IWDG Irish Whale and Dolphin Group

Planning Inspectorate UK
Email: AwelyMor@planninginspectorate.gov.uk

1st November 2022

Dear Sir or Madam

Re: Plans of Development Awel y Mor windfarm(reference number 6.4.6.2)

The Irish Whale and Dolphin Group (IWDG) was established in December 1990 and is an All-Ireland group *"dedicated to the conservation and better understanding of cetaceans (whales, dolphins and porpoises) in Irish waters through study, education and interpretation".* While the IWDG is primarily concerned with cetaceans we have broadened our comments to include **all marine mammals**.

The waters of the North Coast of Wales for the proposed windfarm have been identified in the submission as important for harbor porpoise, minke whale, bottlenose, common and Risso's dolphins as well as grey seals. Bottlenose dolphins (*Tursiops truncatus*) in the UK and Ireland have been shown to have minimum dispersal distances of 1,227km (Robinson et al, 2012a). North Atlantic minke whales (*Balaenoptera acutorostrata*) perform large scale seasonal migrations from high latitude summer feeding grounds to lower latitude breeding grounds (Risch et al, 2014). Risso's dolphins have been matched with photo-id demonstrating movement between North Wales, Pembrokeshire and the Isle of Man (Felce, no date) and a possible match to an Irish Risso's has been suggested (Ryan and Klotzer, 2009). Therefore while movement across the Irish Sea of highly mobile species has not been well demonstrated to date, this is almost certainly occurring and thereby protection of species raises concerns that transgresses national boundaries.

IWDG welcomes the opportunity to comment on the development plans for the Awel y Mor windfarm and makes the following comments.

1. There is no apparent mention or consideration of noise abatement, apart from bubble curtains which are deemed to have negative impacts. Noise abatement would greatly reduce the impact of piling and especially of UXO clearance (when a mitigation plan is developed) and this is not considered. Noise abatement has been shown to reduce disturbance to below 8km from source (Dahl et al., 2014) and merits full and proper consideration to include all methods listed in Table 7 of Volume 4, Annex 7.2 Draft Outline Marine Mammal Mitigation Plan and should not be limited to bubble curtains.

The Irish Whale and Dolphin Group is dedicated to the conservation and better understanding of cetaceans (Whales, Dolphins and Porpoises) in Irish waters through study, education and interpretation.

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2. Soft starts for piling do not consider the fact that piling soft starts typically have a 5 dB difference between the start of soft start and full power at 750m from source (Robinson et al., 2012b).

3. The size of the required mitigation is unclear when discussed in points 25 and 26 of Volume 4, Annex 7.2 Draft Outline Marine Mammal Mitigation Plan which suggests it should be 640m for piles and 540m for pins but states the JNCC guidance is 500m. It is not clear which is being put forward and this is subject to final noise modeling. Without this information it is therefore difficult to know what will be applied. Therefore this information is required in the EIA prior to consultation.

4. The Marine Mammal Mitigation Plan is not clear on whether ADD use is recommended or not and if so how those ADDs may be used. Additionally each ADD operates in a specific frequency range and source level so these should really be specified in any mitigation plan, or at least ranges for this equipment. So it is difficult to comment on an unclear plan and this should be clear in the mitigation plan.

It is difficult to cover all issues in relation to this development and therefore we have decided to focus solely on noise and mitigation. We hope the comments are helpful and constructive.

Yours sincerely

Patrick Lyne IWDG
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