

An
Bord
Pleanála

Record of Meeting ABP-317409-23 1st Meeting

Case Reference / Description	ABP-317409-23 - Proposed development of an offshore wind farm and associated infrastructure for Sceirde Rocks located between 5km and 11.5km off the coast of Connemara, Co. Galway		
Case Type	Marine pre-application consultation under Section 287		
1st / 2nd / 3rd Meeting	1 st		
Date	19/09/2023	Start Time	14:00pm
Location	Office of An Bord Pleanála	End Time	16:35pm

Representing An Bord Pleanála

Stephen Kay, Assistant Director of Planning (Chair)

Una O'Neill, Senior Planning Inspector

Maeve Flynn, Ecologist

Eugene Nixon, Consultant

Cora Cunningham, Senior Executive Officer

Evan McGuigan, Executive Officer

Representing the Prospective Applicant

Colm Ryan, MKO

Órla Murphy, MKO

Kieran O'Malley, Corio

Tim Coffey, Corio

Ewan Edwards, Xodus
John Willoughby, MKO (online)
Ronan Dunne, MKO (online)
Michael Watson, MKO (online)
Sean Creedon, MKO (online)
Robert Kennedy, MKO (online)
Richard Barker, Macroworks (online)

Introduction

The meeting commenced at 14:00pm.

The Board referred to the letter received from the prospective applicant requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters it wished to receive advice on from the Board.

The purpose of the meeting is also to give the Board an opportunity to provide its opinion on issues relating to the making of an application and other matters including the National Marine Planning Framework (NMPF), objectives of maritime spatial planning, the principles of proper planning and sustainable development and the environment and any European Site that might be of relevance to the Board in making a decision on an application.

The prospective applicant was advised that the Board will not discuss or provide advice on the merits or otherwise of specific aspects of the proposed development. The Board wishes to ensure that the application presented to the Board will be as comprehensive as possible.

The Board mentioned general procedures in relation to the pre-application consultation process as follows:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- A further meeting or meetings may be held in respect of the proposed development.
- The Board envisages that the pre-application consultation process under section 287 of the Act will not involve a significant number of further meetings. Following the conclusion of this meeting, the Board will be in contact regarding a suggested schedule and agenda for future meetings.
- In the event that the prospective applicant has submitted an application for an opinion under section 287A of the Act (Design Options) this discussion will be held at a later date, either in conjunction with discussion under s.287 or as part of a separate meeting. This will be advised to you after this meeting. The prospective applicant should note that a separate Board opinion will issue in respect of section 287A of the Act and that records relating to this application will not be available for public inspection until an application for permission is made to the Board.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- In accordance with section 287(3) of the Act, the decision to close a consultation rests with the Board. At the conclusion of the pre-application process the case file including the record of meetings held and the report of the reporting inspector detailing the issues arising in the consultation, will be forwarded to the Board. The Board will issue a direction / Order clarifying that the consultation has closed and that the prospective applicant may make an application for permission under section 291.

- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

Presentation by the prospective applicant:

The prospective applicant began its presentation with an introduction to its project team and an overview of the timeline of the proposed development. It stated that the project team was partially established in 2002 and outlined several milestones in the project for the proposed development, including the granting of a Foreshore Lease in 2008, the granting of Maritime Area Consent (MAC) in 2022, the granting of a grid connection assessment from EirGrid in 2022, and the project's success in the Offshore Renewable Electricity Support Scheme (ORESS) auction in 2023. It also outlined its future targets for the project, including the submission of a planning application to the Board in the first quarter of 2024, the commencement of construction of the proposed development by 2026, and the proposed development being operational by 2030.

The prospective applicant provided some background information on the project, stating that it originally applied for the Foreshore Lease in 2008 for the purpose of constructing an offshore windfarm at Sceirde Rocks, off the coast of Co. Galway. It submitted that the project has evolved since 2008 – largely due to the new technology that has developed in the time since regarding turbines – and that the current array area boundary that it intends to use for the proposed development remains the same as the lease area in 2008, and in line with the MAC.

A description of the proposed development was provided by the prospective applicant. The offshore element of the proposed development would consist of an offshore wind farm located at Sceirde Rocks – between 5km and 11.5km off the coast of Connemara, Co. Galway – an offshore 220kV substation, inter-array cables and an export cable. The onshore element of the proposed development would consist of landfall infrastructure for the export cable which is proposed to landfall near Doonbeg in County Clare, an onshore 220kV substation and connection to the national grid at Moneypoint, Co. Clare.

The prospective applicant stated that the proposed development is located off Connemara's Gaeltacht coastline and that the preservation of the Irish language is a major priority for the project. It submitted that the proposed development would contribute to the Gaeltacht region through the provision of job opportunities, local economic development, and community infrastructure, as well as through supporting Irish language plan schemes. It stated that the project team includes a stakeholder and community manager, who is a local based native Irish speaker, and that local engagement regarding the proposed development was currently ongoing.

The prospective applicant provided an overview of the various policies connected to the proposed development. It referenced policy enacted at EU, national, regional and local level – including the EU Offshore Renewable Energy Strategy, the National Marine Planning Framework (NMPF), the Climate Action Plan, and others. It also referenced the development plans for Galway County Council and Clare County Council, and stated that it had engaged with both planning authorities regarding the proposed development.

A legislative overview was provided by the prospective applicant regarding the proposed development. It referenced legislation enacted at international, EU and national level and stated that it is tracking the progress of the Historic and Archaeological Heritage Bill and also the Planning and Development Bill for any potential impacts they may have on the proposed development. The prospective applicant acknowledged the possible disapplication of section 182A (of the Planning and Development Act) in the Historic and Archaeological Heritage Bill and stated that its preference would be for the offshore and onshore elements of the proposed development to be included in one application.

Regarding site location and selection, the prospective applicant stated that the closest settlement to the windfarm – Carna village – is located approximately 5km away. It submitted that the site had been selected due to its favourable characteristics for offshore wind development and that a location closer to the shore was considered more efficient than locations further from the shore. It further submitted that the selected site would avoid environmentally sensitive areas such as Special Areas of Conservation (SACs), Natural Heritage Areas (NHAs) and Special Protection Areas (SPAs).

Regarding turbine layout for the proposed development, the prospective applicant stated that a number of different turbine layouts are currently under consideration. It submitted that the maximum number of turbines that would be used would be 26 and that the proposed development would have a generating capacity of up to 450MW. The turbine parameters would be assessed to include a tip height of up to 325m, a hub height of up to 185m, and a rotor diameter of up to 290m. It was stated that due to its geographical location it would be generating electricity at different times of the day to that of the windfarms on the east coast. The prospective applicant stated that gravity based foundations would be the most likely foundation type to be used for the turbines.

Regarding the grid connection route, the prospective applicant stated that a grid connection cable of approximately 70km would be buried under the seabed. This grid connection cable would extend from the offshore windfarm, make landfall northwest of Doonbeg, Co. Clare, and run underground predominantly along the road network. A 220kV substation would be built as part of the proposed development, and the cable would connect to the national grid at Moneypoint, Co. Clare.

The prospective applicant presented a list of the licences and consents that it had acquired for the proposed development. It reiterated that it was granted MAC, the grid connection assessment from EirGrid and the Foreshore Lease and stated that it had been granted two further Foreshore licences for site investigations in September 2023 – FS007161 (regarding the array site) and FS007543 (regarding the export cable corridor).

The prospective applicant submitted that work had been undertaken on various site surveys and investigations regarding the proposed development. In terms of onshore surveys and investigations, it stated that noise and geotechnical surveys had been completed and that work on a number of other surveys (including topographic, hydrological, transport, and others) were still ongoing. In terms of offshore surveys and investigations, it stated that geophysical, bird and mammal, and maritime traffic surveys had been completed and that work on a number of other surveys (including fishing, geotechnical, benthic, and others) was still ongoing.

The prospective applicant stated that the proposed development had undergone a constraints and facilitators-led design process and that some of the key topics that would be assessed and taken into consideration would be landscape and visual amenity, marine mammals and birds, designated sites and habitats, and offshore engineering design and construction methodology.

Regarding landscape and visual amenity, the prospective applicant stated that it would be using a 40km radius study area. It stated that it would include 31 viewpoints for photomontages which would represent a range of coastal, island and inland receptors. The prospective applicant stated that most of these viewpoints had been captured already and presented four examples of varying nature and locations.

Regarding marine mammals and birds, the prospective applicant stated that it had undertaken relevant aerial surveys for the last two years and had completed them earlier this month (September 2023). These surveys covered two breeding and two non-breeding seasons. The prospective applicant stated that the investigation site for these surveys included two buffer zones of a 4km and 10km radius respectively. It submitted that the site of the proposed development does not appear to be an appropriate feeding ground for marine mammals or birds and that the installation method for the gravity based foundations of the proposed turbines would result in reduced noise impacts for nearby species.

Regarding designated sites and habitats, the prospective applicant stated that the two SACs nearest to the proposed development are the Kilkieran Bay and Islands SAC and Inishmore Island SAC. It also referenced the proximity of the proposed development with the Slyne Head to Ardmore Point Islands SPA and the Carna Heath and Bog NHA. It stated that it was also tracking proposed NHAs and that birds in these areas would be considered in surveys.

Regarding construction and design, the prospective applicant stated that it anticipates construction of the offshore elements of the proposed development to take approximately 3 to 4 years from 2026. It stated that during construction, activities will take place within the site, wet storage areas (particularly regarding the gravity based foundations) and port facility. Shannon Foynes Port and Port of Cork are currently being considered by the prospective applicant as a suitable location for the marshalling of turbines during construction. It submitted that Ros an Mhíl is being

considered as a suitable location for an Operation and Maintenance (O&M) facility. An overview of construction for onshore and offshore elements of the proposed development was provided by the prospective applicant, who also stated that post-construction surveys would be undertaken.

The prospective applicant described in further detail the gravity based foundations that it intends to use for the turbines in the proposed development. It provided the reasons as to why this foundation type is its preferred option, citing short installation times, structural strength, materials involved in construction, and seabed conditions on site. It stated that the foundations would be manufactured elsewhere (potentially in Ireland or abroad) and transported to an appropriate wet storage area on a heavy lift vessel. It said that it is currently in discussions with ports that have potentially suitable wet storage areas. It also provided further information regarding the installation process for the gravity based foundations.

The prospective applicant provided an overview of how its Environmental Impact Assessment Report (EIAR) would be structured. Volumes 1 to 4 would consist of the main EIAR, including the non-technical summary, general chapters, offshore chapters, and onshore chapters. Volume 5 would comprise of the photomontages and Volumes 6 and 7 would include the EIAR appendices.

The prospective applicant stated that public consultations had been held regarding the proposed development through public and stakeholder meetings, door to door leaflet drops, media interviews, a live website, a virtual exhibition room and the appointment of a community liaison officer. It described engagements held with Galway County Council and Clare County Council regarding the proposed development as positive and stated that a community benefit fund would be included in the project.

The prospective applicant stated that it intends to continue preparations of the final design, EIAR, planning documentation, pre-planning consultations and public consultations, and reiterated its intention to submit a planning application for the proposed development in the first quarter of 2024.

Discussion:

The following matters were discussed:

- The prospective applicant stated, following a query from the Board's representatives, that its preference is to submit one planning application for the proposed development and that it has engaged with the Department regarding the Historic and Archaeological Heritage Bill.
- Following a query from the Board's representatives, the prospective applicant stated that the proposed O&M facility would probably not be a part of any future application for the proposed development and that discussions regarding it were continuing.
- The Board's representatives stated in relation to a query regarding viewpoints for photomontages that the prospective applicant should consult further with the planning authority/authorities when choosing which viewpoints to consider. Viewpoints from nearby islands – including the Aran Islands – were recommended.
- The Board's representatives advised that a visual impact assessment is important, as is the cultural heritage of this area, noting the development plan analysis of the landscape sensitivity along the coast and the 'iconic' status of the Aran Islands. The Board's representatives advised the prospective applicant to take into account guidance documents from the United Nations Educational, Scientific and Cultural Organization (UNESCO), given a part of the Aran Islands is on the tentative list of world heritage sites and to also consider in its visual assessment the Seascape Character Assessment for Ireland 2020.
- The Board's representatives advised the prospective applicant to take the view of Galway County Council into account regarding the 40km radius study area for landscape and visual amenity studies and whether this would need to be increased to a 60km radius (as per the latest Nature Scot guidance recommendations), including a rationale if the lower distance is opted for. The prospective applicant stated that it would not be a major issue if the zone of influence needs to extend to the 60km radius.

- The Board's representatives advised the prospective applicant to ensure that a robust assessment is undertaken regarding socio-economic, tourism and landscape impacts in relation to the proposed development.
- The Board's representatives advised the prospective applicant to fully consider birds, marine mammals, SPAs and SACs along/in proximity to the proposed undersea export cable and grid connection, as well as in proximity to the site of the proposed turbines.
- Following a query from the Board's representatives, the prospective applicant stated that it does not currently intend to carry out further studies regarding marine mammals and birds apart from the aerial studies completed and that it would be including data from seal tracking and the ObSERVE Programme in its reports. It also stated that benthic studies would be carried out imminently following the granting of a licence.
- The Board's representatives, while acknowledging that benthic studies may provide more data on mammals, queried whether aerial surveys would be considered sufficient in terms of best practice and advised the prospective applicant to consider other approaches regarding data and a rationale where certain data collection methods are not utilised. Any application should consider issues of collision risk/underwater noise and disturbance for mammals, as well as issues relating to birds, such as proximity to feeding sites, foraging distances from breeding sites, migration routes, habitat loss, collision risk, barriers to migration routes, noise & disturbance.
- The Board queried whether there was any data gathered in relation to the use of Sceirde Rocks themselves by birds and sea mammals.
- Applicant advised they had no specific information to hand in relation to Sceirde Rocks. The prospective applicant acknowledged that it would take data regarding feeding, foraging bird flight heights and migration routes into consideration.
- The Board's representatives advised the prospective applicant that if there is something in their methodology that was not studied to explain very clearly why not and to elaborate on any data gaps.

- The Board's representatives advised the prospective applicant to be aware of time sensitivity regarding any data it uses and ensure that the most up-to-date data is utilised.
- Following a query from the Board's representatives, the prospective applicant stated that it had not yet engaged with the National Parks and Wildlife Service (NPWS) regarding the proposed development and that it is hoping to consult with them soon.
- The Board's representatives asked the prospective applicant about the undersea export cable and its impact on the area. The prospective applicant said that benthic studies would be carried out on the area and that no significant issues had yet been identified in this regard.
- The Board's representatives advised the prospective applicant to consult with any commercial fisheries in the area regarding the proposed development. The prospective applicant submitted that there are a lot of small fisheries in the area that are primarily engaged in potting. It also submitted that the undersea export cable route is on the periphery of prawn-fishing grounds and that it is taking this into consideration.
- The Board's representatives advised the prospective applicant to ensure that its geophysical surveys elaborate fully on the impact on the seabed. It also advised that any work undertaken regarding sediment movement and future impact be robust.
- The Board's representatives advised the prospective applicant to engage with the Environmental Protection Agency (EPA) regarding the potential requirement for a Dumping at Sea licence. The prospective applicant stated that it is currently considering this issue. It was noted that reference to any dumping at sea licence should be included in the public notice. The Board's representatives recommended potential licencing requirements be taken into consideration.
- The Board's representatives advised the prospective applicant to consider whether any aspect of the project come within the scope of the Control of Major Accident Hazards regulations.
- The Board's representatives highlighted the fact that there are 92 policies contained within the NMPF and it would be optimal for the prospective applicant to systematically assess the application on the basis of each of these policies

and to use the best available data and science in the assessment. The Board advised that this information needs to be clearly addressed within any proposed application, to ensure a thorough and robust application is submitted. The prospective applicant stated that it would provide a Statement of Consistency against each of the policies.

- The Board's representatives advised the applicant to be clear in terms of the data utilised in its assessment of the NMPF policies and to present this information clearly within the proposed application.
- The Board's representatives advised the prospective applicant to fully explain its rationale regarding site selection for the proposed development – including alternatives considered, environmental considerations, characteristics of this environment, reasons for a preferred layout, and any differences between a grid and sporadic layout.
- The Board's representatives advised the prospective applicant to provide as much information as possible regarding the context and evolution of the proposed development.
- The Board's representatives queried what options were being considered at the landfall site in Clare and if designated sites on either side of the proposed landfall area were being taken into account. In response, the applicant stated that horizontal directional drilling through the 15m high cliff edge was being considered, which would avoid a designated site at the beach at Doonbeg.
- The Board's representatives advised the prospective applicant to ensure that its archaeology and land based surveys are as robust as possible.
- The Board's representatives also noted that an archaeological walkover survey may not be sufficient and advised the prospective applicant to consult fully with the Department in this regard.
- The Board's representatives recommended Transport Infrastructure Ireland (TII) as a relevant body to contact regarding the onshore element of the proposed development, as well as the relevant local authority roads departments.
- The Board's representatives advised the prospective applicant to engage with the relevant planning authorities prior to lodging an application.

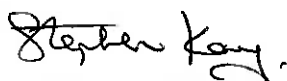
- The Board's representatives advised the prospective applicant to address tourism, cultural and heritage issues during public consultations regarding the proposed development.
- The Board's representatives advised the prospective applicant to identify the main coastal planning authorities for the proposed development, as well as others who may be identified as prescribed bodies. The prospective applicant stated their opinion that Galway and Clare would be the two main planning authorities and that no others would be impacted by the proposed development.
- A discussion was held regarding the gravity based foundations. The prospective applicant stated, in response to queries from the Board's representatives, that some inert imported material would be used on the seabed during the installation process while some material may be removed to ensure a flat surface for installation. The results of benthic studies would provide further data regarding the impact of installation on the seabed and sediment.
- The Board's representatives requested that the prospective applicant provide a list of all the consultants mentioned at the meeting who are involved in the EIAR.
- In response to a query from the Board's representatives, the prospective applicant submitted that public feedback regarding the proposed development had been largely positive and that it had been engaging with a group of fishermen who had expressed concerns over the impact of the proposed development on fishing in the area.
- The prospective applicant asked a question regarding the closure process for consultations under section 287. The Board's representatives stated that the consultations would be closed once the Board feels that it has nothing further to add and that the prospective applicant would be notified in advance of the closure process.
- The Board's representatives advised the prospective applicant that it would be required to provide both English and Irish versions of the site notice for the proposed development.

- A general discussion was held regarding the prospective applicant's intention to submit a request for a section 287A meeting for the proposed development. The prospective applicant acknowledged the contents of the recently issued circular from the Department regarding section 287A. The Board's representatives stated that section 287A provides for one meeting regarding design flexibility and advised the prospective applicant to ensure that it has determined exactly what elements of the proposed development it wishes to discuss regarding this prior to any potential meeting. The prospective applicant stated that it would take this into consideration in drafting their request under s.287A.
- The Board's representatives stated that the prospective applicant may wish to consult further with the planning authorities and conduct further surveys before requesting a second meeting. The prospective applicant said that it would continue work on finalising their survey work and consultations in advance of a further meeting.
- The prospective applicants inquired as to the likely date for a next meeting. The Boards representatives advised that they were open to a further meeting under s.287 whenever suited the prospective applicants but that this would be most beneficial when the survey work and consultations referred to above were further advanced. Regarding the format of further meetings, the Boards representatives advised that this would be dependent on when prospective applicant submitted their request under s.287A and that either a single combined 287 / 287A meeting or separate 287 / 287A meetings could be held.
- The Board's representatives requested that the prospective applicant provide a shapefile of the boundary area for the proposed development.

Conclusion:

The record of the meeting will issue in due course and the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting. The Board will revert to the prospective applicant in relation to scheduling a further meeting.

The meeting concluded at 16:35pm.

A handwritten signature in black ink, appearing to read 'Stephen Kay', is written above a horizontal line.

Stephen Kay

Assistant Director of Planning