Outlook

OA29N.319866-24 North Irish Sea Array-Significant Additional Information

From Yvonne Jackson <Yvonne.Jackson@failteireland.ie>
Date Wed 10/21/2026 12:21 PM
To Marine <marine@pleanala.ie>

1 attachment (434 KB)
OA29N.319866-24 Submission-Fáilte Ireland.pdf;

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A Chara,

Fáilte Ireland would like to take the opportunity to make a submission to significant additional information from the applicant regarding planning application ref: OA29N.319866-24. Planning Permission for proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm off the coast of counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas).

The attached submission has been prepared by Fáilte Ireland, the National Tourism Development Authority. I would be grateful if you could send a reply email acknowledging receipt of submission.

Regards,

Yvonne

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Fáilte Ireland | Turasóireacht Náisúnta An tÚdara Eorbartha National Tourism Development Authority

An Coimisiún Pleanàla

64 Marlborough Street,

Dublin 1

21 October 2026

ABP Ref.: **OA29N.319866**

Applicant: **North Irish Sea Array Windfarm Ltd**

Re: **Submission in relation to the Response to Further Information provided for a Marine Development - Application under Section 291 of the Planning and Development Act 2000, as amended, for:**

Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm off the coast of counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas).

An EIAR and a NIS have been submitted with the application.

An Addendum to the EIAR and an Addendum to the NIS have been submitted with the response to the request for further information.

To whom it may concern,

This submission is made in relation to the consideration of tourism aspects in the response provided on behalf of the applicant to Item No. 13 (a) of the Request for Further Information (RFI) issued by An Coimisiún Pleanàla (ACP) on 10 April 2025. This submission should be read in conjunction with Fáilte Ireland's observation on the consideration of tourism aspects in the original application (19 August 2024).

Introduction and Background

In the original submission Fáilte Ireland set out the context to the tourism environment potentially impacted by the proposed development and highlighted observations and comments on the assessment of tourism-related aspects. In conclusion, we requested that that An Bord Pleanàla (now An Coimisiún Pleanàla) give detailed consideration to the following points:

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Áras Fáilte, 88–95 Sráid Amiens
Baile Átha Cliath 1
D01 WR86
Éire

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Áras Fáilte, 88 - 95 Amiens Street
Dublin 1
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- the adequacy of the detail provided in the description of the baseline tourism environment, particularly in terms of the absence of characterisation or sensitivity applied to the tourism environment
- the lack of a sufficiently detailed consideration of the potential construction and specifically the operation phase impacts on tourism,
- the absence of a sufficiently considered assessment of potential cumulative impacts on tourism, potentially along the full extent of the east coast of Ireland, and
- the appropriateness of the proximity and scale of the proposed development given its specific location along east coast.

We note and welcome that in requesting further information of the applicant, ACP included RFI Item 13(a):

> ***"13. Seascape, Landscape, and Visual***
>
> *a) The Board notes the concerns raised by Fáilte Ireland in respect of the subject application. The applicant is requested to provide further detail and justification in relation to the effects on tourism, having regard to the Failte Ireland observation."*

Response to the Request for Further Information

The response to the above RFI is provided is two principal ways: first under Section 3.5: Tourism, Recreation and Amenity of the Submission Response Report, and secondly in the Addendum to the EIAR – and specifically in Chapter 33 Socio-Economic, Tourism and Recreation and in Chapter 38 Cumulative and Inter-Related Effects. We note that the responses provided to RFI Items 13(b), 13(c), 13(d), and 13(e) in the Submission Response Report and the Addendum to Chapter 29 Seascape Landscape and Visual are also of relevance to the consideration of potential effects on Tourism.

We also acknowledge and appreciate that during the course of responding to the RFI, the consultants for the applicant engaged with Fáilte Ireland in April 2026 in relation to the points raised in our submission of August 2024.

In responding to RFI No. 13(a), the applicant notes in the introduction to the Addendum to Chapter 33 of the EIAR, that:

> *"The Developer engaged with Fáilte Ireland in April 2026 to discuss the concerns raised (see Appendix A1.2). The concerns raised by Fáilte Ireland have been addressed in Sections 33.2, 33.3, 33.5, 33.7, 33.9 and 33.10 This includes the update of a baseline description of places within the study area that evoke a sense of place.*

The assessment has also been updated to include impacts on the experiential nature of places that evoke a sense of place across the construction, operation and decommissioning of the proposed development. Following consultation with Fáilte Ireland, the cumulative effects assessment has been updated to incorporate Arklow Bank II into the overall assessment of the Phase One projects on tourism receptors."

Consideration of a '*sense of place*' in the assessment of impacts on tourism is introduced as Section 33.2.4.3, and would highlight its value in its definition as a "*function of the interaction between physical setting, cultural associations, patterns of activity and experiential qualities that together underpin destination identity.*" Key areas that evoke a sense of place within the study area are bullet-pointed at a county by county level in Section 33.3.9.5. While noting that Dublin Bay and the coastline of Dublin City is omitted, we welcome the inclusion of this detail. The section would have benefited from an overview of the sensitivities of a 'sense of place' and how these areas combine and interact in underpinning tourism across the region. In Section 33.5.3.3 assessment of the operational stage impact of the development on a 'sense of place', defers to the Seascape Landscape and Visual assessment and fails to address the impact of the experiential nature of a sense of place as it relates to tourism.

While we welcome the introduction of considerations around a 'sense of place', the remainder of the assessment of the impact on tourism presented in Addendum Chapter 33 of the EIAR remains largely unchanged and there is no change in the assessment of impacts on tourism. This is especially so in relation to the assessment of cumulative effects, where the assessment, including the Addendum Chapter 38, fails to adequately reflect the potential significant level of operational stage impact that could arise from almost continuous views of near shore wind turbine developments extending along the Irish Sea coast from the Ards Peninsula in County Down to the north Wexford coast – a straight line distance of over 250km.

Therefore, we would ask that An Coimisiún Pleanàla in their assessment to continue to have detailed consideration of the following:

- to give consideration of the potential construction and specifically the operation phase impacts on tourism,
- to adequately consider the assessment of potential cumulative impacts on tourism, potentially along the full extent of the east coast of Ireland.

Yours sincerely,

Shane Diver

Manager-Environment & Planning