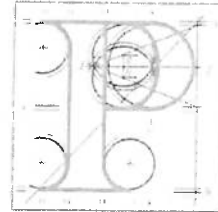


Our Case Number: ABP-319866-24



An
Bord
Pleanála

Eugene McKeown
Truskey East
Barna
Co. Galway

Date: 11 July 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 Council, Fingal County Council, Meath County Council, Louth County Council 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
Ellen Moss
Executive Officer
Direct Line: 01-8737285

OA03

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 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



Marine Application Observation

Online Reference
MAR-OBS-000007

Online Observation Details

Contact Name
Eugene McKeown

Lodgement Date
10/07/2024 14:14:33

Case Number / Description
319866

Payment Details

Payment Method
Online Payment

Cardholder Name
Eugene McKeown

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3Pb0LtB1CW0EN5FC0PZFZyks

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Name: Eugene McKeown

Postal Address and : Truskey East,

Correspondence Address: Barna,
Co. Galway.

Bord Pleanála Case reference: OA29N.319866

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

Subject matter of the submission or observation:

The Environmental Impact Assessment Report (EIAR) submitted with the application is incomplete and does not adequately describe the effect of airborne noise on the environment. Further information should be provided by the developer.

Specifically, Volume 5, Wider Scheme Chapters, Chapter 30, Noise and Vibration, Section 30.5.7.1 states that 'a noise source sound power level of 115 dBALw for each WTG – a source representative (sic) of a large offshore WTG of the type proposed...'

Reasons, considerations and arguments on which the submission or observation is based:

Part X Environmental Impact Assessment of the Planning and Development Act, 2000 requires the Board to carry out an Environmental Impact Assessment based on the report submitted with the application. The EIAR does not:

- a. Present the method of calculation used for wind turbine noise.
- b. It does not present any supporting documentation for the sound power level (source level) of the wind turbines. A 'representative' level could mean anything.
- c. The EIAR does not state whether any uncertainty factor (as good practice would require) has been used in the calculations.

It is not possible to test or verify the modelling used or the results obtained without this information. The Board is being asked to accept a result (unsupported by any evidence) on an important impact which cannot be verified. If the Board cannot verify the calculation it could be considered a lacuna in their assessment.

The importance of sound power level data to support and verify the results presented in the EIAR is demonstrated at Section 30.5.2.1 of the EIAR where sound power level data is provided for the piling operation.

Sound power level information has been provided to the Board in case 319799 - Proposed development known as Oriel Wind Farm off the coast of County Louth.

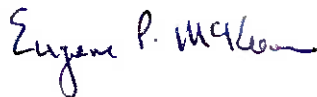
It is the practice in the UK to provide sound power level data with the environmental report e.g. Rampion 2 ES Chapter 21 Noise and vibration (planninginspectorate.gov.uk).

It is also the practice to provide sound power level data supported by evidence with the environmental report in Denmark and Germany.

I respectfully submit that the Board should request the following additional information:

- a) Maximum sound power level data for all the candidate turbines proposed in the EIAR in octave bands from 63 Hz to 8000 Hz at a range of wind speeds;
- b) The cut-in wind speed of the candidate turbines;
- c) The wind speed at which the candidate turbines reach maximum output;
- d) The cut-out windspeed of the candidate turbines;
- e) The maximum sound power level data of the candidate turbines from the cut-in wind speed to the wind speed they reach maximum output at 1 m/s intervals; and
- f) A declaration as to whether the sound power levels are WARRANTED sound power levels or not.

Yours Sincerely,

A handwritten signature in blue ink, reading "Eugene P. McKeown". The signature is written in a cursive style with a long, sweeping underline.

Eugene McKeown

10 July 2024