	Baseline	0 - 19	2 - 8	0 - 9	0 - 6	0 - 0	0 - 0	0 - 0	0 - 0	0 - 71	0 - 9	
	Updated	6	0 - 4	0 - 4	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 3	2 - 4	
Great crested grebe	Baseline	0 - 258	12 - 134	0 - 101	0 - 14	0 - 9	0 - 8	0 - 3	1 - 120	6 - 95	1 - 239	
	Updated	227	18 - 84	17 - 90	0 - 2	0 - 1	0 - 0	0 - 0	0 - 6	5 - 8	3 - 8	
Grey heron	Baseline	0 - 10	0 - 5	0 - 3	1 - 2	1 - 4	1 - 14	0 - 4	1 - 16	3 - 25	2 - 8	
	Updated	2	2 - 5	0 - 0	2 - 5	2 - 5	2 - 3	3 - 3	0 - 1	0 - 1	0 - 3	
Little egret	Baseline	0 - 7	0 - 9	0 - 2	2 - 12	6 - 15	5 - 21	2 - 12	1 - 20	1 - 90	0 - 37	
	Updated	0	1 - 3	0 - 2	0 - 20	0 - 17	5 - 11	3 - 27	3 - 4	0 - 0	0 - 10	
Shag	Baseline	0 - 53	0 - 7	0 - 18	0 - 2	3 - 10	0 - 10	0 - 16	1 - 26	1 - 36	1 - 14	
	Updated	161	3 - 290	2 - 8	5 - 33	2 - 3	1 - 2	1 - 2	0 - 35	6 - 19	5 - 9	
Cormorant	Baseline	0 - 17	1 - 37	0 - 12	2 - 6	0 - 5	0 - 11	2 - 16	3 - 26	3 - 18	1 - 15	
	Updated	5	2 - 4	4 - 20	5 - 5	1 - 10	3 - 5	1 - 14	14 - 27	12 - 21	14 - 14	
Oystercatcher	Baseline	480 - 2576	249 - 3677	118 - 1704	30 - 411	0 - 325	27 - 395	83 - 419	240 - 1195	858 - 1240	343 - 2790	
	Updated	34	561 - 635	813 - 1473	572 - 664	98 - 132	158 - 633	444 - 1117	226 - 399	56 - 700	47 - 1741	

Species	Dataset	January*	February	March	April	May	June	July	August	September	October	November/ December
		Mitigation Period								Mitigation Period		
Golden plover	Baseline	0 - 26	0 - 72	0 - 140	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 140	0 - 38	
	Updated	32	0 - 9	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 1000	
Grey plover	Baseline	0 - 38	0 - 10	0 - 10	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 15	0 - 5	
	Updated	0	0 - 21	0 - 3	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	
Ringed plover	Baseline	0 - 143	0 - 124	0 - 40	0 - 6	0 - 2	0 - 23	0 - 6	0 - 99	0 - 127	0 - 398	
	Updated	73	11 - 18	12 - 24	3 - 9	0 - 4	0 - 23	0 - 9	0 - 12	0 - 12	0 - 38	
Curlew	Baseline	0 - 138	0 - 92	0 - 91	2 - 32	0 - 1	0 - 41	2 - 93	6 - 189	2 - 191	0 - 116	
	Updated	2	46 - 54	87 - 108	3 - 52	0 - 7	0 - 10	0 - 53	39 - 79	5 - 7	0 - 43	
Bar-tailed godwit	Baseline	0 - 373	0 - 691	0 - 741	4 - 71	0 - 116	0 - 19	0 - 6	0 - 405	0 - 1164	0 - 344	
	Updated	249	782 - 1801	0 - 27	2 - 11	0 - 0	0 - 0	0 - 6	0 - 147	480 - 519	0 - 400	
Black-tailed godwit	Baseline	0 - 502	0 - 317	0 - 332	0 - 22	0 - 13	0 - 174	0 - 85	0 - 587	0 - 589	0 - 218	
	Updated	0	1250 - 1884	1116 - 1127	0 - 0	0 - 0	0 - 1	0 - 198	0 - 1364	0 - 133	0 - 38	
Turnstone	Baseline	0 - 154	21 - 110	7 - 124	14 - 52	0 - 16	0 - 38	0 - 28	2 - 262	24 - 110	39 - 188	
	Updated	56	55 - 65	32 - 49	27 - 60	5 - 19	6 - 7	10 - 11	11 - 16	9 - 31	20 - 40	
Knot	Baseline	0 - 6600	0 - 5716	0 - 5700	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 193	0 - 8590	
	Updated	18	850 - 2887	0 - 1	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 350	0 - 1700	
Sanderling	Baseline	0 - 269	0 - 143	0 - 60	0 - 39	0 - 11	0 - 6	0 - 0	0 - 19	0 - 144	0 - 147	
	Updated	0	30 - 85	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 57	0 - 37	0 - 106	
Dunlin	Baseline	0 - 3081	0 - 5495	0 - 1095	0 - 0	0 - 17	0 - 0	0 - 0	0 - 422	18 - 730	42 - 1010	
	Updated	67	571 - 1640	0 - 15	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0	0 - 4	118 - 600	
Redshank	Baseline	0 - 709	13 - 365	0 - 396	0 - 58	0 - 9	0 - 17	0 - 21	2 - 207	12 - 462	72 - 1337	
	Updated	92	4 - 60	13 - 48	30 - 78	6 - 8	0 - 15	0 - 211	0 - 74	0 - 0	58 - 280	
Greenshank	Baseline	0 - 109	0 - 5	0 - 8	0 - 5	0 - 0	0 - 3	0 - 0	0 - 8	0 - 21	0 - 14	
	Updated	4	0 - 4	0 - 0	0 - 1	0 - 0	0 - 5	4 - 59	0 - 20	0 - 0	0 - 1	
Black-headed gull	Baseline	114 - 2249	419 - 1648	160 - 2460	0 - 98	2 - 50	50 - 620	314 - 2128	323 - 1671	289 - 3826	217 - 3192	
	Updated	1812	947 - 985	581 - 886	155 - 665	41 - 130	81 - 499	523 - 1064	646 - 1443	99 - 537	27 - 606	

Species	Dataset	January*	February	March	April	May	June	July	August	September	October	November/ December
		Mitigation Period								Mitigation Period		
Mediterranean gull	Baseline	0 - 33	0 - 4	0 - 16	0 - 4	0 - 21	0 - 51	4 - 87	20 - 72	0 - 41	0 - 54	
	Updated	0	0 - 1	0 - 0	0 - 2	0 - 0	1 - 4	21 - 44	0 - 4	0 - 0	0 - 0	
Common gull	Baseline	0 - 213	13 - 302	11 - 389	1 - 46	1 - 3	3 - 25	0 - 45	7 - 77	0 - 57	11 - 220	
	Updated	42	19 - 121	23 - 50	9 - 95	2 - 10	2 - 22	51 - 75	2 - 31	0 - 1	0 - 11	
Great black-backed gull	Baseline	0 - 85	3 - 41	10 - 31	2 - 49	4 - 35	8 - 109	0 - 22	28 - 227	17 - 100	4 - 241	
	Updated	6	7 - 22	5 - 45	2 - 83	4 - 30	2 - 60	23 - 76	6 - 31	4 - 8	2 - 4	
Herring gull	Baseline	0 - 442	66 - 1089	44 - 311	43 - 296	14 - 501	184 - 687	111 - 562	146 - 2058	23 - 940	66 - 5646	
	Updated	34	53 - 387	38 - 791	11 - 2639	163 - 974	172 - 850	292 - 639	36 - 1729	27 - 188	19 - 245	
Lesser black-backed gull	Baseline	0 - 4	0 - 24	0 - 18	5 - 28	0 - 12	6 - 67	2 - 46	12 - 150	1 - 28	0 - 48	
	Updated	0	0 - 1	0 - 20	0 - 21	0 - 15	1 - 10	16 - 30	8 - 94	0 - 2	0 - 4	
Sandwich tern	Baseline	0 - 0	0 - 0	0 - 13	0 - 172	0 - 2	0 - 20	4 - 51	42 - 231	0 - 24	0 - 38	
	Updated	0	0 - 0	0 - 3	34 - 53	0 - 4	0 - 1	2 - 8	13 - 26	0 - 1	0 - 0	
(Sterna tern spp.)	Baseline	0	0	0	0 - 2	0 - 19	0 - 6	9 - 497	19 - 265	0 - 64	0	
	Updated	0	0	0	0 - 5	0 - 18	15 - 18	1 - 61	0 - 141	0	0 - 1	
Black guillemot	Baseline	0 - 32	2 - 9	1 - 12	0 - 4	5 - 7	0 - 10	0 - 7	2 - 18	0 - 24	0 - 14	
	Updated	3	4 - 5	4 - 5	2 - 4	0 - 4	4 - 8	1 - 5	0 - 2	1 - 3	2 - 3	

*Data for the month of January represent January 2026 of the updated survey period only (hence a single number is presented). January 2026 data can be found in **Table 6** of Appendix A.1, below.

19. For the majority of months and for the majority of species, baseline intertidal surveys recorded more birds than the contemporary intertidal surveys. There are a few cases in which a higher number of birds were recorded in the contemporary intertidal surveys. However, for each of these cases the higher recorded numbers do not change the conclusions made from the baseline intertidal dataset. This is because:
- birds occur during the mitigation period (September to mid-April), during which time any potential impacts will be mitigated and therefore there is no pathway to disturbance;
 - birds are not located within species-specific disturbance ranges of the planning application boundary; or
 - although birds were observed within the planning application boundary, they were exhibiting foraging behaviours and only represented a small proportion of the species recorded that month, indicating that suitable alternative foraging areas were available.

Selected examples of where these conclusions have been made are presented in **Table 4**.

Table 4 Selected intertidal species comparison accounts

Species	Account
Light-bellied brent goose	143 light-bellied brent geese were recorded within the PAB region of the survey area in April 2025. However, this record was made on the 9 th of April 2025, during the proposed mitigation period any theoretical difference between surveyed values is therefore inconsequential in the context of the assessment.
Red-throated diver	No red-throated diver were recorded outwith the mitigation period during contemporary intertidal surveys. This is consistent with there having been no individuals recorded outwith the mitigation period during baseline surveys.
Oystercatcher	A total of 256 oystercatcher were recorded within the PAB region of the survey area during the May, June and August 2025. During the months of June and July, more oystercatchers were recorded from the contemporary surveys than from the baseline surveys. However, in each of these months all birds were observed foraging and a large number of birds were recorded outside the PAB, indicating that suitable alternative foraging areas were available. The peak non-mitigation period count of birds within the PAB region of the survey area (143 in August 2025) still represents <0.5% of the all-Ireland wintering population for this species (305 birds; Burke <i>et al.</i> , 2018).
Sanderling	41 records of sanderling were recorded in the PAB region of the intertidal survey area in August 2025. However, all individuals were foraging, and other birds were recorded outside the PAB (but within the intertidal survey area), indicating that suitable alternative foraging areas were available. Furthermore, this species is assessed as having low sensitivity to disturbance impacts (Cutts <i>et al.</i> , 2013).
Black-headed gull	Black-headed gulls were recorded within the PAB region of the intertidal survey area during the contemporary intertidal surveys, including 559 individuals in July 2025. However, all of these individuals were observed foraging and a large number of birds were recorded outside the PAB region of the survey area, but within the survey area of South Dublin Bay, indicating that suitable alternative foraging areas were available. Furthermore, gulls, including black-headed gull, have high tolerance to anthropogenic disturbance Goodship & Furness (2019).

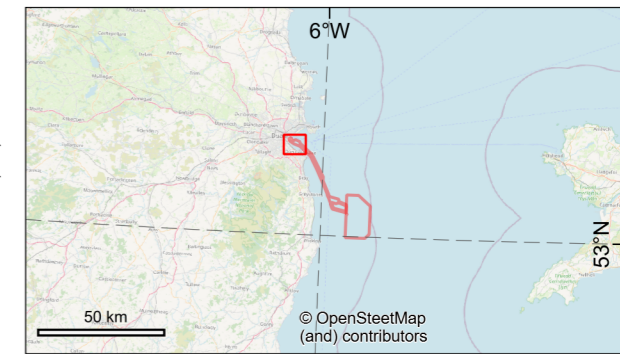
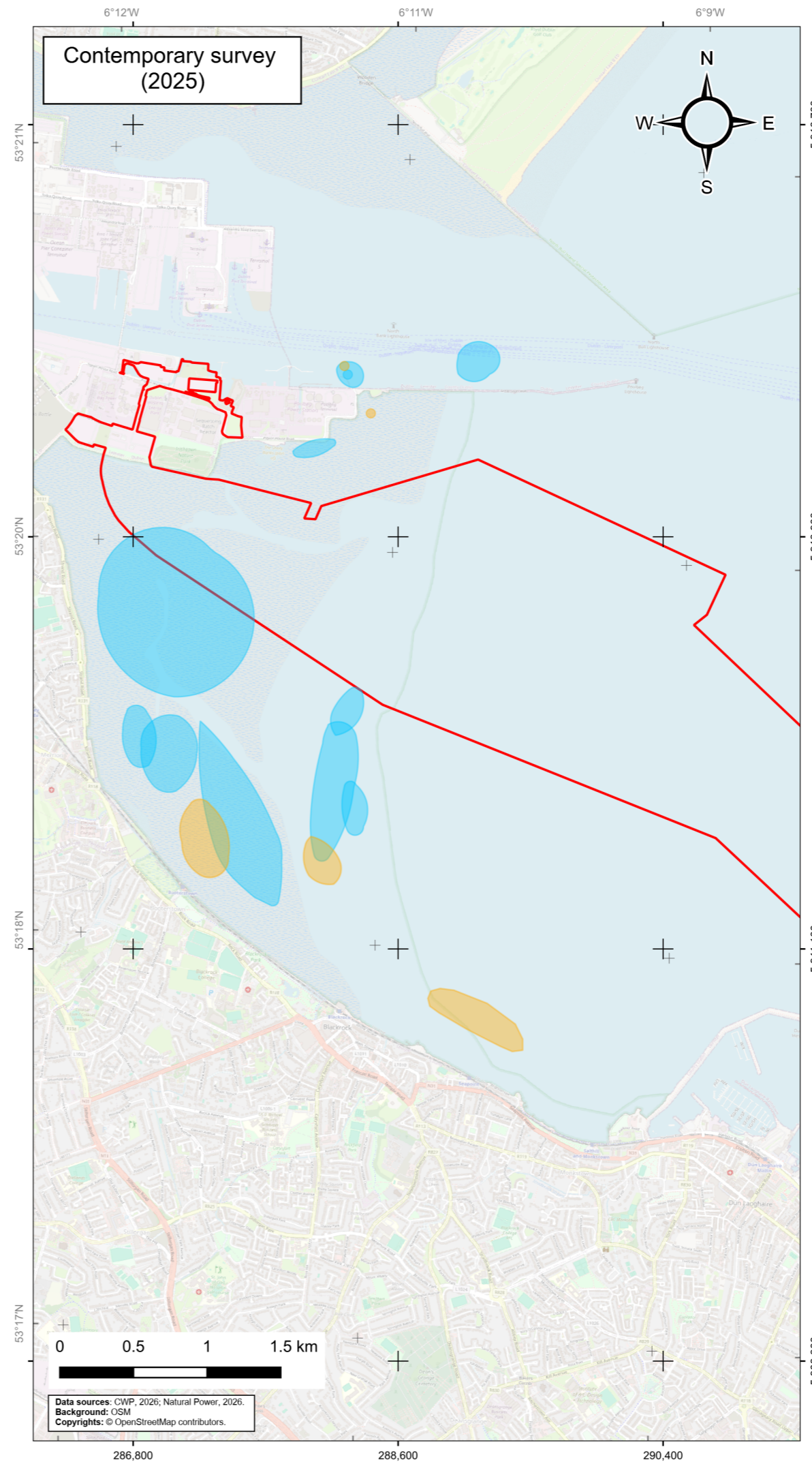
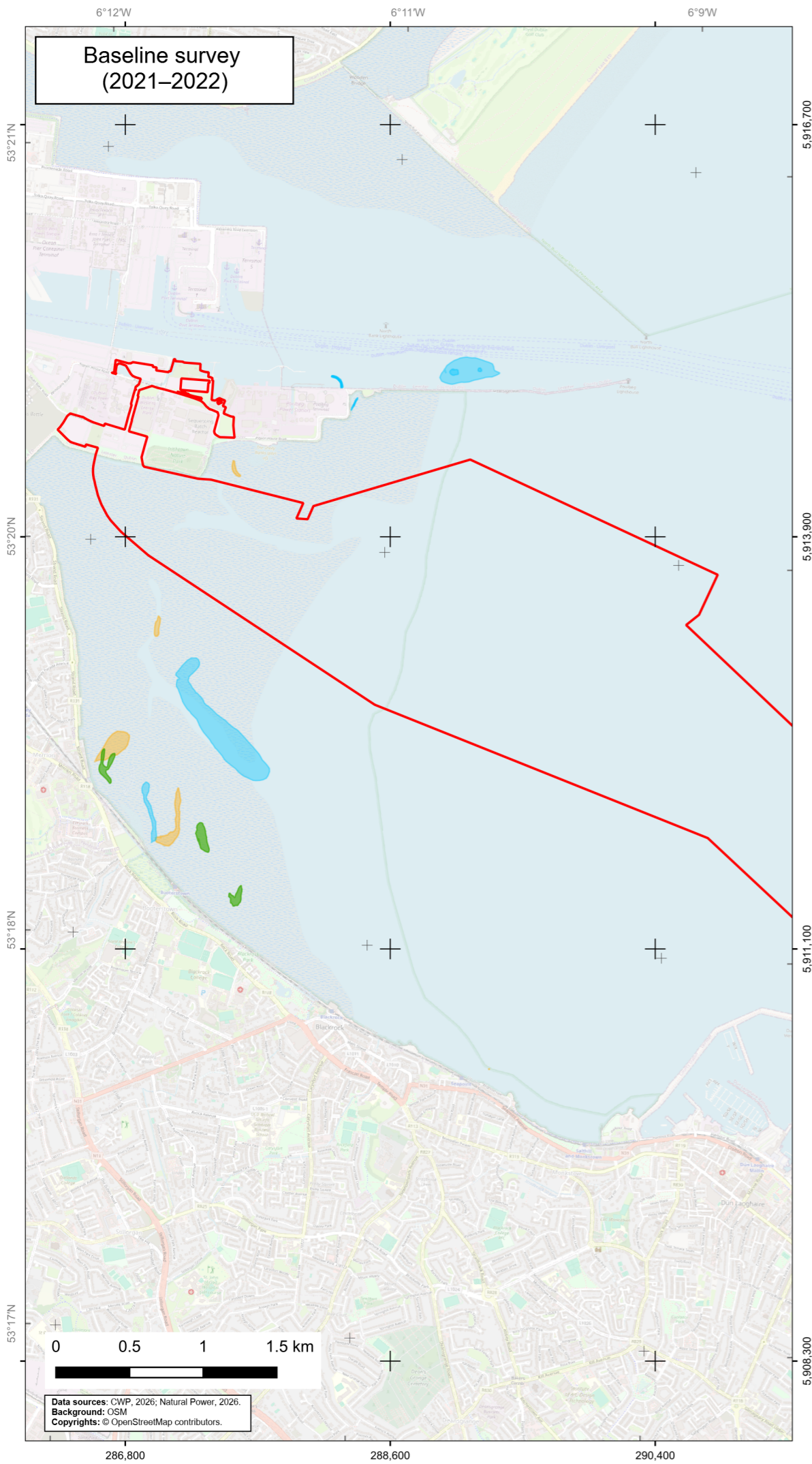
3.2 Post-breeding terns

20. Baseline dusk tern surveys were conducted in South Dublin Bay from mid-July to mid-September in 2020 and 2021 (four surveys each year). These surveys recorded the distribution and number of terns using post-breeding roost sites. A total of four contemporary post-breeding tern surveys were undertaken between July and September 2025 following the same methodology as the baseline surveys.
21. **Table 5** shows a comparison between baseline and contemporary crepuscular post-breeding tern surveys. Common, Arctic and roseate terns are three species of similar appearance within the genus *Sterna*, which can be difficult to accurately distinguish under low the light levels of the crepuscular periods during which roosting tern counts were undertaken. Differentiation of these species was therefore not generally possible. Consequently, these species are treated here collectively as *Sterna* species.

Table 5 Peak counts of tern species recorded during baseline and contemporary crepuscular post-breeding tern surveys

Species	Peak count	
	Baseline surveys (Jul – Sep 2020 and 2021)	Contemporary post breeding surveys (Jul – Sep 2025)
Sandwich tern	462	78
<i>Sterna</i> tern species	4,868	2,367
Black tern	4	2

22. For all tern species a higher peak count was recorded during the baseline post-breeding tern surveys than during the contemporary post-breeding tern surveys in 2025. The distribution of terns recorded is also similar between the two sets of surveys (see **Figure 1**). During the contemporary post-breeding tern surveys, a smaller number of terns were recorded within the planning application boundary than the baseline post-breeding tern surveys. That the original data therefore remain valid, the peak counts presented within the EIAR remain valid and the assessments that employed the peak counts within the EIAR and NIS were precautionary. The associated conclusions are made beyond reasonable scientific doubt. The application predicted either greater proportional impacts than would be the case if the more recent peak counts were used or proportional impacts that would not be meaningfully different.
23. Given the above, and the implementation of mitigation for roosting terns (i.e. construction work will cease within 1hr of sunset and not resume until 1hr after sunrise) (see **Volume 3, Chapter 10 Ornithology** of the EIAR), the conclusions of no significant effect remain valid.



Legend

- Planning Application Boundary (PAB)

Post-breeding tern roosting locations

- Sandwich tern
- Sterna tern
- Sandwich and Sterna tern

		Project: Codling Wind Park	Contractor: www.naturalpower.com		
Figure 1 Comparison between the baseline and contemporary staging terns					
CWP doc. number: CWP-NPC-CON-09-MAP-2149					
Internal descriptive code: N/A		Size: A3 Scale: 1:35,000	CRS: EPSG 25830		
Rev. 00	Updates For FIR submission	Date 2026/04/20	By AC	Chk'd FM/EA	App'd CM

3.3 Conclusion

24. For the intertidal and post-breeding tern surveys, more individuals of all species (and species groups) were recorded during the baseline surveys than during the contemporary surveys during the non-mitigation period. Where more birds were recorded during the contemporary surveys they were either during months where no construction work will take place (during the mitigation period), not within the planning application boundary or exhibiting foraging behaviour where there is suitable alternative habitat available if they were disturbed. For all species, the contemporary intertidal and post-breeding tern data validates the baseline data, and demonstrates there to be no meaningful difference between the application phase and validation survey datasets.

4 References

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Appendix A.1 Raw count data – DAS seabirds November 2025 to February 2026

29. **Table 6** provides raw DAS counts for seabirds species recorded during monthly visits from November 2025 to February 2026. Numbers of individuals recorded corroborate evidence gathered during winter 2024/2025 that numbers of birds are lower since baseline surveys were carried out, which further exemplifies the conservatism of the application assessment, which is based on a dataset which recorded, in general, more individuals within the region.

Table 6 Seabirds raw count DAS data - Winter 2025/2026. Array site plus 2 km buffer

Species	2025		2026	
	November	December	January	February
Black guillemot	3	1	0	2
Fulmar	0	1	0	0
Gannet	1	1	0	0
Great black-backed gull	2	0	0	0
Great northern diver	2	1	0	1
Guillemot	10	5	6	44
Herring gull	0	0	0	0
Kittiwake	32	13	24	27
Lesser black-backed gull	0	0	0	0
Little gull	1	1	0	9
Manx shearwater	0	0	0	1
Unidentified auk	1	7	5	5
Unidentified gull	2	0	0	0
Puffin	0	0	0	0
Razorbill	7	19	17	40
Red-throated diver	0	3	2	17
Shag	11	4	4	23