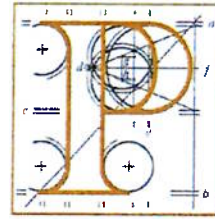


Our Case Number: ABP-319866-24

Planning Authority Reference Number:



**An
Bord
Pleanála**

Balbriggan Community Council
14 Hampton Street
Balbriggan
Co. Dublin

Date: 16 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

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



C/o 14 Hampton Street,
Balbriggan,
Co. Dublin

3rd August, 2024

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902

RE: North Irish Sea Array (NISA) Offshore Wind Farm

Ref: OA29N.319866

Dear Sir/Madam,

Balbriggan Community Council is in favour of Wind Energy and Offshore Windfarms, we feel it is important to find sustainable energy as a community and a nation, however we are also concerned about the biodiversity of Marine life offshore. We feel that in finding sustainable energy it cannot be at the cost of biodiversity and an ecosystem-based approach to Marine Spatial Planning, which is required under Directive 2014/89/EU (Marine Spatial Planning Directive). Balbriggan town is a growing diverse population which has seen many large developments in recent years. Balbriggan Community Council is making this observation on the planning application for the North Irish Sea Array Offshore Wind Farm Development:

Public Consultation

We attended all public consultation meetings in the Bracken Court Hotel. We believe that the public consultation was inadequate. At no stage were all the options made available to us. We feel this is in contravention of Aarhus Convention which accommodates public participation in decision making (Directive 2003/4/EC, Directive 2003/35/EC, Environment

(miscellaneous provisions) Act 2011) with the data used and missed in the analysis, data availability and bias, and methods used in the analysis.

The proposals by the NISA Wind Farm development are:

Option 1: 49 number wind turbine generators with a tip height of 290 metres above astronomical tide

Option 2: 35 number of wind turbines generators with a tip height of 316 metres above lowest astronomical tide when located outside the Dublin Airport controlled airspace and 311 metres above lowest astronomical tide when located inside the Dublin Airport controlled airspace. 13 of the 35 wind turbine generators for option 2 will have a tip height of 311 metres, due to the location within the controlled airspace.

These wind turbines will have an operational life of 35 years. These options are based on the Offshore distance beginning at 15.9km from Balbriggan shore. We believe that this distance is not meeting with International best practice. It is important that the installation of these turbines is in the right place for the right reasons, and the development is not completed at 15.9km because it costs less. There is a need for a scale measurement of the possible detrimental effects of nearshore wind farm turbine construction affecting marine biosystems at 15.9km, in view of EU policy preference of locate offshore wind energy generation at the 22km mark.

There is little evidence in the planning application as the impact of drilling Offshore, how that is to be delivered and what affects it will have on the community.

“Oceans and coastal marine systems play a significant role in the global carbon cycle. They represent the largest long-term sink for carbon, whilst also storing and redistributing CO₂. Some 93% of the earth’s CO₂ (40 Tt) is stored and cycled through the oceans (Nelleman et al., 2009)”. Marine Institute. We believe that drilling will disturb the carbon sequestration, and this will be lost over the period of the operational life of the turbines over the period of 35 years.

Environmental Impact

The North West Irish Sea SPA requires consent - *ARC 30 Any activity intended to disturb birds, including by mechanical, air, gas, wind powered or audible means* - when works are being considered.

“The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

European and national legislation places a collective obligation in Ireland and its citizens to maintain habitats and species in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites – (National Wildlife and Parks Service)”

Birds

Wind turbines have significant implications for bird populations resulting in habitat loss for large soaring birds, breeding, wintering and migrating birds due to their placement. This displacement is attributed to disturbances, habitat loss and the barrier effect. The barrier effect occurs when birds alter their migration path to avoid turbines. Displacement of bird populations can occur during construction, regular operation or if there is frequent maintenance of wind turbines.

In this area North-West Irish Sea SPA it lists the bird and mammal/fish which require protection, they include but not limited to:

- Red throated Diver (A001)
- Rosette Tern (recognised European site of importance)
- Manix Shearwater (A013)
- Kittiwak (A188)

This development will have a significant impact during Autumn/Winter which will reduce the population and therefore cause significant decline.

Mammals/fish

The grey seals/dolphins/basking sharks which have been surveyed off this coast will be hugely affected during the construction; they are protected under the Wildlife Act 2023 which

“Requires certain public bodies, including government departments, agencies and local authorities to consider biodiversity in their plans, policies, decisions and actions”

Also included in this list are the harbour porpoise which are protected under Article 6 (3) of the Habitat directive.

The effect of the Turbines on marine life includes site disturbance, the inability for them to access their normal breeding ground, the noise levels affecting their sonar ability, which in turn would have a significant impact on their life.

We believe that typical species, associated species and associated habituates are inadequately considered with respect to effects on sites of community importance. We also feel that ex-situ species and habitats are inadequately considered with respect to effects on sites of community importance.

These are reasons why the installation of the wind turbines be located at the appropriate distance Offshore we would recommend a distance of 25km.

Archaeological Impact

There are two major Archaeological sites around the Offshore/Onshore Development. The first one is Offshore at Bremore, this is the site of the wreck of the Belle Hill, which happened over a hundred years ago in 1875. This site is protected under Section 3 of the National Monuments Act 1987/National Monuments Act 2004.

The second major Archaeological site is Neolithic site and according to Dr Mark Clinton of An Taisce “two cemetery complexes must be considered within the greater context of other passage tombs nearby at Knowth, Dowth and Newgrange” also “it would be more appropriate that the World Heritage site of Bru na Boinne be extended to include Bremore – Gormastown complexes.... In terms of archaeological importance Bremore is comparable to Tara. Tara

started with a passage tomb known as The Mound of the Hostages and developed over different periods, likewise the Bremore tombs would appear to be the start of Bru na Boinne”.

We believe that these are significant sites that must have protection and that there is clarity to how the NISA development ensures their protection.

Community Impact

At the public consultations they proposed the development would come Onshore at Bremore, just south of the Sailors Grave. However, we see from the site notice that it proposed to have “permanent access to the landfall site for maintenance purposes will be from the junction of the R132 and Bells Lane”. Bells Lane is a public right of way. It is a busy Lane where people walk to the beach, if all or part of this lane is closed off it would cause great distress to the Community. It would also have a knock-on effect to Bremore Castle, Cardy Rock residents and a Creche facility. The proposed route for the cable will be along the R132, Harry Reynolds Road, and return to the R132 on the north side of the town. The impact of the laying of the cable will be hugely disruptive. The R132 has already been dug up at least two times, the last time was to install the pipes to bring the sewerage from Stamullen, Co. Meath to Quay Street, Balbriggan. Presently Harry Reynolds Road is being upgraded to include new paths and cycle paths at a cost of €8 million. To have these roads dug up again will be a waste of Taxpayers money.

The building of two six storey buildings behind the proposed development of 500 houses. Presently Fingal County Council are developing a Local Area Plan (LAP) for this area in Flemington. According to the planning application there will be temporary water connections which will link in with the existing water system with in the R132, this will mean digging this road up again, we are not clear the timeline for this. The impact of the Substations on this development by the height differential, the noise levels and the possible extension over time when handed over to Eirgrid.

We are not clear from the Planning application how long this development will take from start to finish and feel that the impact to Community life has not been considered. We are also concerned with the impact on the culture of our community and the knock-on effects on people’s mental health. We believe the information provided does not provide complete,

precise and definitive information capable of removing reasonable doubt as to the effects of those works.

Possible future alternatives

1. We propose that the least harm can be done to marine life by putting the wind turbines out to 25km in the north end of the licence area.
2. Reduce the number of turbines in Option 1 or Option 2, which will still allow NISA to reach its target of 500MW
3. That the Onshore cable be delivered by another route avoiding the Harry Reynolds Road which would lead to Stephenstown Industrial estate and link in with the Eirgrid there.
4. That there be a timetable developed for appropriate planning of the schedule of works and the delivery of the development.

Yours faithfully,

Alice Davis – Chairperson, Balbriggan Community Council

References:

1. JNCC Publication <https://hub.jncc.gov.uk>
2. Fairseas <https://fairseas.ie>
3. Blue Carbon and Marine Carbon Sequestration in Irish Waters and coastal Habitat – Marine Institute
4. An Taisce – Save Bremeore