



## BirdWatchIreland

protecting birds and biodiversity

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**Re: Application reference number: FS006566 (Foreshore Lease application for the testing of prototype wind, wave and tidal energy devices)**

September 9<sup>th</sup> 2016

Dear Marine Planning and Foreshore Section:

BirdWatch Ireland is supportive of the development of renewable energy technologies in Ireland to reduce our reliance on fossil fuels and to reduce greenhouse gas emissions in order to avert climate change. We also welcome the opportunity to comment on this foreshore license application for the renewable energy test site in Galway Bay. The following are the comments of BirdWatch Ireland in relation to this application:

1. BirdWatch Ireland is concerned that the project proposal is for various new and developing technologies to be tested on site but there is insufficient and inconclusive information provided in the application about these technologies and their duration and magnitude of use over a 35-year period. Since there is inadequate information, it is not possible to fully and accurately assess the impacts on flora and fauna for individual pieces of technology, cumulatively or in combination with other technologies or projects. It is also not possible in our view to screen out this project for full Appropriate Assessment (AA).
2. In addition, there is insufficient information provided on bird species which use the area around the test site. **BirdWatch Ireland recommends that ornithological survey work is conducted to determine bird species, their abundance and behaviour in and around the test site using appropriate methodologies.** This is required to more accurately define the potential impacts of the proposed technologies on birds and any necessary mitigation measures. IWeBs data is provided in the application but this data relates to the shoreline and but the application is for a project which is 1.5km offshore.
3. It is important to note that while the proposed test site is not in a SPA, it is within 15km of several Special Protection Areas (SPAs) for birds including the the Inner Galway SPA and Lough Corrib SPA which contain qualifying interests which may forage in the area of the test site (as specified by the AA screening report provided). In addition, Article 4 (4) of the Birds Directive calls for the protection of birds outside of these sites: *In respect of the protection areas referred to in paragraphs 1 and 2, Member States shall take appropriate steps to avoid pollution or deterioration of habitats or any disturbances affecting the birds, in so far as these would be significant having regard to the objectives of this Article. Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats.* All efforts must be undertaken to ensure that there are no significant impacts on birds in the area.
4. BirdWatch Ireland is concerned with the potential impacts of disturbance on birds that use the marine environment including from increased boat traffic to and from the test site. Insufficient detail is provided on



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boat traffic in the deployment and operational phases of the different technologies and over the time scale envisaged. More information on the number of journeys and types of boats to be used and when they will be used is required.

5. In addition, we have concerns about the disturbance and collision risk for seabirds specifically in relation to the proposed Rotational Tidal Turbines: Horizontal and Vertical Axis Submerged turbines which may be a potential problem for diving seabirds and those that feed just below the sea surface and in relation to Tetra Float platforms which accommodate Turbines – how many wind turbines will be deployed? There may be more impacts from other technologies which may be used in the future but not specified in the report at this stage.
6. BirdWatch Ireland is also very concerned that there is **no assessment** of the potential **cumulative** and **incombination effects** of this project and the potential impacts of the proposed Galway Harbour extension, a decision on which has yet to be made by An Bord Pleanála. Birdwatch Ireland is concerned with **the impact of disturbance on seabird species** of both projects and in combination with other potential projects in Galway Bay. According to the Statement of Appropriate Assessment by An Bord Pleanála in relation to the Galway Harbour Extension and Thomson Unicomarine ecology report prepared for An Bord Pleanála<sup>1</sup>, there is likely to be a moderate adverse impact on some of the qualifying interests of the Inner Galway Bay SPA. The latter report states that “The proposed development will lead to a significant increase in shipping traffic, which has been estimated to be 25% for commercial shipping and 600% for recreational vessels”. It goes on to say that “Based on the precautionary principle, and considering the potentially significant increase of maritime traffic and the sensitivities of the different bird species, it is likely that the impact of disturbance on marine birds is likely to be moderate adverse and may not be ecologically significant” (pg 32).
7. In the Environmental Report, the Flora and Fauna Worst case scenario table 6.4 of the Environmental Report does not make any sense as the actual impacts are not specified. In addition, Table 6.9 purports to show the impact matrix for different activities but no activities are listed. This table is not clear and does not provide sufficient information to make a determination on impacts.
8. BirdWatch Ireland is concerned with the potential that project splitting has occurred in relation to this project and the approval of the previous foreshore license for the laying of cables and now with the current proposal to increase the scale of the test site to include a substantial increase in the number and types of renewable energy technologies over a 35-year life span.

BirdWatch Ireland is of the view that there is insufficient information presented on the impacts on bird species of the test site project alone or in combination with other projects within Galway Bay. Further information should be provided as outlined above before any decision is made to ensure no impacts on seabirds in particular. In addition, there must be consideration of the impacts of the several proposed marine-based projects in Galway Bay and overall impacts on the conservation of seabird populations which are the qualifying interests in adjacent SPAs.

Galway Bay would benefit from having an overarching strategy which would outline a vision and direction for the Bay, its people and its immense wealth of biodiversity underpinning it. This type of strategy could identify areas of opportunity for development or areas which are sensitive to development. A plan along the lines of the

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<sup>1</sup> Thomson Unicomarine (2015) Galway Harbour Extension Project: Assessment of Ecological Impacts on the Marine Environment for An Bord Pleanála.



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Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary and associated planning tools such as Strategic Environmental Assessment and AA could help in this regard. Also, management plans for the Special Protection Areas for birds and the Special Areas of Conservation in the vicinity of Galway city (or anywhere in Ireland) would help to determine the actions required and caution needed to ensure Favourable Conservation Status for habitats and animals is reached and/or maintained and Favourable Reference Values for birds is established and give direction to project proposers.

Yours sincerely,

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