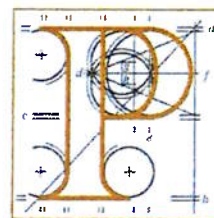


Our Case Number: ABP-319866-24

Planning Authority Reference Number:



An
Bord
Pleanála

Hampton Cove Residents' Association
22 Hampton Cove
Balbriggan
Co. Dublin
K32 W425

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.

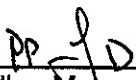
The Board will revert to you in due course with regard to the matter.

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
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála (ABP)
64 Marlborough Street
Dublin 1.
D01 V902

c/o 22 Hampton Cove
Balbriggan
Co. Dublin
K32 W425

9th August, 2024

RE: Planning Application for a North Irish Sea Array (NISA) Offshore Wind Farm ¹
ABP Reference No.: **OA29N.319866** ²

**Observation on behalf of the members of
Hampton Cove Residents' Association (HCRA), Balbriggan**

To whom it concerns at ABP:

This observation to ABP on the Planning Application for a North Irish Sea Array (NISA) Offshore Wind Farm -ABP Reference No.: OA29N.319866 is hereby submitted by HCRA on behalf of our members.

Hampton Cove (see Addendum 1) in Balbriggan is a coastal residential estate comprising 187 dwellings built over a number of years in the early-to-mid 1970s. The estate is situated on the East coast, on the south side of Balbriggan town, just off the R127, will have clear sight of the proposed wind turbines and Balbriggan is the proposed location for bringing the power cables ashore to two new Electricity Transformers to be built near Bremore to the north of the town.

OBSERVATION

1.

General points:

Understanding of the need for and justifications for the exploitation of wind energy, including from suitable marine-based wind turbine farms is pervasive and accepted by societies across the world, particularly in the contexts of global climate change, carbon-based drivers of this climate change (and their negative impacts), and the growing imperative to move to clean, renewable energy – for multiple, substantial reasons.

¹ www.northirishsearraysid.ie

² <https://www.pleanala.ie/en-ie/case/319866>

HCRA does not have relevant expertise (in windfarm technologies, environmental or biodiversity considerations, or planning and/or other pertinent Legislation and Regulations) in our membership, nor does it have easy access to such expertise and knowledge.

Against the above background, and based on feedback from public consultations conducted by the proposer (Statkraft³), on reading of some of the available literature on Government guidelines, multiple concerns (biodiversity and community-based) and precedents for marine-based windfarm proposals^{4 5 6 7}, on our consultations with other local community groups, on inter-personal discussions at committee level and among members, and commentary on our members' local online network - our observation reflects the views and some concerns of our members.

2.

Summary views of our members:

- Marine-based turbines should be located at 25km+ distance from shore – concerns include loss of amenity and current high quality aesthetic *, excessive size and height of turbines if closer to shore, exacerbation of coastal erosion (vibrations and alterations to flow patterns and sand bed movements), and negative impacts on biodiversity – ref. newly designated Marine Special Protection Area North East⁸;
- Technology for floating turbines is advancing rapidly – at a speed that may outstrip the current proposed technology, and should be used to support the 25km distance objective;^{9 10}

³ <https://www.statkraft.com/about-statkraft/>

⁴ <https://www.gov.ie/en/publication/9d0f66-draft-revised-wind-energy-development-guidelines-december-2019/#:~:text=Draft%20Revised%20Wind%20Energy%20Development%20Guidelines%20December%202019,-From%20Department%20of&text=The%20draft%20Guidelines%20now%20being,community%20dividend%20and%20grid%20connections.>

⁵ <https://www.bluehorizon.ie/offshore-wind-ireland/#:~:text=This%2C%20together%20with%20the%20introduction,25%20km%20from%20the%20shore.>

⁶ <https://www.rte.ie/news/leinster/2024/0727/1462115-wicklow-wind-farm/>

⁷ <https://www.rte.ie/news/business/2023/0720/1395631-claims-of-inadequate-collaboration-in-wind-industry/>

⁸ <https://www.npws.ie/protected-sites/spa>

⁹ <https://simplybluegroup.com/project/emerald-floating-wind/#:~:text=The%20Emerald%20Floating%20Wind%20Project,of%20up%20to%201.3%20GW.>

¹⁰ <https://windenergyireland.com/latest-news/5743-floating-wind-energy-can-make-ireland-a-renewable-superpower>

- There is a clear preference among members – although not directly affected by the proposed locations for bring cables ashore to new Transformer installations – that ‘greenfield sites’ should be used for bringing cables ashore and that the Transformer infrastructure should be built well away from residential areas, schools etc. There are ample such locations both north and south of Balbriggan, Drogheda and Skerries. The current proposal (including the cross-town route from the Transformers to an Eirgrid connection) is majorly disappointing and concerning given the concerns expressed repeatedly in the Consultations
- Our understanding is that the landing area for the cable’s coming ashore (Bell’s field and environs) and parts of the route to the proposed Transformer buildings are close to and may encroach upon important historical/archaeological sites e.g. a raised beach from c. 3 million years ago, Neolithic monuments, ancient graveyards and a commemorative grave from a shipwreck in mid 1800s. We expect and would assume that ABP will pay close attention to such matters and considerations when deciding upon permission for the proposals
- We have no specific knowledge or expertise vis a vis the local fishing industry, types of fishing carried out and traditional fishing waters and rights; in regard to these matters, we expect and assume that ABP will give due consideration and protection to existing legal fishing rights
- There is no or insufficient clarity in the proposal regarding ongoing maintenance of the windfarm over its 35 year lifespan, obsolescence and the responsibility for decommissioning and removal of end-of-life turbines; similarly, with regard to ownership and rights to sell on the windfarm during its working life – our members would like to see pre-conditions in any planning permission given that would protect contracted high standards across all operational and maintenance responsibilities – in the event of a change of ownership

(note i) that a significant number of members indicate willingness to make some sacrifice of amenity and aesthetic in recognition of the seriousness of the climate change threat and in solidarity with places around the world already badly affected by climate change, note ii) that many of our members wish to be assured – by State Agencies (including ABP and the relevant Government Departments) of a fair and determined balance between risk and reward for the developer of such a massive, complex infrastructural development, and the effort and investment put into addressing legitimate concerns), and note iii) that our members are very conscious of the overt political push to progress wind farm developments and legitimately expect

that political considerations should not unduly influence the independent planning process or relevant decision making.

- HCRA was very well represented at the Public Consultations on NISA. Also, a member of our committee was cold-called by Statkraft very early in the process and canvassed for views and opinions at two informal meetings. Our member submitted written comments and questions including concerns about distance from shore and where cables would come ashore (by email) to Statkraft, and resubmitted same at the final Public Consultation. Statkraft claimed to have addressed the questions and concerns in the Consultations, but did not provide the requested written response. Now in the submitted proposal, the distances from shore are considerably less than the emerging standard, and the cables are landing for Transformer processing in a dense, built up area. Regrettably and understandably based on what has transpired in the proposals– it seems that the Consultations may have been a box-ticking exercise, and this perception fuels a number of the concerns expressed above.

3.

Conclusion.

HCRA reiterates that by and large our members accept the need for and justifications for exploitation of marine-based wind energy. We are reliant on the State's Agencies including ABP and the various Government Departments to ensure that the NISA project is legislatively compliant and that a determinedly fair balance is achieved between the demands for sustainable and renewable energy, deployment of the optimum technological and infrastructural solutions, the risk/reward profile for the developer, and the legitimate interests and concerns of our community and our members.

We conclude by thanking ABP for the opportunity to make this observation and anticipate a fair and acceptable solution.

With kind regards,

Peadar O'Kelly
Chairperson
Hampton Cove Residents' Association
on behalf of our members.

Addendum 1

Map excerpt from ABP Case Ref. No. OA29N.319866 annotated to show location of Hampton Cove residential estate in Balbriggan:

