

**From:** [Attracta Uí Bhroin](#)  
**To:** [Morgan and Morecambe OWFTA](#)  
**Cc:** [Attracta Uí Bhroin](#); [ACG](#)  
**Subject:** Request to become an interested party - Morgan and Morecambe Offshore Wind Farms Transmission Assets  
**Date:** 11 April 2025 15:28:28

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Dear Si/Madame,

I wish to register to become an interested party in this project: Morgan and Morecambe Offshore Wind Farms Transmission Assets - which can be found here : <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032>

I wish to register interest in participating **in all phases of this project open to the public**, for to register interest in written comments for all the issue being considered on 30Apr -1 May. This is because it is at this stage impossible for me to find a breakdown of the issues being considered on 30Apr -1 May as there is no link to the annex E referenced in the website text on the deadlines here:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032/examination-timetable>

In particular I wish our concerns to be considered in respect of:

- issues with the process for transboundary consultation;
- impacts on ecology in particular marine species and birds,
- the marine environment generally,
- the atmosphere,
- climate,
- impacts on protected sites and species and cumulative impacts, and impacts on fishers and fish stocks,
- the risks associated with such deployments given the complex and sensitive geo-political world situation and the potential for it to attract sonar activity and indeed sabotage and the resulting direct and indirect impacts.

I wish to register on my own behalf as a member of the Irish public and also on behalf of eNGOs Environmental Law Ireland at An Taisce, and also An Claíomh Glas.

Please confirm this is in order and thank-you for your assistance in this matter

Yours sincerely

**[REDACTED] Law Officer Environmental Law Ireland at An Taisce,  
and Vice Chair of An Claíomh Glas, and in a personal capacity - as cc'd**

# Transboundary Consultation on Morgan and Morecambe Offshore Wind Farms Transmission Assets

**Date: 11<sup>th</sup> April 2025.**

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## Introduction

The following submission is made by Attracta Uí Bhroin in a personal capacity, and on behalf of Irish eNGO - An Claíomh Glas.

Further to the notice on transboundary consultation here:

<https://www.gov.ie/en/consultation/c1eb2-transboundary-environmental-impact-assessment-eia-public-consultation-morgan-and-morecambe-offshore-windfarms-transmission-assets-development-located-in-the-irish-sea/>

on the project here:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032>

By way of opening remarks, we wish to make clear we support the deployment of Offshore Renewable Energy ORE, as part of the urgent need to decarbonise energy systems in the face of the triple-planetary crises, but only if done sustainably. We also respect the UK's sovereign right to determine its own energy mixes, and highlight its obligations under International and National Law in respect of transboundary impacts, and in respect of assimilated EU law in respect of protected sites, habitats and species, and habitats for species, and impact assessments required.

We also welcome a transboundary consultation notwithstanding the extensive concerns set out below in respect of same.

We urge the UK authorities to ensure the Irish public is not disadvantaged in engaging in this environmental decision-making process as a consequence of this, and to ensure their rights under both the Aarhus Convention and the Espoo Convention and the intersection of the two are fully respected and to take all measures necessary to ensure that is the case.

## Issues with the transboundary consultation:

In the first instance we wish to highlight that **the duty ultimately rests with the UK authorities to ensure an effective public consultation with the Irish public** in the context of the UK's obligations under the Aarhus Convention additionally to those obligations on transboundary consultation under the Espoo Convention. The experience of the failures by the UK in respect of the transboundary consultations on Hinkley Point C testify clearly to that and the findings of the Espoo Implementation

Committee, (EIC) and the Aarhus Convention Compliance Committee on that matter, and indeed its wider jurisprudence.

While the Irish authorities sought more time in order to identify the documents most relevant for the Irish public to consider – it has entirely failed to do so. It is clear from the consultation webpages on the GOV.IE website here and also on the Dublin City Council website here - that no such helpful filtering has been provided.

Instead members of the public when they click on the PINS link – have to figure out without any introductory guidance or support on how to navigate it where to find the relevant application documents and figure out exactly what stage the project is at, and try and get to grips with the UK regime. This is not at all conducive to effective public participation as required under Article 6 of the Aarhus Convention and UK legislation transposing and implementing those obligations. It effectively results in a defacto discrimination for the Irish public in breach of Article 3(9) of the Aarhus Convention where we are being discriminated upon in this matter by virtue of our nationality/citizenship and domicile.

Consider how off-putting it is to finally click on “documents” and be presented with this screen image below and an indication of there being 353 documents, many of which will have no bearing on transboundary impacts.

national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032/documents

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Morgan and Morecambe Offshore Wind Farms  
Transmission Assets

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[Examining Authority's note of Unaccompanied Site Inspection \(USI\) - 18 - 20 March 2025 \(PDF, 148KB\)](#)  
From The Planning Inspectorate

9 April 2025	Examination	Unaccompanied Site Inspection (USI)
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[Hearing Notice \(PDF, 7MB\)](#)  
From Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited

4 April 2025	Pre-examination	Hearing Notice
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Additionally, there is the further confusion for members of the Irish public of the project seemingly being in pre-examination phase – with limitations on what the UK public is being asked to do at this phase, whereas it seems there is a full blown consultation running in parallel with the Irish public, and a lack of clarity on whether there will be

further opportunities to engage on transboundary matters as the UK decision-making process advances. With the webpage information on the project stage [here](#) stating

### **“Project stage**

This project is at the **pre-examination** stage.

The preliminary meeting for this project is on: 29 April 2025

You can check the [rule 6 letter](#) to find out how to get involved.

In this meeting, the Examining Authority sets out how they examine the application. This includes the examination timetable and the issues they will focus on during examination.

### [Find out more about getting involved in the preliminary meeting](#)

You may have recently gained an interest in land affected by a development. If the developer did not tell you the application was accepted or you did not register to have your say you can still request to be an interested party.

You need to contact the project team, they will ask the Examining Authority if you can be an interested party and have your say.

Email [morganandmorecambeowfta@planninginspectorate.gov.uk](mailto:morganandmorecambeowfta@planninginspectorate.gov.uk) with your request to become an interested party.”

It is very confusing and off-putting for the Irish public to understand in the context exactly what it is they are being consulted on and if they simply need to register interest so that can be considered in the pre-examination phase or launch into a full scale set of submissions on the proposed project.

To be clear, the UK’s process is itself very well structured, logical and methodical, that is not the issue. I appreciate the obligations to make information available in the State affected at the same time it is made available in the State of Origin. However, the preparatory steps and when a fully fledged transboundary consultation comes face to face with a PINS Pre-examination stage – it is more than confusing.

The issue is the potential confusion that arises in the context of the deficits in information provided to the Irish public in simple clear intelligible terms about what’s going on, what they need to do at this point, why there is a discrepancy in what the UK public is being asked to do at this time, what options they have to make submissions now, or later and any implications of that, and how to go about it all. A simple, clear communication would have sufficed to avoid the compromise that has invariably occurred.

In this regard we submit the transboundary consultation is seriously flawed, and steps need to be taken to remedy this. Invariably many will have been confused and put off by this.

Additionally, I am unaware of any concerted efforts to contact eNGOs in Ireland to ensure they were aware of this. Reliance on the Irish Government's inadequate attempts to publicise it are wholly unacceptable. It is unrealistic to expect the public to trawl the consultation website of the Government everyday in order to identify consultations on activities which may impact them and their environment. Reliance on one off newspaper advertisements is additionally entirely insufficient and ineffective in the context of a society which has largely moved away from buying paper newspapers and for those experiencing financial challenges and unable to penetrate paywalls on online newspapers.

Ultimately, the responsibility lies with the UK on this matter, particularly given the intersection of consultation obligations under the Aarhus Convention with those of the Espoo Convention.

As stated at the outset, the UK authorities are urged to ensure this decision-making process is not compromised so early on, and to ensure all measures are taken to accommodate input at later stages and to make it clear and well publicised how this can be done. This comment and recommendation applies to all jurisdictions where there is a risk of potential impacts.

### **Transboundary screening and States identified where there may be effects.**

The offshore infrastructure detailed in the most recent screening document from January 2025 [here](#) indicates in respect of the first screening undertaken.

- Up to six offshore substation platforms (OSPs).
- Up to five Interconnector cables between the OSPs
- One offshore booster station for the Morgan Offshore Wind Project.
- Offshore export cable corridor containing up to four cables for the Morgan OWP and
- up to two cables for the Morecambe OWF

There is also significant uncertainty on the construction and deployment methods to be used with the screening statement stating:

“The Scoping Report states that multiple foundation types remain under consideration for the OSPs and offshore booster station. These include monopiles, suction buckets, jackets with piling, jacket on suction buckets, tripods and gravity-based

structures.

Multiple methodologies remain under consideration for the installation of offshore export cables. Table 4.5 lists the burial techniques including trenching, jetting, ploughing, mechanical cutting and pre-lay ploughing. The Scoping Report refers to the potential for cable protection, comprising either rock armour or mattresses.”

For the avoidance of doubt, while this preliminary submission indicates concern on specific matters – we reserve our right to raise further issues as the decision-making process proceeds.

In the context of such uncertainty – it was of serious concern that only two States – Ireland and Belgium have been identified as having potential transboundary impacts.

Respectfully, this raises serious concern in respect of the adequacy of the approach taken in respect of the second and more recent screening of Jan 15 2025, following the applicant’s submission of the Development Consent Order DCO documentation to the authorities.

It is difficult to see from the second screening the extent to which these earlier uncertainties have been fully resolved in the submitted application. The text focuses primarily on alteration to the project elements – and doesn’t deal at all with any updates on the technologies etc.

***Particular concerns on the transboundary impact assessment:***

Specific concerns are outlined below including in respect of: screened out impacts; impacts on marine mammals; marine biodiversity; climate change; atmospheric regulation; bird species; protected sites; security risks; fishers; fish stocks, shellfish and benthic species; coastal communities; cumulative impacts; impacts beyond the States identified as potentially affected.\*

***Screened out impacts:***

Even in the context of the two States identified - the following impacts were screened out from transboundary impacts in the first and earlier screening report of Sep 2023 referred to above:

- benthic, subtidal and intertidal ecology;
- seascape, landscape

It is difficult to see how these can be conclusively screened out given the uncertainty on technologies and methods to be used on the project’s marine works quoted above in the screening report. This included uncertainties not limited to the variety of techniques

still open to consideration on creating trenches and burying cables, and the potential sedimentary and tidal and deposition implications which need to be considered in a transboundary context therefore on benthic, subtidal and intertidal ecology, and seascapes.

***Marine Mammals, the multiple cumulative impacts and their implications:***

It is unclear at time of writing if all SAC's in Irish waters have been adequately considered in the screening.

It is also of concern that the section of the screening dealing with marine mammals, focuses on SACs. Whereas marine mammals in Irish waters and indeed UK waters are subject to the strict protection of what is derived from the second pillar of the EU Habitats Directive, and its assimilation into UK law. This means each individual member of the species, together with its breeding and resting places are protected in line with those provisions. In short – it doesn't need to be in an SAC to be protected.

In the context of the highly mobile nature of marine mammal species in particular, the very limited set of States identified for transboundary consultation also seems extraordinary.

It is unclear what migratory, breeding and feeding data was considered in the screening, and how up to date this is.

Cetaceans are highly complex, intelligent and social creatures and the disruptions to their behaviour, and the potential even fatal consequences of anthropogenic noise in marine waters to their ability to navigate and feed, do not appear to have been adequately considered, including in the context of species which move across the seas of so many States.

The implications of seismic surveying, blasting and temporary and permanent displacement of other human activities – and all the implications for noise in the marine environment and the distances that will travel do not appear to have been adequately considered.

Of particular concern is the effect of seismic surveying and sonar activity on cetaceans – a species subject to the strictest protection under what is assimilated EU law – based on the second pillar of the EU Habitats Directive. Seismic noise also kills krill over distances with scientific studies determining only the end point interms of the areas checked. In other words the extent of kill went beyond the distances measured.

There is also the further role that cetaceans play in sequestering carbon and if there sustainability as a species is compromised – we risk compromising this natural and powerful ally in tackling climate change.

Cumulative impact assessment on these species needs to take into account the multiplicity of negative impacts in the marine environment including for example changes in sea temperature impacting on migration, breeding and feeding behaviours, understanding the significance of the more localised impacts associated with the project

The role of a healthy marine environment in helping mitigate against climate change needs to be fully recognised. Too often the idea that renewable offshore energy is perceived as decarbonising our energy systems – is used to blind decision-makers and seeks to ignore the damage such projects can do if not developed properly to the marine environment and thus negatively impact on climate change.

A precautionary approach is warranted in the context.

Additionally of concern is the geopolitical situation. Reliance on cable and energy infrastructure in the marine environment now has to be evaluated as a risk in the context of the geo-political situation. In late 2022, ships from the Russian Federation entered the Irish Exclusive Economic Zone purportedly to do exercises, and occupied an area close to highly sensitive sub-sea cable infrastructure. Even in the last days there was heightened alerts as a Russian intelligence vessel was being monitored by the vastly under-resourced Irish Naval Service, and by the an Irish Air Corps maritime patrol aircraft operating out of Casement Aerodrome in Dublin and RAF surveillance aircraft based in Lossiemouth, Scotland.

In considering cumulative impacts in relation to cetaceans and marine biodiversity generally, and bird species- the following has to be taken into account and doesn't appear to have been done so adequately:

- a) The strategic nature of Irish waters in particular has to be taken into account in respect of cumulative impacts and noise
- b) The extent and attraction of military sonar activity consequent on the strategic nature of Irish waters,
- c) The risks presented by the tactical target nature of energy infrastructure in UK and Irish waters,
- d) The increased tensions generally operating at present precipitating significantly more “noise” in our seas.
- e) The fact that noise travels vast distances under water and doesn't respect national boundaries
- f) The extensive cumulative impacts which need to be considered given seismic and other noise and displacement associated with extensive and pro-longed and future plans for surveying for significant deployments of Offshore renewable energy deployments off the Irish East Coast and South East Coast and future deployments envisaged off the South West and North West and North coast of



the island of Ireland, and the cumulative impacts associated with the future development of that infrastructure, and its operation and decommissioning.

- g) The issue of ORE related noise is of course compounded by noise based surveys for other projects – including even more invasive ones for oil, gas, minerals etc. and the long term historic impacts together with current and future impacts on these highly mobile species needs to be taken into account.
- h) The seriously inadequate approach to regulation on marine noise and its impact on cetaceans by the Irish authorities. Therefore the cumulative impacts the UK may be assuming are likely to be significantly under-estimated.
- i) The significant gaps in data on marine mammals in Irish waters.

### ***Fishers, fish stocks and coastal communities:***

In the context of that big picture – the displacement effect for fishers also has to be revisited, including Irish fishers and Irish fish stocks, and wider fish stocks. There isn't only the issue of physical displacement from these deployments, but there are the further implications on fish stocks. Cetaceans play a well documented and incredibly important role in transferring nutrients from the depths of the sea and oceans when they come to the surface to defecate and urinate. This releases nutrients responsible for phytoplankton blooms and the important cycle this plays in the marine food chain and indeed in oxygen production and carbon absorption is well understood and documented authoritatively. The effect of seismic and other noise based surveying will also impact on krill and marine foodchains. These in turn impact on fish stocks, together with other cumulative impacts – such as sea temperature rise. These all then impact on fishers and the coastal communities which depend on this activity.

Serious concerns arise in respect of the extent to which cumulative consequences of these types of projects really have not been properly considered

### **Bird Species**

The implications of uncertainties highlighted earlier above pertaining to the development technologies and approach to be used for i.a. trenching and covering cables, mean that impacts on sediments etc cannot be predicted safely at this point. There may be further significant impacts to consider in relation to how this impacts on birds feeding areas – including in the inter-tidal regions etc. – not just in Irish sites but also in the UK resulting in differing pressures and movements emerging between the two.

Important to note also is that there have been significant developments in Bird Data available from IWEBs from the National Park and Wildlife Service and Birdlife International and BirdWatch Ireland.

However significant data gaps remain. The interplay especially between UK and Irish bird sites is important, including over-wintering sites, and staging and feeding sites on migratory routes.

It is important that the decision-making process takes into account the relevant data and is aware of the gaps.

There is a duty on the decision-making body to be competent in this regard and not to simply rely on that put in front of it by the applicant. UK Assimilated law in respect of the EIA Directive, on the conduct of an EIA, and the assessments required and the quality of information which needs to be provided.

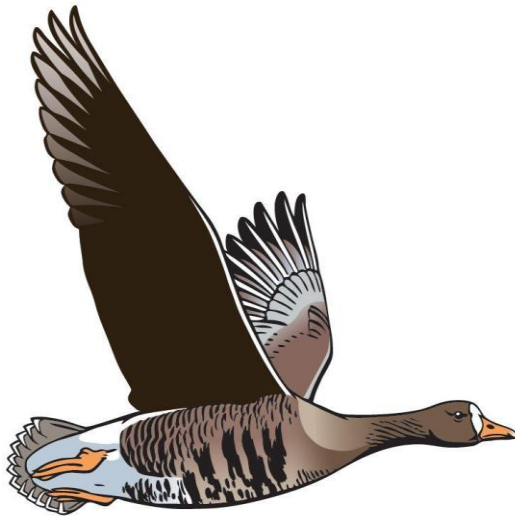
Supplementary information, which is taken into account in the decision also needs to be subject to public consultation – in respect of UK assimilated law based on Article 6(3)(c) of the Environmental Impact Assessment Directive.

## **Conclusion**

Thank-you for your consideration of these remarks which are constructively offered.

I wish to confirm we wish to continue to be consulted throughout this decision-making and do not consider that it would be appropriate to exclude the Irish public from joining and making further submissions over the process of decision-making in the UK.

We also urge to the authorities to engage to ensure there is greater clarity for the Irish public and indeed all States and their public potentially impacted and having an interest in this decision making



# BirdWatchIreland

**birdwatchireland.ie**  
*protecting birds and biodiversity*

**Public Consultation for Transboundary Environmental Impact Assessment (EIA) –  
Morgan and Morecambe Offshore Windfarms Transmission Assets development,  
located in the Irish Sea**

A submission by staff at BirdWatch Ireland

Contact: Rochelle Streker, Marine Spatial Planning Officer,

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**Directors:** [REDACTED]

[REDACTED]  
BirdWatch Ireland is the trading name of the Irish Wildbird Conservancy (Cairde Éanlaith Éireann)

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CHY (Revenue) no. 5703. Registered charity no. 20008963.

Registered office: Unit 20, Block D, Bullford Business Campus, Kilcoole, Co. Wicklow, A63

RW83, Ireland.

## Introduction

BirdWatch Ireland is Ireland's leading charity focused on the conservation of wild birds. Established in 1968, we currently have over 15,000 members and supporters and a local network of over 30 branches nationwide. As an organisation, our conservation team is actively involved in seabird conservation, research, and monitoring. Our policy and advocacy team are active stakeholders contributing to marine conservation at a national and EU level. We are the Irish partner of Birdlife International and are members of the Irish Environmental Network, Stop Climate Chaos, and the Sustainable Water Network, and a founding partner of the Fair Seas coalition.

Our vision is that Ireland should become a world leader in marine conservation and the sustainable management of our marine environment. The protection and restoration of Ireland's biodiversity is vital, and rapid decarbonisation is an essential element of this process. BirdWatch Ireland therefore supports the production of renewable energy and offshore wind to help achieve this. However, offshore renewable energy (ORE) devices and infrastructure must be sensitively located to minimise negative impacts on marine and terrestrial ecosystems, and on seabirds in particular as these may be more impacted than other taxa.

## Ireland's Seabirds

Ireland's marine environment plays host to a huge diversity of ornithological life year-round. In summer, our offshore islands and cliffs host seabird breeding colonies, many of which are of international importance or regional significance. In winter, our coasts and estuaries are of huge importance for wintering waterbirds. Seabirds, as top marine predators exposed to all threats affecting the ocean, are excellent biodiversity indicators, providing us with an insight into the health of, and pressures facing, our marine environment [1].

However, 23 of 24 breeding seabirds in Ireland are either Red or Amber listed Birds of Conservation Concern [2]. They are highly vulnerable, facing current pressures and future threats, including (ranked in order of frequency of occurrence) [3].

- Bycatch and incidental killing (due to fishing and hunting activities) [4]
- Desynchronisation of biological/ecological processes due to climate change
- Decline or extinction of related species (e.g. food source/prey, predator/parasite, symbiote, etc.)
- Other invasive alien species (other than species of Union concern).
- Potential impacts from wind, wave and tidal power, including the associated infrastructure

Even though Ireland has designated a network of Special Protected Areas (SPAs) at coastal sites aimed at protecting the most important areas for breeding seabirds, trends in population

and range for some species are declining [5]. At a European level, of the 24 seabird species regularly breeding in Ireland, nine are declining (Atlantic puffin *Fratercula arctica*, Black-headed gull *Larus ridibundus*, European herring gull *Larus argentatus*, European shag *Gulosus aristotelis*, Fulmar *Fulmarus glacialis*, Great black-backed gull *Larus marinus*, Kittiwake *Rissa tridactyla*, Little tern *Sternula albifrons*, and Mediterranean gull *Larus melanocephalus*) and an additional four have an unknown population trend (Black guillemot *Cepphus grylle*, European storm petrel *Hydrobates pelagicus*, Leach's storm petrel *Hydrobates leucorhous*, and Manx shearwater *Puffinus puffinus*) [6]. Nationally, of these 24 species, two species are declining in Ireland (Atlantic Puffin and Kittiwake) with an additional two species (Arctic tern *Sterna paradisaea* and Common tern *Sterna hirundo*) facing probable declines due to Highly Pathogenic Avian Influenza (HPAI) H5N1 since last census; population trends for a further three species (European Shag, Fulmar, and Great cormorant *Phalacrocorax carbo*) are unknown [5 and Pers Comm Dr. Steve Newton, Senior Seabird Conservation Advisor, BirdWatch Ireland October 8th 2024]. Due to the sensitive nature of these populations, special consideration should be given to the potential effects of offshore developments on these seabird species. In particular, the cumulative effects of multiple developments must be adequately assessed.

For many years BWI has been working to gather data and information on the importance and usage of our marine environment for seabirds and waterbirds. Our work in the Irish Sea includes tagging and tracking of seabirds at key sites, Digital Aerial Survey (DAS) work and observations on the daily movements and flight lines of a range of seabirds. The latter has been part of our annual monitoring and management of key seabird colonies in the Irish Sea for more than 20 years (largely under contract to the National Parks and Wildlife Service (NPWS)). BirdWatch Ireland therefore has a unique understanding of the importance of the Irish Sea for seabirds and the possible impacts of new offshore windfarm developments.

The main impacts of ORE windfarm projects on seabirds and waterbirds include displacement, disturbance, and collision risks. However, there are a range of other possible impacts, including:

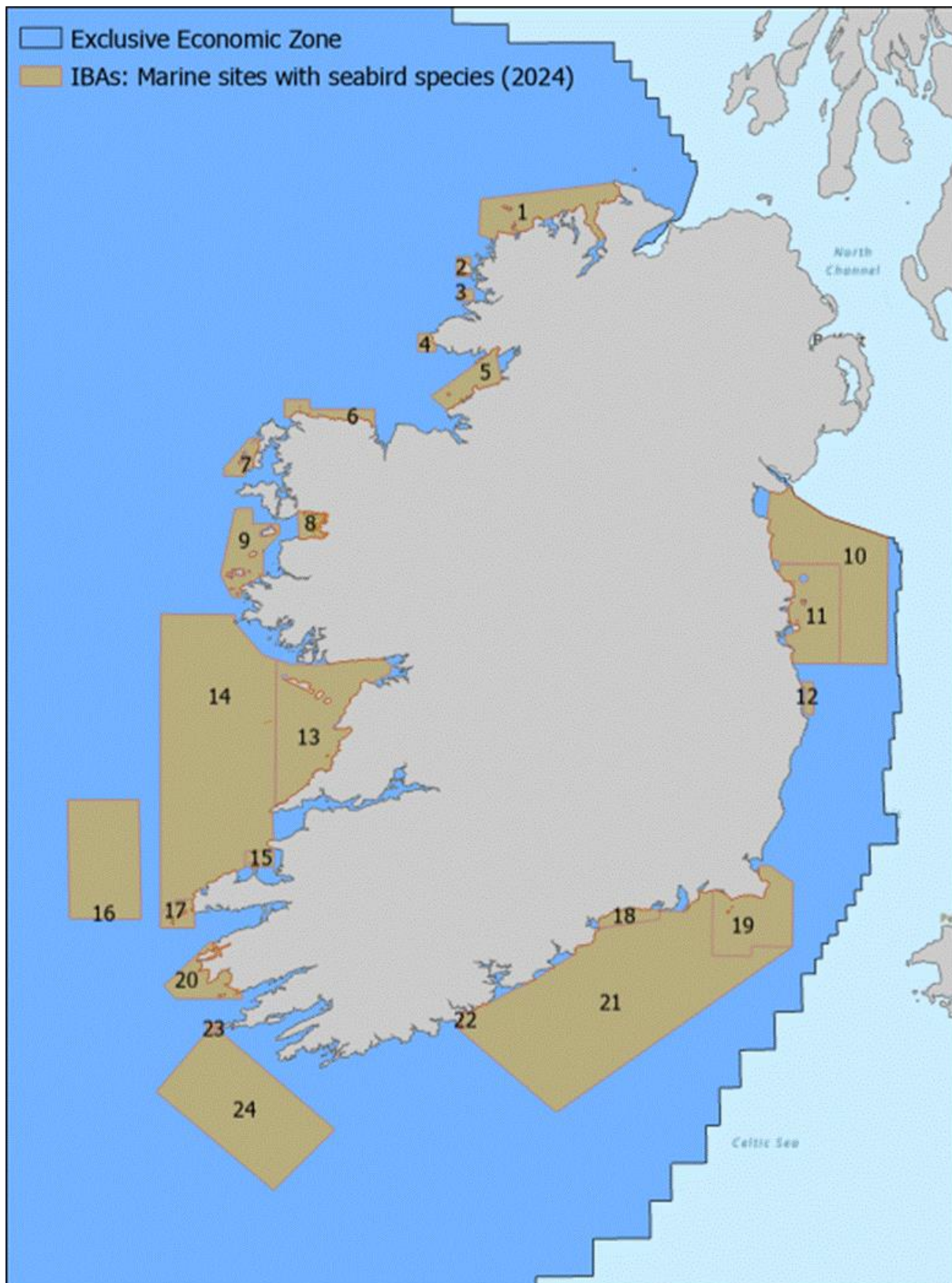
- Barrier effects: wind turbines and structural development can interfere with birds foraging and migration routes, potentially increasing their individual energy expenditure and limiting the available habitat
- Cumulative impacts: how are the cumulative impacts being examined? We are extremely concerned that the cumulative impacts of all current and future ORE projects in the Irish Sea are not being assessed
- Wider ecological impacts on fish stocks/prey base and its impact on fishing effort and location: Knowledge of the impact on the prey base/fish stocks is essential to be able to fully assess the impacts on seabirds. How will fishing efforts be shifted and what is the likely impact of such a shift on seabird foraging opportunities? Particular consideration should be given during construction and post-construction on how the additional disturbance and new structures within the marine environment may change prey location and numbers

- Impacts on non-seabird species, waterbirds and other larger birds using the air space:  
The flight heights are not known for key species and this data has not been collected, as many digital aerial surveys don't collect height data.

## **Transboundary Environmental Impact Assessment (EIA) Public Consultation– Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea**

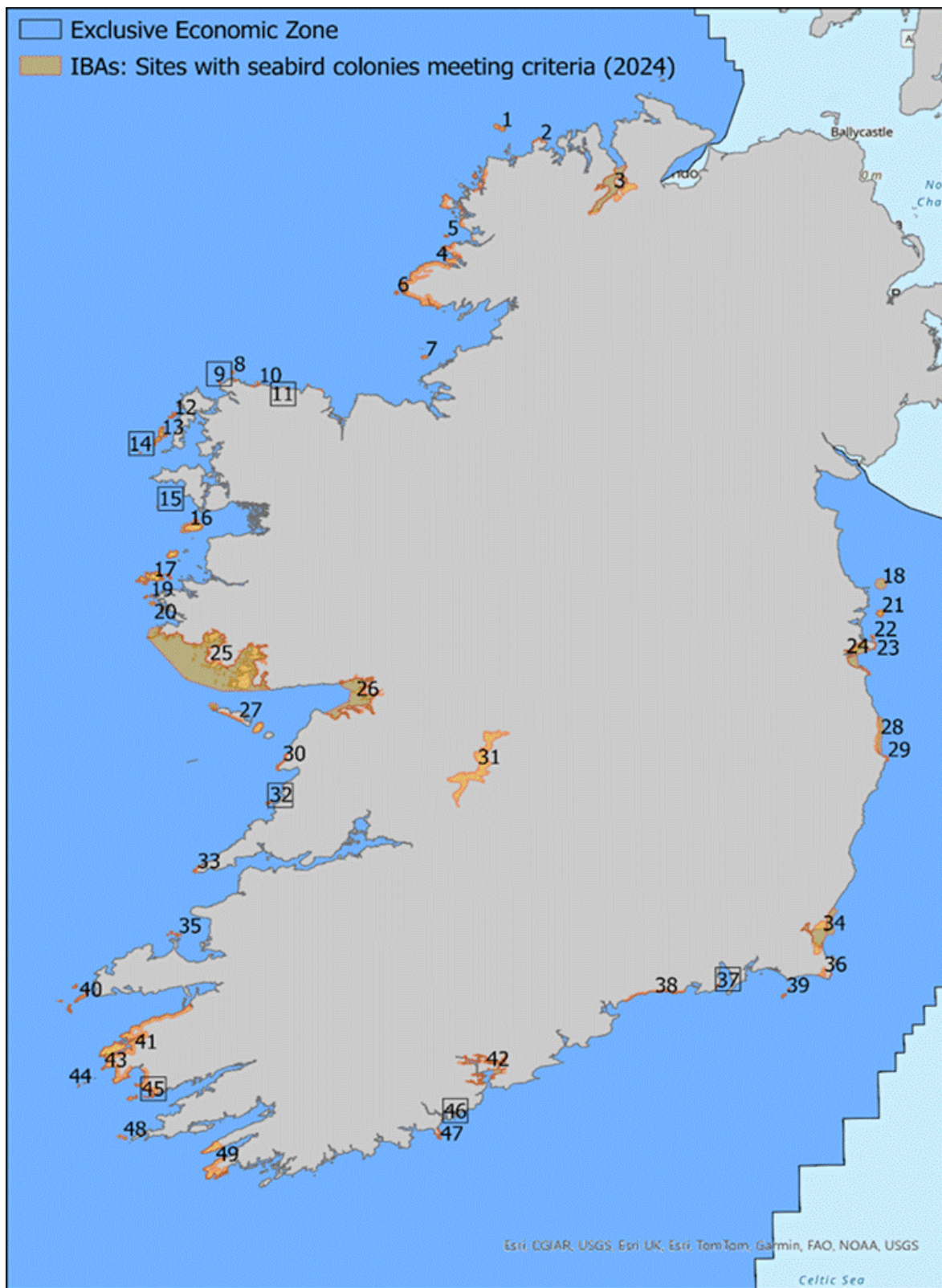
We appreciate the opportunity to comment on potential transboundary effects on Irish seabirds and the integrity of the Irish Natura 2000 network from development outside the territorial waters of Ireland's EEZ. There is no overall marine spatial plan for the Irish Sea, but rather six different plans from different jurisdictions at different stages of implementation. We are unclear if there is coordinated strategic planning about locations of United Kingdom (UK) offshore windfarms and nor are we clear if there have been any discussions with the Irish government on its plans for ORE and the protection of Ireland's marine biodiversity in the Irish Sea. As a whole, the Irish Sea is a unique and interconnected ecosystem and should be managed as such, with the range and habitats of many seabird species crossing multiple borders within it. Ensuring transboundary communication and collaboration as multiple governments look to increase and implement more offshore renewable processes is key to ensuring that the cumulative effects of multiple projects do not negatively impact important marine species, including seabirds, and that the marine plans for one region do not undermine the management or ecosystem health of another.

Many of the seabird species mentioned in the Transboundary Screening report for the Morgan and Morecambe developments are species of special conservation interest that triggered the designation of the many Special Protection Areas (SPAs) within the Republic of Ireland's portion of the Irish Sea. Additionally, we have identified a number of Important Bird and Biodiversity Areas (IBAs), which are of particular importance for the conservation of wild birds and their habitats, near to the proposed developments as well [7]. While IBAs do not afford legal protection to a site, they are identified using a globally agreed standardised set of data-driven criteria and thresholds. In 2024, BirdWatch Ireland, working with BirdLife International, completed the identification of a network of colony and marine IBAs in Ireland's Exclusive Economic Zone (EEZ) [8]. Within these sites, the species identified as qualifying interests occur in regionally or nationally significant numbers [7]. The sites generally also support other important populations (though they may not meet the thresholds for IBA designation), highlighting how these IBAs represent the most important areas for breeding and foraging seabirds in our waters. During this process, 24 marine IBAs and 49 colony IBAs were identified (see Figure 1 and 2 respectively); the shapefiles for these sites can be requested through BirdLife on [REDACTED]



**Figure 1:** Ireland's marine IBA network of 24 sites.





**Figure 2:** Ireland's colony IBA network for 49 sites. Sites with squares around them are newly identified, where sites without were previously identified and have been updated in 2025.



Specific IBAs near to the Morgan and Morecambe offshore windfarm proposed locations and transmission asset development that could be affected by transboundary impacts of the development include 3 marine IBAs and 5 colony IBAs (Table 1).

**Table 1:** The three Irish marine IBAs and five Irish colony IBAs near the proposed Morgan and Morecambe offshore windfarm developments and the transmission asset development, with information on the seabird species present at each IBA, including qualifying interest species used in designating the IBAs and other species also present within these IBAs that did not meet criteria for use in designation [8]

Type of IBA	Name of IBA (Map reference number)	Qualifying Interest Species (meet designation criteria)	Other Species Present
Marine	Northwest Irish Sea (10)	Black-legged kittiwake, Manx shearwater, Northern gannet ( <i>Morus bassana</i> ), Razorbill ( <i>Alca torda</i> ), Waterbirds, Auks (Guillemot and Razorbill)	Arctic tern, Atlantic puffin, Black guillemot, Black-legged kittiwake, Common guillemot ( <i>Uria aalge</i> ), Common gull ( <i>Larus canus</i> ), Common tern, European herring gull, European shag, Great black-backed gull, Great cormorant, Lesser black backed gull ( <i>Larus fuscus</i> ), Manx shearwater, Northern fulmar, Roseate Tern ( <i>Sterna dougallii</i> )
Marine	Dublin Islands and cliffs marine extension (11)	Atlantic puffin, Auks (Guillemot and Razorbill), Black guillemot, Black-legged kittiwake, Common guillemot, Common tern, European herring gull, European shag, Great black-backed gull, Great cormorant, Manx shearwater, Northern gannet, Razorbill, Roseate tern	Arctic tern, Common gull, Lesser black-backed gull, Manx shearwater, Northern fulmar, Black-backed gull
Marine	Wicklow Murrough marine extension (12)	Little tern, Auks (Guillemot and Razorbill)	
Colony	Rockabill (18)	Black guillemot, Black-legged kittiwake, Common tern, Roseate tern	Arctic tern
Colony	Lambay Island (21)	Atlantic puffin, Black-	Black guillemot, Common

		legged kittiwake, Common guillemot, European herring gull, European shag, Great black-backed gull, Great cormorant, Northern gannet, Razorbill	gull, Lesser black-backed gull, Manx shearwater, Northern fulmar
Colony	Ireland's Eye (22)	Atlantic puffin, Black-legged kittiwake, European herring gull, Great black-backed gull, Great cormorant, Razorbill	Common guillemot, European shag, Lesser black-backed gull, Northern fulmar, Northern gannet
Colony	Howth Head (23)	Black-legged kittiwake	Black guillemot, Common guillemot, European herring gull, European shag, Northern fulmar, Razorbill
Colony	Dublin Bay (24)	Common tern	Arctic tern, Black guillemot, European herring gull, Great black-backed gull, Lesser Black-backed gull

Many of the designating species for the nearby Irish IBAs are among the species most likely to be present within the Morgan and Morecambe Transmission Assets development area and were frequently recorded in both windfarm's surveys. Due to the migratory nature of seabirds and the large size of their ranges make it possible that these populations of seabirds intermix and are inter-connected between the countries and could be spending time within the Morgan and Morecambe marine development areas.

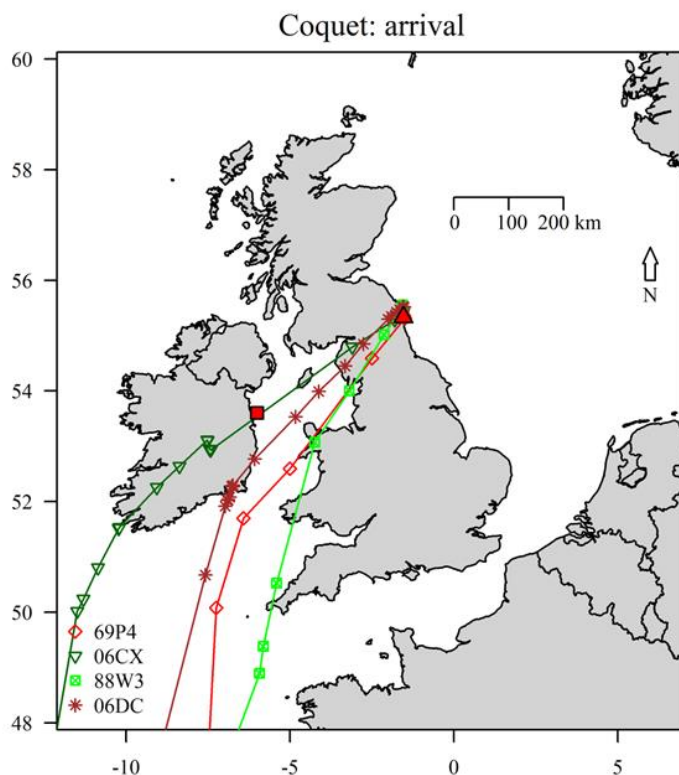
While we understand that the Morgan and Morecambe Transmission Asset development Transboundary reports and screenings found '*no potential for significant transboundary effects with regard to offshore ornithology from the Transmission Assets upon the interests of other states*', we at BirdWatch Ireland have the following concerns, which we believe should be addressed. We stress that these may not be comprehensive, as additional concerns could arise as our knowledge increases and/or seabird populations change over time. We have labeled each concern and offered a brief summary of the concern before more in-depth discussion to aid in navigating through our response.

#### **1. Lack of consideration for multiple tern species and the connectivity between Irish and UK breeding colonies**

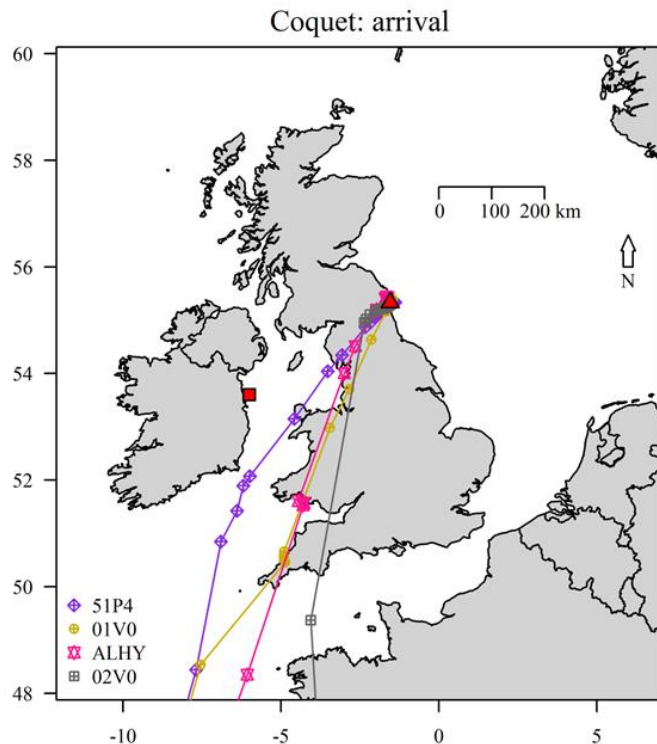
For both Common and Arctic tern, additional assessments within this transboundary EIA were not carried out due to '*species only {being} present in limited numbers, {with} no SPA connectivity*'. Additionally, Roseate terns in Ireland are not assessed in any of the Morgan and

Morecambe Transmission Assets development documentation, despite Rockabill, a nearby Irish SPA and IBA, hosting the largest colony of Roseate terns in Europe. The majority of the North West European population is found at just three colonies: Rockabill SPA (Dublin), Lady's Island Lake SPA (Wexford), both in the Irish Sea, and Coquet Island SPA (Northumberland) in the English North Sea. Together these sites act as a metapopulation; Rockabill is the main source population and the other two are more often sinks (habitats with net population decline), especially when the subpopulations nesting at Coquet and Lady's Island Lake were lower and 'recovering' [9]. This situation may be recurring now given the recent (2022-23) outbreak of HPAI-H5N1 that disproportionately impacted Coquet Island SPA. There is continual inter-connection between the three, with individuals moving between the colonies in the pre- and post- breeding season [10]. Therefore, impacts to the Rockabill SPA and the terns breeding there could have secondary effects on the other colonies Rockabill SPA supports through the export of breeding birds.

Significantly, the movement (autumn/spring migration) of Roseate terns to and from Coquet Island is largely oriented northeast-southwest overland (Northern England) rather than via the sea corridor of the North Sea [10]. The majority of tagged birds are passing through the northeast Irish Sea lying between the Isle of Man, Cumbria and North Wales, with several moving through Morecambe Bay itself where this development will be taking place (see Figures 3 and 4 below). This research clearly illustrates the importance of the Irish Sea for Roseate terns moving between these three colonies.



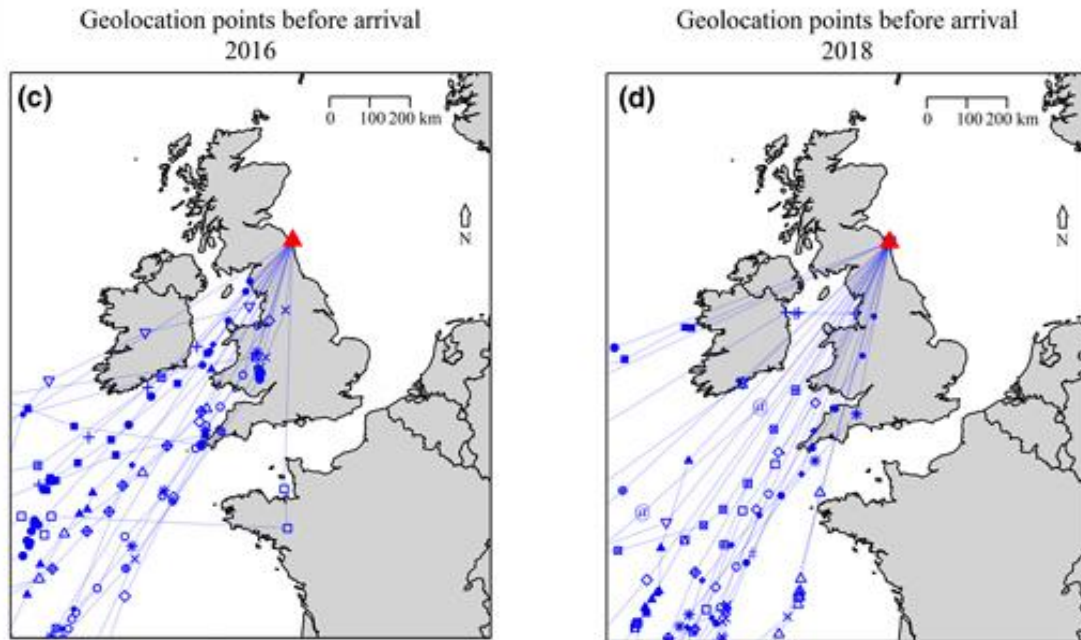
**Figure 3:** Tracking data on the arrival routes of 4 individual Roseate terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration [10].



**Figure 4:** Tracking data on the arrival routes of an additional 4 individual Roseate terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration [10].

We are concerned that this internationally important and rare European Red-listed species was not identified as a species of interest and at risk in the surveys, literature reviews, consultations and environmental assessments of this project. BirdWatch Ireland finds this a significant oversight and would request that the impacts of the Morgan and Morecambe projects and their transmission asset development considers impacts to Roseate Terns and the connections between these important colonies.

Also, we know from geolocator tracking data for Arctic terns that the Irish Sea is an important staging area for birds leaving the UK in autumn (August-September) and arriving in spring (see Figure 5 below) [11].



**Figure 5:** Tracking of the arrival routes of Arctic terns to Coquet Island SPA in 2016 and 2018 that show use of the Irish Sea and Morecambe Bay in migration [11].

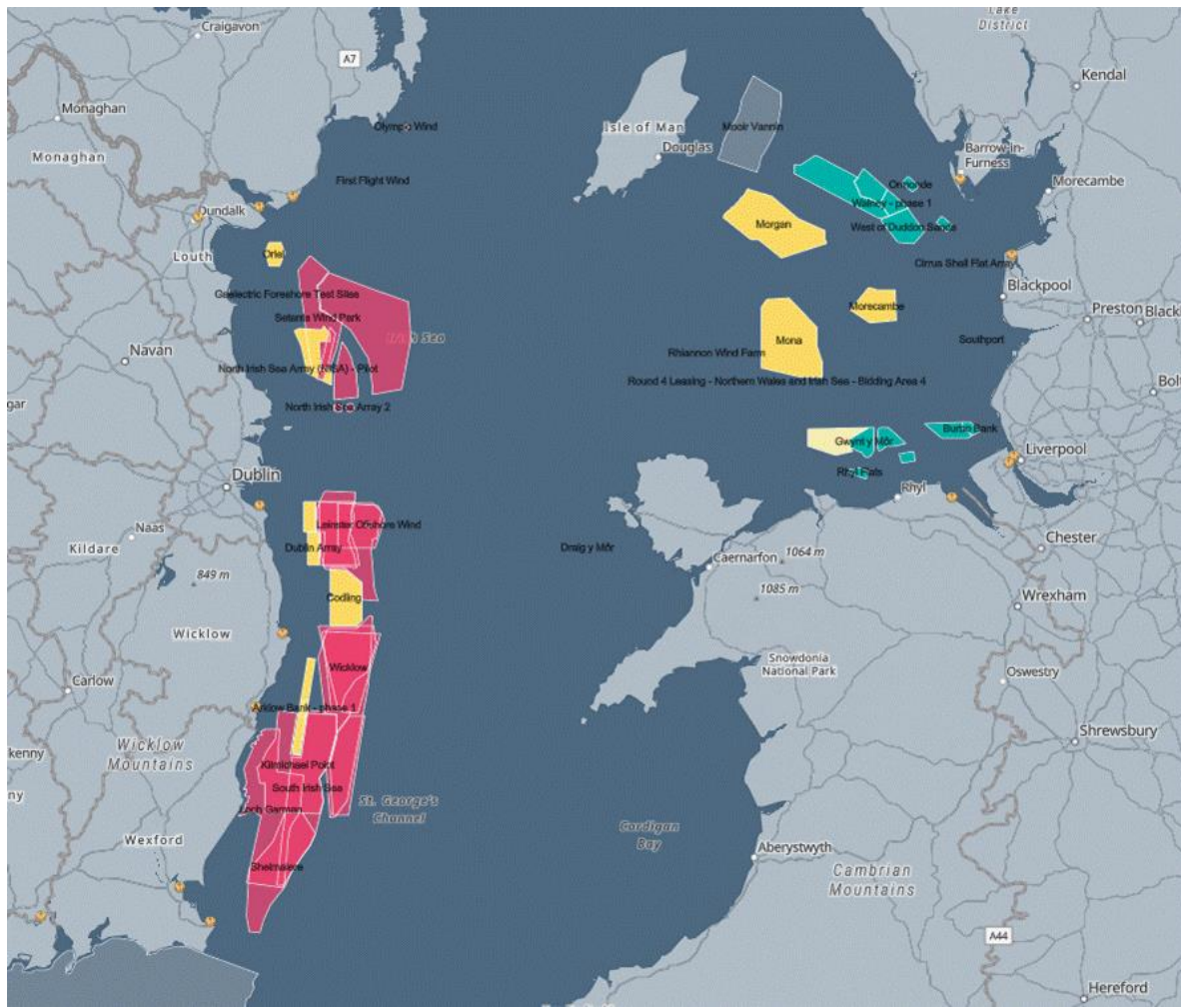
Redfern *et al.* (2020b) refers to overland migration of Arctic terns heading to and from the large Northumberland colonies of the Farne Islands and Coquet Island SPA, where the birds were tagged. As geolocator accuracy may be up to  $\pm 50$  km, these birds may well be using Morecambe Bay coastal waters at some stage. Additionally, terns from elsewhere such as the UK are also recorded in Ireland in the post-breeding season [12]. Birds with UK rings have been frequently recited in Dublin Bay in the autumn months, emphasising the fact that UK terns cross the Irish Sea and stage in Ireland before migration [Pers Comm Brian Burke, Senior Seabird Conservation Advisor, BirdWatch Ireland April 7, 2025]. With several windfarms already operating in this part of the Irish Sea, we would request that further assessment be done for Arctic Terns in the Irish Sea due to their migration patterns which could put them at risk of displacement from offshore energy development including Morgan and Morecambe

## **2. More consideration and assessment needed for Irish offshore windfarm development in cumulative impacts**

Within the cumulative screening matrix for the Morgan and Morecambe Transmission Asset development, all Irish offshore windfarm projects were not screened in for further assessment either due to '*low data confidence*' or '*no conceptual or physical effect-receptor pathway*' for offshore ornithology concerns. While we understand the methods undertaken for this matrix and that each development was assessed individually, this essentially means that no Irish offshore windfarm projects were included in cumulative impact assessments. Given the amount of

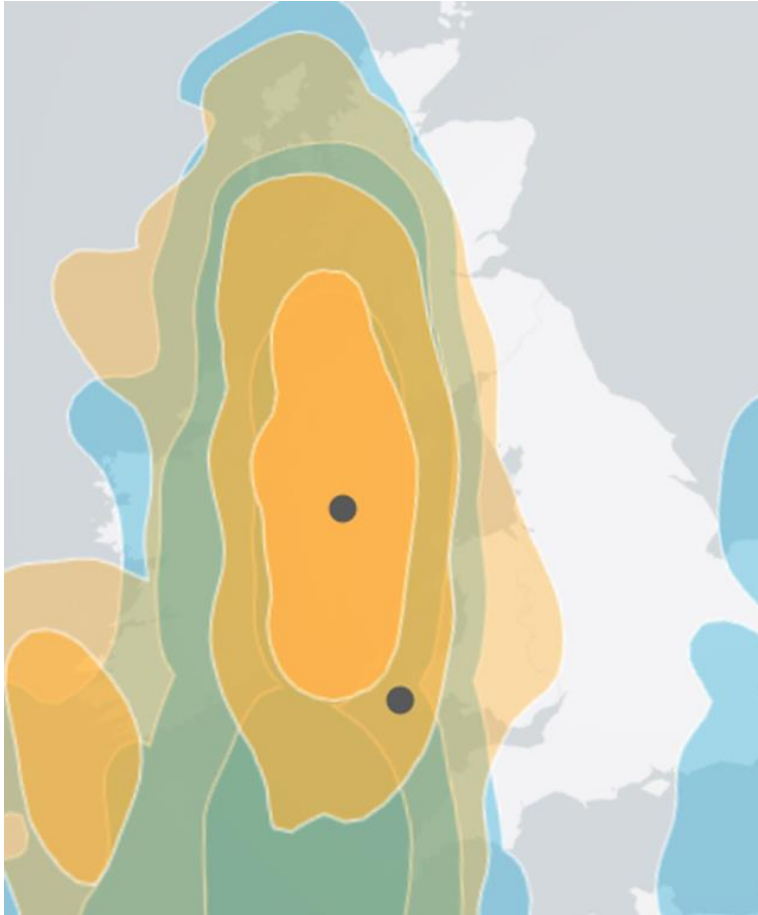


potential offshore windfarms in the relatively small area of the Irish Sea (see Figure 6 below), we believe that this is inappropriate.



**Figure 6:** Map of proposed offshore windfarms within the Irish Sea from both the Republic of Ireland and the UK, as taken from the 4C Offshore website [13]

Birds don't recognize boundaries, and many seabirds utilize breeding sites, foraging areas and migratory routes on both sides of the border. These intermixed and inter-connected seabird populations should be further studied in order to understand how transboundary impacts could affect the overall populations of seabirds utilizing these waters. With increased ORE development in both countries and the associated disturbance and displacement of seabirds, increased development in the Irish Sea could limit movement and migration for seabirds including species of conservation concern. For example, SEATRACK data from Kittiwake colonies in Wales at Skomer and in Ireland at Rockabill show heavy use of the Irish Sea by both colonies throughout the year [14] (Figure 7).



**Figure 7:** SEATRACK data on Kittiwakes from Rockabill (orange; 2018-2022 tracking data) and Skomer (blue; 2006-2010 tracking data) showing the usage of the Irish Sea by the species during all seasons with increasing colour intensity at the 25%, 50%, and 70% probability contours showing general to core use areas [14]

Many such initiatives are already in place, such as the Seabird Monitoring Programme, which has stakeholders from government and NGO sectors across the UK and Republic of Ireland. BirdWatch Ireland works closely with our BirdLife International partner, the Royal Society for the Protection of Birds (RSPB), collaborating on a range of projects. All of the Phase I Irish projects within the Irish Sea have completed and published their Environmental Impact Assessment Reports (EIAR) with An Bord Pleanála, Ireland's national independent planning body [15]. These EIARs are publicly available and can be used in conjunction with the assessments from Morgan and Morecambe to assess potential cumulative impacts from increased offshore development on both sides of the Irish Sea on seabirds. We would request that future cumulative impacts include all proposed wind farm developments within the Irish Sea, including those in the Irish EEZ, in order to have a more comprehensive understanding of the totality of the potential impacts to seabirds utilizing this interconnected marine ecosystem.

### **3. Potential long-term impacts to seabird populations, even after decommissioning**

Within the Transboundary screening report for the Morgan and Morecambe Transmission Assets development, it is stated that '*the effects are likely to be reversible following decommissioning of the offshore infrastructure*'. While we understand that for some immediate and localized impacts, such as disturbance and displacement, this would be accurate, there is still the potential that other impacts, such as mortality, could continue to affect seabirds after decommissioning. Impacts like mortality, which can be caused by displacement or changes in prey (both of which are potential transboundary impacts listed in these reports), can impact seabird populations by decreasing the amount of breeding individuals available. Due to the long lives of seabirds, it can be a long time before impacts to seabird populations can be seen at both the local, national, and international levels. Given the long time it can take for operational impacts to be seen within seabird populations, there is the possibility that effects from operational impacts could continue long after decommissioning and could potentially cause irreversible damage given the declining populations of many of Ireland's seabirds. For this reason, this statement is inaccurate and does not take into account seabird life traits or the potential for long-term effects of operational impacts on seabird populations.

### **Conclusion:**

With an increase in the amount of proposed renewable development in the Irish Sea, from within Ireland and outside Irish borders, transboundary impacts and the cumulative effect these projects may have on birds needs to be better understood and planned for. The migratory nature of seabirds and the large size of their ranges make it possible that the populations of seabirds within the Irish Sea intermix and are inter-connected between the countries; this should be further studied in order to understand how transboundary impacts could affect the overall populations of seabird species utilizing these waters. Given the amount of offshore renewable development planned in the Irish Sea, we at BirdWatch Ireland appreciate that this transboundary consultation was offered and would ask that more comprehensive transboundary assessments are completed before the application goes any further.

In the Irish waters of the Irish Sea, several windfarm developments are being proposed, and along with other offshore wind developments in UK waters including Morgan and Morecambe, there is a very genuine possibility that cumulative effects of all these new wind developments could be a serious threat to seabirds that utilize the marine environment. We fear that assessing each development individually and within a bubble without a cumulative assessment of the totality of all the proposed developments within the Irish Sea risks missing or underestimating impacts to birds and the marine environment and could negatively affect seabirds in the entire Irish Sea marine environment regardless of country boundaries.

From the evidence presented to us in the supporting documents to the application for the Morgan and Morecambe Transmission Assets development, we would ask that further investigation is done to ensure that adverse impacts do not affect the conservation interests of Irish seabirds.



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Comhairle Contae **Lú**  
**Louth** County Council

Louth County Council's submission on the  
Transboundary EIA Public Consultation – 11 April 2025

**Morgan and Morecambe Offshore Windfarms Transmission Assets**  
development, located in the Irish Sea



## Introduction

The purpose of this document is to set out Louth County Council's observations in respect to the Transboundary Environmental Public Consultation Planning Application for proposed Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea.

## Transboundary Environmental Public Consultation Planning Application for Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea.

The Transboundary Environmental Public Consultation was advertised as follows:

In accordance with the provisions of the 1991 United Nations Convention on Environmental Impact Assessment in a Transboundary Context ("the Espoo Convention"), the Minister for Housing, Planning and Local Government received notification from the UK Planning Inspectorate ("PINS") in relation to a development consent application ("the planning application") by Morgan Offshore Wind Limited, Morecambe Offshore Windfarm Ltd.

The Applicants will be seeking consent for two coordinated but electrically separate sets of transmission works. This includes a shared offshore export cable corridor to landfall and a shared onshore export cable corridor to onshore substation(s), and onward connection to the National Grid electricity transmission network at Penwortham, Lancashire.

The proposed development has been identified as a project within the scope of the Espoo Convention as implemented by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") (UK legislation). Consequently, the Secretary of State twice screened the proposal at pre-application stage and on receipt of the planning application. The second transboundary screening process identified potential transboundary issues for Ireland in relation to commercial fishing, marine mammals and shipping and navigation.

### EIA Considerations

#### Assessing Transboundary Effects

It is acknowledged that the Secretary of State undertook two screenings (pre-application stage and planning application stage) to identify if there were likely significant adverse transboundary effects on the environment in other states. On both occasions it was identified that there were transboundary issues for Ireland, with the most recent screening identifying potential issues in relation to commercial fishing, marine mammals and shipping and navigation.

Louth County Council notes the key offshore components of the transmission assets that include:

- Offshore substation platforms (OSPs): Platforms to transform electricity generated by the wind farms to a higher voltage allowing the power to be efficiently transmitted to shore;
- Interconnector cables: Cables to connect the OSPs to each other;
- Morgan offshore booster station: Also known as a mid-point reactive power compensation substation; and
- Offshore export cable corridor.

Louth County Council also notes the findings of the Environmental Statement in respect to marine mammals which concludes that overall, for most impacts there will be no significant cumulative effects from the Transmission Assets alongside other projects/plans, except the potential injury from UXO clearance for harbour porpoise, where a potential significant cumulative effect has been identified if high order detonation is required. It is also noted that detailed a detailed Vessel Traffic Management plan will be developed preconstruction to minimise, as far as reasonably practicable, encounters with marine mammals and basking sharks

Regarding commercial fisheries it is noted from the Environmental Statement that potential effects on commercially important fish and shellfish resources will be restricted to the Offshore Order Limits and surrounding areas. Effects of underwater noise on fish and shellfish receptors, and that commercial fisheries receptors, are not predicted to extend beyond UK and Isle of Man waters and that Transboundary effects on commercial fishing fleets from Ireland, in terms of displacement from the Transmission Assets into alternative grounds, are unlikely, given that activity by these fleets have been observed at relatively low levels across the Offshore Order Limits.



It is also noted that transboundary impacts on shipping and navigation the Transmission Assets during the construction, operation and maintenance, or decommissioning phases.

Whilst the Environmental Statement has concluded that there will be no significant transboundary effects associated with the proposed development, Louth County Council requests that the competent authority ensures that relevant other projects including those within Irish Waters and the cumulative effects of these along with the proposed development are thoroughly assessed when making an assessment of the likelihood of significant effects on marine mammals, commercial fisheries and shipping and navigation.

### **Appropriate Assessment / Habitat Regulations Assessment Considerations**

County Louth contains numerous European Sites which form part of the Natura 2000 network of core breeding and resting sites for rare and threatened species, and some rare natural habitat types which are protected in their own right. Dundalk Bay, Special Protection Area (004026) and Dundalk Special Area of Conservation (000455) are one of the largest of these protected sites and support a significant number and range of protected species and habitats along the east coast of Ireland. The qualifying interests for these sites are available on [www.npws.ie](http://www.npws.ie).

It is noted that the applicants in parallel to the EIA process will undertake a project level Habitat Regulations Assessment (HRA) in relation to the Transmission Assets, including provision of a HRA Screening Report and subsequent Information to Support Appropriate Assessment (AA). Whilst the proposed development is located a significant distance from the County Louth's European sites, any AA should have cognisance of their conservation objectives and a well-documented and reasoned rationale to dispel reasonable scientific doubt regarding potential effects on the integrity of these European sites.

### **Conclusion**

Louth County Council respectfully requests that the above comments are taken into account and trusts that the competent authority will fully assess the transboundary impacts associated with the proposed Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea when making a determination on the planning application.





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**From:** [Q](#)  
**To:** [Morgan and Morecambe OWFTA](#)  
**Subject:** Transboundary Environmental Impact Assessment (EIA) Public Consultation: Morgan and Morecambe Offshore Wind Farms: Transmission Assets development, located in the Irish Sea  
**Date:** 28 February 2025 17:06:41

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Hi

In terms of this project we do not want this in our sea. During wind storms when the blades of the windmills break off they will kill marine life. How will shipping cargo lanes adapt in the future if we have windmills ? Ireland is an island we need the sea to keep free of wind farms.

Also for counterintelligence surveillance and national security an adversary from within or external might target thi wind farm.

Please use the time and resources on better projects