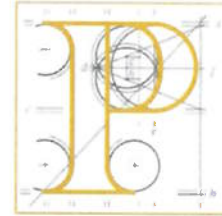


Our Case Number: ABP-319866-24



An
Bord
Pleanála

Brendan Regan
Delvin Road
Gormanstown
Co. Meath

Date: 14 August 2024

Re: Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm
Located off the coast of Counties Dublin, Meath and Louth (www.northirishsearraysid.ie)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission and fee in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

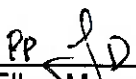
The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of Dublin City, Fingal, Meath and Louth County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to marine infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email marine@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,



Ellen Moss
Executive Officer
Direct Line: 01-8737285

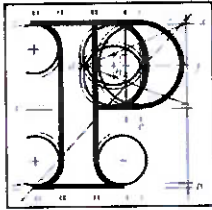
OA03

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Dublin 1
D01 V902



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Brendan Regan

(b) Observer's postal address

Delvin Road, Gormanston, County Meath K32 CR29

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else on this observation, please also write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not Applicable

(b) Agent's postal address

Not Applicable

AN BORD PLEANÁLA
LDG- 073899-24
ABP-
09 AUG 2024
Fee: € 50 Type: Card
Time: 17:02 By: hand

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

ABP - 319866

- (b) **Name or description of proposed development**

Statkraft (NISA) – North Irish Sea Array Offshore Wind Farm

- (c) **Location of proposed development**

(for example: 1 Main Street, BaileFearainn, Co Abhaile)

In the Irish Sea off the coasts of Counties Dublin (Fingal) Meath and Louth.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is no word limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Observation on Government green energy policy.

The Irish Governments Climate Action plan to speed up the transition from fossil fuel generated electricity to renewables to meet targets especially in respect of offshore wind, has led to legislation being rushed through Dail Eireann particularly in the early part of 2023, the setting up of the Marine Area Regulatory Authority (MARA) on 17th July 2023 and handing-over control of a substantial percentage of Ireland's electricity generating capacity to large mega-profit orientated multi-nationals.

These loss of control decisions, over time will be at great cost to the Irish taxpayer and eventually the electricity end user (all of us).

Statkraft NISA

Statkraft NISA were successful with their tender for the construction and operation off an offshore electricity generating wind farm in the Irish Sea, off the coasts of Fingal, County Dublin, County Meath and County Louth and were awarded a contract in the Irish government's first offshore wind auction in 2023 to develop 500 MW of green energy.

Reading through the Planning Application it appears that Statkraft NISA had pre-planning meetings, discussions and negotiations with An Bord Pleanala and the aforementioned Local Authorities from and/or before January 2023 and again prior to submitting the Planning Application on 7th June 2024.

CONTD/OVER

5. Grounds

"Walk-in" Public Consultations were advertised in three (3) local "free newspapers" and the Meath Chronicle Newspaper, all of these circulating on the eastern seaboard of the counties Louth, Meath and Dublin.

The advertisements appeared intermittently in these newspapers from the late Summer of 2023 until late Spring 2024.

The advertisement formats in these newspapers were two (2) column X 7.5mm high block advertisements.

Statkraft NISA did not advertise the public "walk-in" consultations in National Newspapers circulating in the Leinster Area or on National Radio and TV Stations.

I personally attended four (4) of these public "walk-in" consultations in County Louth, County Meath and County Fingal with other members of our community.

I observed and I was disappointed with the poor level of public attendance at the various day and evening time public "walk-in" consultations.

The reason for this I believe is the failure by Statkraft NISA to undertake a comprehensive widespread advertising campaign on National Public Media, Radio and TV stations.

"Walk-in" Public Consultations

These NISA staff with whom I conversed at the public walk-in consultations were pleasant and courteous.

The majority of the staff present indicated that they were based at the Statkraft NISA offices in Cork.

The NISA "community Liaison Officer" who accompanied the staff, I understand is from County Meath.

At the walk-in public consultations in addition to large artistic creative images, photomontages, charts/posters affixed to display units and easels,
CONTD/OVER

5. Grounds

very little detailed documentation apart from the NISA Project Booklet for Quarter Q3 2023 (attached) was only available at the Autumn 2023 public walk-in consultations. A folding A3 size leaflet was available to take away at subsequent public consultations.

In my opinion and that of others attending the walk-in public consultations and although promoted as question and answer sessions; I believe the primary aim was promotion of the NISA offshore wind farm.

At all four meetings which I attended, I requested the NISA community Liaison Officer and the support staff to arrange a PUBLIC MEETING in City North Hotel, Gormanston to inform and answer question about the proposed NISA project in a public forum.

Regretfully, this was politely refused initially and subsequently ignored.

Request for ORAL HEARING

Hence, I request An Bord Pleanála to arrange an ORAL HEARING as the comprehensive detailed Statkraft NISA Planning Application (in particular the A2 large scale Maps and Drawings) will be available.

Other reasons for an oral hearing is the issue of the difficulty of attempting to connect or piece together on a computer or laptop screen the offshore export cable route map, infrastructure, temporary and permanent access and service roads etc.

Also the proposed cable route between the onshore infrastructure at Balbriggan to Belcamp is not particularly well outlined on the Planning Application Maps because of the omission of the Townland and Street names on these maps.

Flight Paths for Dublin Airport and Gormanston Military Aerodrome

The flight path for aircraft landing and taking off in a westerly direction on the North Runway from Dublin Airport before heading for and arriving from
CONTD/OVER

5. Grounds

the UK and European cities frequently use a flight paths between Donabate and Gormanston (recent photo taken from aircraft over proposed NISA offshore wind farm site, on approach to Dublin Airport - attached) for An Bord Pleanála consideration.

The Irish Air Corps aerodrome at Gormanston is frequently used by light aircraft and helicopters for training and search and rescue missions.

The Irish Government have recently purchased new larger military aircraft for the defence forces which it is anticipated will lead to increased use of the military aerodrome. This should be taken into consideration by An Bord Pleanála in its assessment of the Statkraft NISA Planning Application.

Doppler Effect and Blade Flash from wind farm turbines

An Bord Pleanála are requested to examine the possibility and levels of interference both sound and electromagnetic deflection on both low flying aircraft, shipping, nearby Radar stations (Hollywood, The Naul, Co Dublin), mobile phone cells/antennas and TV signals.

Wind Turbine lighting and lightning protection.

Apart from the proposed NISA offshore wind turbine height (300metres), night time warning lighting and lightning protection are a serious issue for seashore communities, aircraft and migratory and native bird species.

The proposed location for the NISA offshore turbines is on both North to South and East to West Migratory Corridors.

Countries such as Italy, Spain, France and the UK are very conscious-of and protect as best they can these migratory routes.

Archaeology Geology and History.

CONTD/OVER

5. Grounds

The County Meath 10km coastline and coastal plane is unique in Ireland. It is the only coastline in Ireland consisting of sand, gravel and clay deposits, resulting from historic ice-age glacial expansion and glacial retreat. Coastal erosion has provided Meath with golden sand and silver beaches. These east coast beaches and planes are the "Gateway to Irelands Ancient East" (as advertised in tourism magazines and Bord Failte promotions). The first inhabitants of the Island of Ireland came ashore here during the Megalithic Era. The coastline of Meath and North County Fingal have a host of unexcavated megalithic mounds leading all the way from the coast inland to the Newgrange monument, a world heritage site. Tourism provides hundreds of jobs in the coastal resorts and at these historic sites. The protection of this historic part of Ireland, its tourist industry and farmland employment has been largely overlooked in the NISA Planning Application. We request An Bord Pleanala to ensure the protection of this area in their assessment of the NISA Planning Application.

County Fingal Development Plan 2023 – 2029

Having studied the Fingal Development Plan it appears that the Statkraft NISA proposed location for the proposed onshore infrastructure is not in an area Zoned for Industrial use. The citation on Map and Sheet No. 4 (ATT) (Balbriggan Area - north) designates the area "RU".

This designation is also translated on Sheet No.4 as follows :

"Protect and promote in a balanced way, the development of agriculture and rural related enterprise, biodiversity, the rural landscape and the built and cultural heritage".

An Bord Pleanala are requested to investigate any proposed changes to this designation – end.

CONTD/OVER

5. Grounds

Meath County Development Plan 2021 - 2027

An Bord Pleanála are requested to ensure that any development proposal (s) in the Statkraft NISA Planning Application offshore and onshore and within the jurisdiction of the Meath County plan are examined.

Offshore Wind Turbines ecologically and environmentally unfriendly.

The 300metre high offshore wind turbines proposed by Statkraft NISA in their Planning Application, impact on the above header as already stated in this observation, in addition the visual impact when located in Scenic Coastal and Mountainous areas cannot be overlooked.

At the proposed height of 300metres and situated close to the shorelines and Ireland's capital city Dublin, I request An Bord Pleanála to address and reduce both the height of the turbines and not to permit turbines to be located within 22km of our shorelines in accordance with European and EU norms.

Offshore wind turbines only provide an interim and not always reliable (when the wind does not blow) solution for our wind energy requirements.

Offshore wind turbines are expected to remain operational for approximately 17 – 23 years.

Tidal Turbines.

France, the USA, the UK and to a limited extent other European countries have limited numbers of operational tidal turbines.

Tidal turbines are more expensive to manufacture, maintain and install underwater than offshore wind turbines.

Tidal Turbines properly located and installed are more reliable.

Tidal Turbines are more environment friendly.

CONTD/OVER

5. Grounds

Onshore infrastructure associated with offshore wind turbines.

Onshore and inland infrastructure, installations, buildings, sub stations and battery electricity storage if permitted, must be set below the surrounding ground levels, banked with soil and with environmentally friendly screening (Trees/shrubs) to lessen the visual impact on the area and existing residential amenity.

Electromagnetic Fields associated with high Voltage cables

Ongoing research worldwide indicates that despite some scepticism there is so far no conclusive evidence to prove or to disprove this alleged health hazard. I request An Bord Pleanala to give this consideration particularly in respect of the 30km cables proposed between Balbriggan and Belcamp which are routed through densely populated residential areas.

Offshore and on land contamination.

An Bord Pleanala is requested to ascertain if the wind farm proposed in the Statkraft NISA Planning Application poses any risk in under this heading.

Uncertainties in the Planning Application.

The Statkraft NISA Planning Application uses the words proposed, temporary and transition on drawings Maps and in the write-ups which accompany their Planning Application.

This is not normal for Planning Applications as it includes variables which deviate from that which is accepted in a normal Planning Application.

From a layman's perspective this creates uncertainty which will hopefully be explained thoroughly if an Oral Hearing is granted.

CONTD/OVER

5. Grounds

Building Regulations and Standards.

It is presumed that Statkraft NISA are fully familiar with Irish Building Standards and Regulations and the United Nations Convention on the Laws of the Sea.

Conclusion.

I wish to thank most sincerely the staff in An Bord Pleanala offices in Dublin who have been very helpful at all times when I visited the offices and in the course of telephone conversations.

Brendan Regan.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fees included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes

Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029

BALBRIGGAN

Sheet No.4

Zoning Objectives

	CI - Community Infrastructure	Provide for and protect civic, religious, community, education, health care and social infrastructure
	GB - Greenbelt	Protect and provide for a Greenbelt
	GE - General Employment	Provide opportunities for general enterprise and employment
	HA - High Amenity	Protect and enhance high amenity areas
	HT - High Technology	Provide for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment
	LC - Local Centre	Protect, provide for and/or improve local centre facilities
	MC - Major Town Centre	Protect, provide for and/or improve major town centre facilities
	OS - Open Space	Preserve and provide for open space and recreational amenities
	RA - Residential Area	Provide for new residential communities subject to the provision of the necessary social and physical infrastructure
	RB - Rural Business	Provide for and facilitate rural-related business which has a demonstrated need for a rural location
	RC - Rural Cluster	Provide for small scale infill development serving local needs while maintaining the rural nature of the cluster
	RS - Residential	Provide for residential development and protect and improve residential amenity
	RU - Rural	Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage
	RV - Rural Village	Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved land use plan, and the availability of physical and community infrastructure
	TC - Town and District Centre	Protect and enhance the special physical and social character of town and district centres and provide and/or improve urban facilities



IMG_5921.jpeg



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Full screen



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