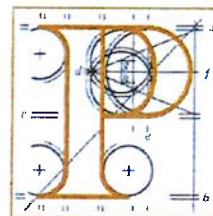


Our Case Number: ABP-319866-24

Planning Authority Reference Number:



**An
Bord
Pleanála**

Gormanston Community Association CLG
Peter Brady
Beau Vallon
Delvin Road
Gormanston
Co. Meath
K32 EW62

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

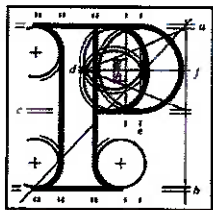
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D01 V902



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

Peter Brady Chairperson Gormanston Community Association CLG

(b) Observer's postal address

Beau Vallon, Delvin Road, Gormanston, Co. Meath, K32EW62

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

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

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)

OA29N.319866

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

Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm (www.northirishsearraysid.ie)

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

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Located off the coast of Counties Dublin, 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).

1. The Gormanston Community Association CLG, incorporated in 2015, wish to make this observation to help to ensure that the planning application you are assessing will meet Ireland's expectations for sustainable and economic provision of renewable energy.
2. At a very early stage in the design of the proposed development, the North Irish Sea Array Windfarm Ltd initiated engagement with the Gormanston Community. The Gormanston Community Association CLG kept in contact with the representative of the company in addition to attending community briefing sessions in nearby hotels. Please note that in **Volume 8: Appendices (Introductory) Appendix 1.2 Consultation Report Page 7** the organisation was incorrectly listed as Gormanstown Community Association. The key concern for most residents was the visual effect that the windfarm would have on the seascape and their impact on vistas from Gormanston beach. The photomontages presented in the early engagements appeared to allay most residents' concerns. However, the planning application now has WTG tip height at 290m in option 1 and a max tip height of 316m in option 2 which would appear to be considerably in excess of what was originally presented in the photomontages. The relative spacing of the WTGs has also changed significantly and no photomontage of the current layout has been

5. Grounds

presented to the best of our knowledge. Residents are consequently unsure of the visible impact of the WTGs on the horizon and are disappointed with this aspect of the planning application. Given the lack of reasonable notice concerning significant aspects of this development, the time frame allowed for observations and objections being very short for a development of national importance, we are of the opinion a full public hearing should be convened to require the developer the opportunity to provide an accurate and up to date presentation of the visual, environmental and archaeological impact of this project, and thereby afford a notion of natural justice to those with valid vested interests.

3. In **Volume 10 Onshore Appendices - Appendix 25.4 Cultural Heritage and Mitigation Strategy** the heading on Page 1 is labelled as “draft”. The exact status of this document should be clarified and confirmed. This document also states that “the onshore archaeology, architectural and cultural heritage assessment has been conducted with the assumption that the onshore cables will be located anywhere within the landfall/grid facility site and all archaeological features identified in this area have the potential to be impacted”. If a comprehensive archaeological survey was conducted then the location of the onshore cables could be better defined and the impact on features could be minimised. There is no contextual recognition of the enormous national importance of these protected archaeological sites and their significance and relationship to the current UNESCO sites in the Boyne Valley. The mound complexes in the vicinity of Bremore Head and Gormanston Beach have not had the recognition of similar sites in the Boyne Valley and no funding has been

5. Grounds

allocated to them to be properly excavated and researched. These sites predate the celebrated sites in the Boyne Valley and are arguably of more importance to our understanding of early settlement and social structures on the island of Ireland. The use of mitigation strategies that allow an inevitable level of damage/destruction rather than prioritising preservation strategies relegates the known and unknown archaeology of the area in a manner which will result in a loss only equal to that of the decisions made in relation to Wood Quay.

4. We were advised by the Developer that the ports of Belfast and Liverpool would be used during the construction phase. We were assured that no new port was required to be constructed for this project. We would urge planners to make it a condition that the Developer is restricted to those ports identified and that no local port, harbour or beach (other than the landfall site identified) is required for their project.
5. In the Environmental Impact Assessment Report (EIAR), we are concerned that some of the surveys appear to have gaps in their survey coverage. The surveys do not appear to be multi seasonal which would cover different migratory birds, but also from our perspective they would appear to have a focus on Gormanston Beach and not the immediate hinterland e.g. there is no mention of the short-eared owl which nests directly beside the subject area.
6. In **Volume 3: Offshore Chapters - Chapter 18 Offshore Archaeology and Cultural Heritage** there is an analysis of the archaeological importance, and potential archaeology of the Bremore

5. Grounds

area, both onshore and extending through the intertidal area to the nearby seabed. There is a high number of protected wrecks in the vicinity of the proposed area. While known wrecks are listed there is huge potential for other as yet unknown wrecks to be discovered or exposed during construction activity e.g. a 7-metre long prehistoric dugout was discovered on the seabed during the construction of the Gas Interconnector on Gormanston Beach. The entire Bremore complex is known to be rich in archaeology, and as noted above much of it yet to be fully realised. We are very concerned that the archaeology of intertidal area and seabed which has the potential to be of national importance may be irreversibly damaged or indeed lost without a comprehensive survey being conducted first and more robust mitigation and preservation measures being implemented. Any conditions applied to this development must ensure the strictest preservation standards for our national heritage.

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 fee is 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