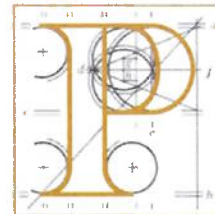


Our Case Number: ABP-319866-24



An
Bord
Pleanála

Louth County Council
County Hall
Millennium Centre
Dundalk
Co. Louth

Date: 29 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 submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this 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 the coastal planning authority 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

OA15

Tell	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

CHIEF EXECUTIVE REPORT

Application to An Bord Pleanála under Section 291 of the Planning and Development Act, 2000 as amended for permission for the North Irish Sea Array (NISA) Offshore Wind Farm

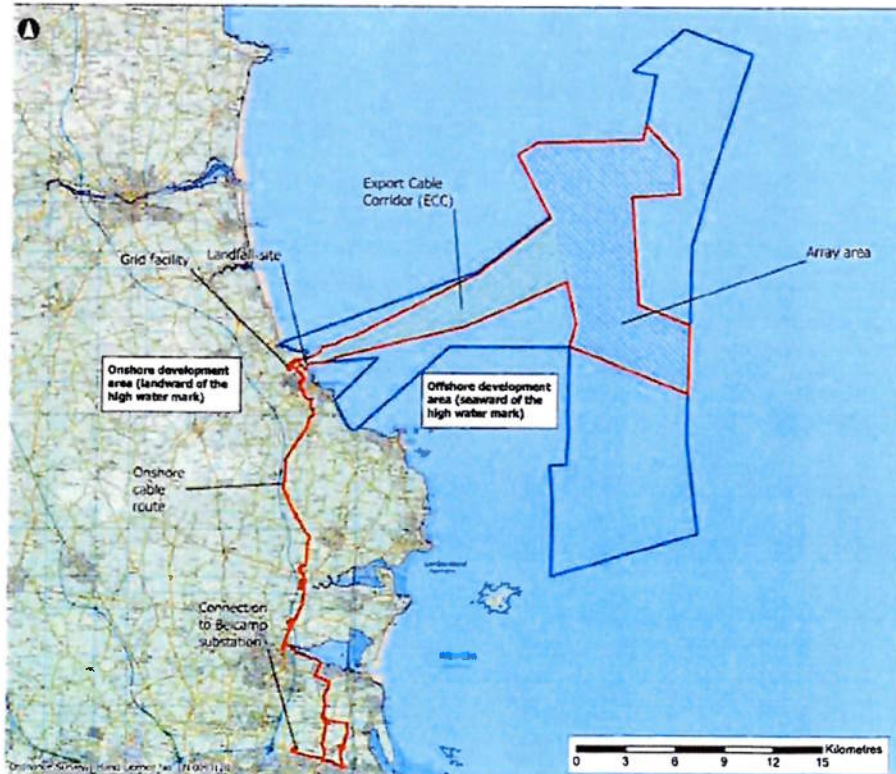
Applicant: North Irish Sea Array Windfarm Limited
Maximum Export Capacity: 700MW
No. of Turbines: Between 35 and 49

Board ref. No.: OA29N.319866

1.0 Location:

- 1.1 The proposed windfarm is located off the coast of counties Dublin, Meath and Louth and onshore infrastructure will be within County Dublin (Fingal and Dublin City Council administrative areas). The area where the turbines are to be located is irregular in shape. The nearest proposed turbine will be in excess of 11km from the coastline.
- 1.2 The position of the array is east to south east of the coastline of Louth. This area is scenic coastline and as such is an important natural asset and tourist destination for the County. The location map below highlights the site area in red where the turbines and cable corridor will be located.

Figure1: Location



2.0 Development Description:

- 2.1 The development comprises of an offshore wind farm consisting of wind turbine generators, offshore substation platform and subsea cables, landfall and associated infrastructure, grid facility and associated infrastructure, and onshore cables and grid connection.

The planning application is seeking to construct between 35 and 49 offshore wind turbine generators with a capacity of approximately 700MW which is the equivalent of powering 500,000- 700,000 homes. The proposed cable landing point is at the transition joint bays close to the shoreline at Bremore Bay, north of Balbriggan, Co. Dublin. The connection from the onshore cables to the national electricity transmission network at Belcamp Substation, Co. Dublin also.

- 2.2 The application form describes the proposal, (at a high-level overview) as being for:

Offshore Infrastructure - located within an array area and export cable corridor:

- Offshore wind turbine generators (WTGs) and their associated foundations
- Inter-array cables which will connect the WTGs to the offshore substation platform
- An offshore substation platform and associated foundations
- Offshore export cable(s) which will deliver the generated power from the offshore substation Platform to the high-water mark (HWM) as defined by Ordnance Survey Ireland mapping (the HWM being the transition point between the offshore and onshore infrastructure).

Onshore Infrastructure:

- Offshore export cable(s) from the HWM to the landfall transition joint bays
- Transition joint bays where the offshore and onshore export cables are joined
- Onshore export cable(s) from the transition joint bays to the grid facility
- A grid facility, comprising a compensation substation and Bremore substation together within ancillary infrastructure
- Onshore cable(s) from the grid facility to the Belcamp Substation
- A connection from the onshore cable(s) to the national electricity transmission network at Belcamp Substation.

The landfall will comprise both offshore and onshore infrastructure, with the HWM being the point of transition between the two. The export cables come ashore and transition to onshore cables at the transition joint bays close to the shoreline at Bremore Bay, Co. Dublin.

- 2.3 This proposed development includes two project options for consideration.

3.0 Design details and mechanics of development

- 3.1 The array area covers approximately 89km². At its closest point, the array area is located approximately 11.3km from land in water depths of approximately 30m to 63m below lowest astronomical tide.
- 3.2 The wind turbines are designed such that they have external platforms so that a crew vessel can access turbine for maintenance. The offshore inter-array cables will connect the turbines into 'strings and each string will be connected to the offshore substation. The inter-array cables will be buried to depths that are determined by seabed conditions.
- 3.3 The proposed development includes two project options for consideration. The arrangement of the turbines is also indicated along with the cable corridor below. Source: Environmental Impact Assessment Report

Fig 2: Proposed Layout – Project Option 1 (49 wind turbine generators)

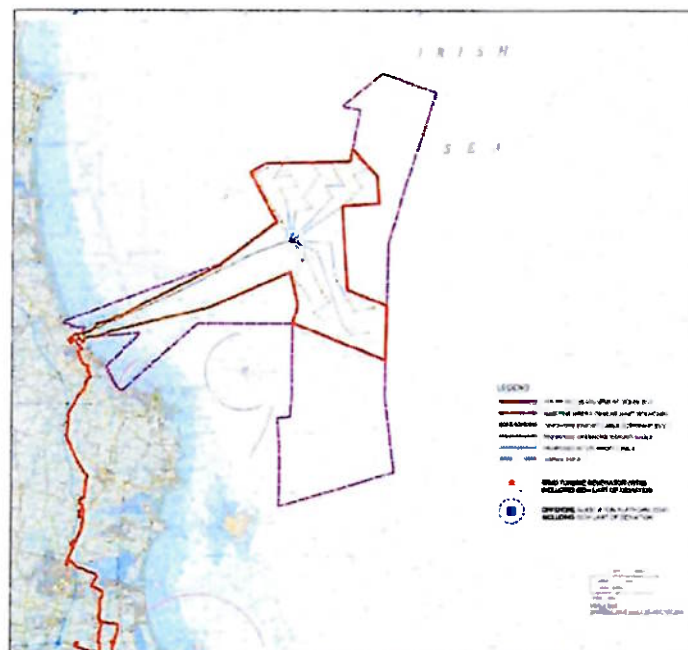
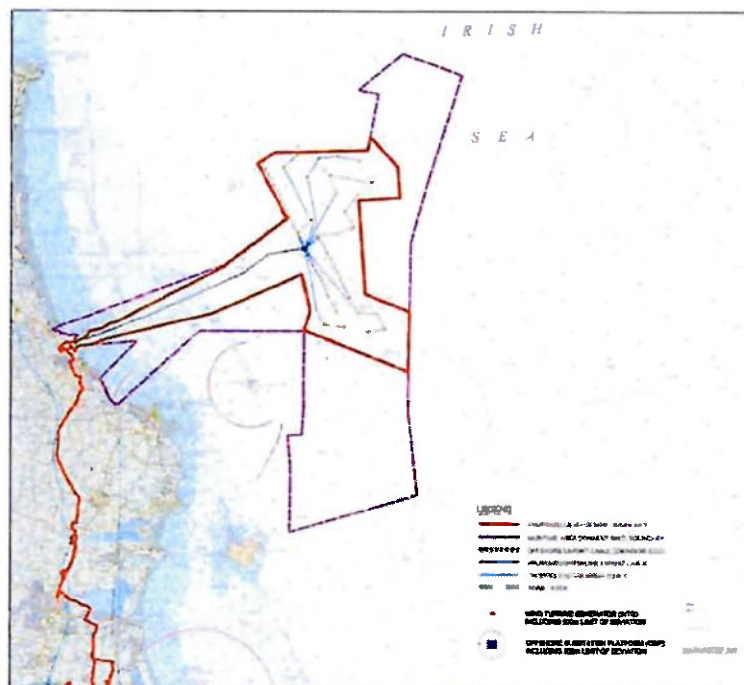


Fig 2: Proposed Layout – Project Option 2 (45 wind turbine generators)



3.4 In relation to the turbines themselves the two project options for consideration are:

Option 1 – 49no. turbines with a height of 290m and rotor diameter of 250m.

Option 2 – 35no. turbines with a height of 276m and a rotor diameter is 236m.

The nacelle of the turbines oscillates meaning the turbines will turn into the direction of the wind. The table below shows the key design parameters of the proposed turbines.

Table 1: Key design parameters of the proposed turbines (Source EIAR).

Parameter	Project Option 1	Project Option 2
Number of Wind Turbine Generators (WTGs) (Turbines)	49	35
WTG tip height (m above lowest astronomical tide)	290	316 outside aviation restricted zone, 311 inside aviation restricted zone*
Rotor Diameter (m)	250	276
Hub height (m above lowest astronomical tide)	165	178
WTG Foundation type	Monopiles	Monopiles or multi-leg pin piled jackets (hereafter referred to as 'jackets')
Number of OSPs	1	1
OSP foundation type	Monopile(s) or jacket foundation	Monopile(s) or jacket foundation
Offshore export cable length (km)	18	18
Inter-array cable length (km)	111	91

- 3.5 Substructures and foundations required to support turbines are fixed to the seabed and are required to withstand wave and wind forces and a wide range of meteorological conditions in the offshore environment. The foundation types that are being considered in - Project Option 1 – monopiles and – Project Option 2 - monopiles or jacket foundations (three or four leg configurations, with pin piles).

Image 1: Typical turbine on a monopile foundation
(Source of images- EIAR)



Image 2: Typical turbine on a jacket foundation



- 3.6 Offshore Substation Platform is a hub where all the energy produced by the turbines is brought together via inter-array cables and stepped up by transformers to a high voltage transmission of 220kV high voltage alternating current for export onshore via the offshore export cables. The location of this platform for the two options is within the sea array area and within a 500m limit deviation. There are 3no. foundation design options proposed, namely jacket, one monopile and two monopile. Images of jacket and one monopoly stations are set out below. The offshore substation will not be manned but it will be subject to periodic operational and maintenance visits.

Image 3 : Typical Offshore Substation on monopile foundations (Source EIAR)



Image 4 : Typical Offshore Substation on jacket foundations



- 3.7 The offshore cable corridor covers an area of approximately 36km² and is approximately 11.3 km in length and makes landfall south of Bremore. An offshore export cable will transmit electricity from the offshore substation to the landfall point where this cable will connect with the onshore transmission infrastructure. A transition joint bay serves the purpose of connecting the offshore subsea cable to the onshore cable at the landfall location. The joint is fully buried concrete chamber which is located as close to the high-water mark as is feasible in order to minimise the length of offshore export cable on land. After cable installation, the TJB will be covered by soil / sand or similar and the original surface will be reinstated.
- 3.8 The onshore cable route runs for approximately 33-35km between the proposed grid facility at Bremore and the grid connection point at Belcamp. For most of the route (approximately 29km out of the 33km), the cables will be laid in ducts in a trench in the footprint of existing roads including the R132 road, the R106 road and other local roads in order to connect the offshore cable at the transition joint bay to 2no. 220 kV substations in the townland of Bremore, Co. Dublin. The cable route will cross a number of watercourses, as well as the M1 Motorway, gas transmission pipelines and the East-West Interconnector along its length. The construction methodology to be adopted for these crossings will vary. Horizontal directional drilling will be used where standard open cut trenching techniques are not possible. The majority of the onshore cable route is within public roads but also includes seven identified locations where the route may, or will, move offline.
- 3.9 There is a need for buried cable joint bays along the onshore element of the cable because the cables are manufactured in specific lengths of approximately and during installation, each cable length must be jointed to the next cable at set intervals of in a cable joint bay (typically 10 m x 2.5 m x 2 m). The cable joint bays are buried and not visible and the majority are proposed to be located under the public road.

Link boxes and communication chambers will also be required along the onshore cable route. These are smaller pits, compared to joint bays, which house connections between the cable shielding, joints for fibre optic cables and other auxiliary equipment.

- 3.10 The grid facility will be located on lands , currently in agriculture in the townland of Bremore, Co. Dublin. A compensation substation will be contained with a rectangular compound 110m by 190m in proximity to the Bremore substation. The substations will include a building of approximately 17m in height together with lightning rods. The substation equipment will be maintained by the Transmission Asset Owner (ESB Networks) and operated by the Transmission System Operator (EirGrid). The substation will connect to the existing Belcamp overhead line.
- 3.11 There are temporary compound sites proposed for the duration of the construction works which is typical of a development of this scale.

4.0 Legislative Provisions:

4.1 Marine Area Consent

A Marine Area of Consent application (MAC) is now required to occupy the sea and in this instance, one was granted by the Minister to NISA.

As per section 287 of the Planning and Development Act the applicant entered into pre-application consultations with ABP. File ref. No. 315801-23 refers. The pre-application consultation was closed following a determination on 2nd February 2024. This application is lodged under Section 291 of the Act.

4.2 Design Flexibility

Design Flexibility is being sought as part of this application and was the subject of pre-application consultation with ABP via Section 287A of the Act. File ref. no. 316332-23 refers.

The Design Flexibility opinion includes flexibility for the following aspects of the proposed development:

- Turbines – model, number, and dimensions (tip height, rotor diameter, rotor swept areas, nacelle height and hub heights)
- Turbine foundations – type and pile dimensions
- Offshore substation platform – foundation type and dimensions (height above sea level, length, and width)
 - Siting of infrastructure – fixed location with limit of deviation (turbines, foundations, export cable and offshore substation platform location)
- Offshore cabling – subsea cable size and subsea cable length

An Bord Pleanála determined that it was appropriate to allow for design flexibility in the developer's proposed planning application because of "ongoing advances in technology and the recognition of the need to install the most efficient and effective project elements in relation to turbine, turbine foundations, offshore substation platform, siting of infrastructure and offshore cabling (subsea cable size and subsea length). It is of note that the Board decided not to accept the request for design flexibility for the extent and nature of the protection for the subsea cable associated with the development.

4.3 Provisions of section 291 of the Act

This provision sets out the requirements that the applicant must fulfil. It also provides for the makings of submissions.

A coastal planning authority—

(a) within—

(i) whose nearshore area, or

(ii) any other part of whose functional area,

it is proposed that the development concerned would (in whole or in part) be situated, or

(b) whose nearshore area, or any other part of whose functional area, adjoins that part of the maritime area in which it is proposed that the development concerned would (in whole or in part) be situated,

may, not later than 10 weeks (or such longer period as may be specified by the Board) from the making of the application under this section in respect of the proposed development, prepare and submit to the Board a report setting out the views of the coastal planning authority in relation to the proposed development, having regard in particular to the matters to which a coastal planning authority is required to have regard in accordance with *subsection (2) of section 34* and *subsection (2) of section 282* in relation to an application referred to in *subsection (3) of section 281*.

(6) The chief executive of a coastal planning authority shall, before that coastal planning authority submits a report to the Board under *subsection (4)* in relation to a proposed development, submit the report to the members of the coastal planning authority and request their views on the proposed development.

(7) The members of a coastal planning authority may, by resolution, decide to attach recommendations specified in the resolution to the report of the coastal planning authority under *subsection (4)* and, where those members so decide—

(a) those recommendations, and

(b) a record prepared by the meetings administrator (within the meaning of section 46 of the Local Government Act 2001) of the views expressed by the members on the proposed development,

shall be attached to the report submitted to the Board under that subsection.

4.4 Marine Planning Policy Statement

Ireland's first Marine Planning Policy Statement provides for the preparation, adoption and review of statutory marine planning policy statements on six-yearly cycles. It reflects the comprehensive updating and renewal now underway of Ireland's marine planning system, setting out core principles to inform evolving marine planning and development management process.

The Marine Planning Policy Statement:

- Describes the existing components of Ireland's marine planning system.
- Outlines a vision for the future development of our marine planning system.
- Sets out the overarching policies and principles the Government expects marine planning bodies and other Public Bodies that engage with the marine planning system to observe (in terms, for example, of public engagement, transparency, governance, environmental assessment, climate action, social and economic benefit); and

- Sets out high-level priorities for the enhancement of the marine planning system in Ireland. This Marine Planning Policy Statement serves as a parallel to the 2015 Planning Policy Statement, which underpins the operation of the entire land planning system in Ireland.

The Statement sets out a vision for marine planning as follows: “A marine planning system with clear forward planning, development management and enforcement elements that promotes and sustains ocean health, and supports the sustainable (recreational) enjoyment, management and use of Ireland’s marine resource.”

4.5 Project Ireland 2040: The National Marine Spatial Plan

This plan sets out that marine spatial planning is a process that brings together multiple users of the ocean to make informed and coordinated decisions about how to use marine resources sustainably. It is a process by which the relevant public authorities analyse and organise human activities in maritime areas to achieve ecological, economic and social objectives. A marine spatial plan – in Ireland known as the NMPF – is the outcome of that process.

The NMPF is a national plan for Ireland's seas, setting out, over a 20-year horizon, how we want to use, protect and enjoy our seas. The NMPF sits at the top of the hierarchy of plans and sectoral policies for the marine area. The plan has been informed by existing sectoral plans and will, in turn, be used to inform future cycles of those plans in an ongoing feedback loop. It provides a coherent framework in which those sectoral policies and objectives can be realised.

Chapter 13 of this plan pertains to Energy: Offshore Renewables Energy (ORE). Key policy objectives are outlined below that are directly relevant to this application:

ORE Policy 1 Proposals that assist the State in meeting the Government's offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users.

ORE Policy 2 Proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (OREDPA) and its successor. Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime. Into the future, areas designated for offshore energy development, under the Designated Marine Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting (or development of our marine resources) (Note – see Appendix D on Spatial Designation Process).

ORE Policy 4 Decisions on ORE developments should be informed by consideration of space required for other activities of national importance described in the NMPF.

ORE Policy 8 Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required.

ORE Policy 9 A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. Where a development consent is applied for in an area already subject to permission, proposals must include a visualisation assessment to inform design and layout. Visualisation assessments should demonstrate consultation with communities that may be able to view the proposal, in addition to any other ORE development, which had received consent to proceed at a given site at the time the consent application is made, with the aim of minimising impact. Visualisation assessments will be informed by specific emerging guidelines (detailed in the actions set out in Annexes to

this NMPF). Prior to specific guidelines being available, policy and best practice relating to visualisation assessment should be used. This consideration must be included as part of statutory environmental assessments where such assessment is required.

ORE Policy 10 Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible.

4.6 Louth County Development Plan 2021-2027 as varied (Plan).

Relevant key strategic objective.

SO 4: Transition to a low carbon and climate resilient County supporting energy efficiency and reducing energy demand, through a combination of mitigation and adaptation responses to climate change. This includes for increased usage of renewable energy through developing indigenous energy resources, supporting the transition to a low carbon economy by 2050, and ensuring flood risk management. The Council will work with other bodies and organisations as appropriate, to identify and help protect critical infrastructure.

Section 10.6 of the County Development deals with wind energy. In particular, section 10.6.1 deals with off shore wind development.

Relevant policies are set out below.

IU 49: To support international, national and county initiatives for limiting and reducing emissions of greenhouse gases through energy efficiency and the development of renewable energy sources at suitable locations, utilising the natural resources of the County, in an environmentally acceptable manner subject to normal proper planning considerations including in particular the impact on areas of environmental or landscape sensitivity.

IU 50: To co-operate with the appropriate authorities both north and south of the border in the provision of all-island renewable energy.

IU 53: To promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 10.1, to prohibit such infrastructure in areas identified as 'no-go areas' and to consider, C1 – Public subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

IU 55: To support the implementation of the EU Green Deal, Climate Action Plan 2019 (or any subsequent plan), Programme for Government 2020, Climate Change Adaptation Strategy for County Louth and the Climate Action Charter and facilitate measures which seek to reduce emissions of greenhouse gases.

IU 56 To encourage the development of wind energy, in accordance with Government policy and guidance and the 'Wind Energy Development

Guidelines' (2006) or any revisions thereof which may be issued during the lifetime of the Plan.

IU 57 To facilitate the development of wind energy in an environmentally sustainable manner ensuring proposals are consistent with the landscape preservation objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.

IU 58 To promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 10.1, to prohibit such infrastructure in areas identified as 'no-go areas' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

5.0 Assessment

5.1 The format of this report is such that sets out commentary under each of the following headings, as per the Act.

1. the implications of the proposed development for maritime spatial planning,
2. the implications of the proposed development for proper planning and sustainable development
3. the likely effects on the environment or any European site of the proposed development, if carried out.

An Bord Pleanála is the competent authority in respect of EIA and AA, the planning authority will rely on them to carry out the relevant assessments in accordance with the Environmental Impact Assessment Directive and the Habitats Directive. In this regard, the Board should be aware that there are a number of significant European sites in county Louth not least the Boyne Coast and Estuary Special Area of conservation which includes most of the tidal sections of the River Boyne, intertidal sand and mud flats, salt marshes, marginal grassland, and the stretch of coast from Bettystown to Termonfeckin that includes the Mornington and Baltray sand dune systems. The site extends to over 400 hectares and is an important wintering waterfowl sites that supports thousands of waterbirds. The turbines are located some distance from the bay itself. However, the flight paths of the birds should be considered. The potential for 'In – Combination' effects will be important.

5.2 Implications of the proposed development for maritime spatial planning,

Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishes a framework for maritime spatial planning. All coastal Member States of the Europe Union have prepared national maritime spatial plans under the Maritime Spatial Planning (MSP) Directive. Ireland's Marine Spatial Plan is called the National Marine Planning Framework (NMPF) and was formally launched on the 1st of July 2021. This framework applies to a maritime area of

approximately 495,000km², outlines a vision for how we want to use, protect and enjoy our seas in the years up to 2040.

The NMPF contains a vision, objectives and planning policies for all marine-based human activities. It outlines how those activities will interact with each other in an increasingly pressured ocean space. Maritime spatial planning will contribute to the effective management of marine activities and the sustainable use of marine and coastal resources.

The NMPF sets out that a *"secure, sustainable and affordable supply of energy is of central importance to Ireland's economy and social wellbeing. Ireland has some of the best offshore renewable energy resources in the world....the initial focus for ORE will be in developing wind in the shallower waters off Ireland's eastern and southern coasts."*

The subject development is considered acceptable in principle from a maritime spatial planning perspective and seeks to deliver on the national government's objective of delivering off shore wind energy so as to deliver decarbonisation targets. This needs to be balanced with ensuring marine eco-system conservation.

The Array Area and the Cable Route Benthic Survey Reports are noted. Surveys included grab samples of the sea bed, drop down videos and sediment collection in the intertidal areas. Analysis of same have been undertaken which ascertain the different sea floor habitats that pertain to these areas.

It is also noted that impacts on offshore suspended sediment/deposition at construction, decommissioning, operation and maintenance stages in relation to qualifying interests in the Natura Network were considered alone and in-combination and findings concluded that there was no potential for adverse effects and as such are not considered to have long term negative implication for marine planning.

The Board is recommended to take on board any comments received from the Commissioner of Irish Lights so as to ensure there is a coherent network of visual and electronic aids to navigation in the subject waters. Safe navigation for all sea users is key in particular for fishing vessels.

A Dumping at Sea permit is required for the disposal of a substance or material at sea under the Foreshore and Dumping at Sea (Amendment) Act 2009. The soil and rock arising from the drilling for the installation of the foundations for the Project will be returned to the area adjacent to the foundation location. It is important that dispersion of the drill arisings are minimised. This should also be considered in the context of short-term impacts to navigational routes for other vessels as well as appropriate assessment issues that may arise.

5.3 Implications of the proposed development for proper planning and sustainable development

Ireland's Offshore Renewable Energy Development Plan (OREDPP) identifies the Irish marine area as one of the most productive in Europe, with a potential for large scale development of offshore renewable energy technologies. Offshore wind energy will play a key role in helping to achieve national renewable energy and decarbonisation targets through use of renewable energy sources. These targets are driven by European policy, with the European Union (EU) setting overall renewable energy targets for the EU, and specific targets being set for each member state. The Revised Renewable Energy Directive sets an overall renewable energy target of at least 42.5% binding at EU level by 2030. The CAP 2024 targets 80% renewable electricity in Ireland by 2030. The widespread development of offshore wind energy is a vital vehicle for achieving our renewable energy targets and as such this project will be a key contributor in achieving these targets.

The government has set a national target of at least 5 GW (i.e. 5,000 MW) of offshore wind energy by 2030 in the CAP which is a significant target to reach in 6 years. This proposal will contribute 375MW to this target. National Strategic Outcome 8 of the NDP is to transition to a climate neutral and climate-resilient society. Climate Actions Plan 2024 also promotes the role Ireland's electricity sector can play in the decarbonisation of other sectors through electrification, including transport, heating and industry. The proposal also accords with the policy objective set out in the Regional Spatial and Economic Strategy for EMRA which seeks "to support the sustainable development of Ireland's offshore renewable resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements."

The Louth County Development Plan also supports the development of offshore windfarms subject to proper planning and sustainable development. The site in question is located beyond the 'no-go' areas identified in the Plan and as such is acceptable in principle at this location.

I am satisfied that the details submitted and photomontages contain adequate assessment of the visual impacts both on the seascape and landscape of the area in question along the coastline. The Louth coastline is typically broad estuarine bays, beaches and low-lying lands. There will be a visual impact as the turbines will be seen generally along coastal areas and higher grounds inland. In Louth this visual impact will be more apparent towards the south of the county, in headland locations and from higher ground levels including the Cooley Mountains. However, it is not considered such that detracts from the views along the coastline. I note that in-combination visual impact with other maritime proposals including the Oriel windfarm have not been considered.

It is noted that the applicant sought an opinion under Section 287B of the Act, as amended by the Planning and Development, Maritime and Valuation (Amendment) Act, 2022 in respect of design flexibility pertaining number and dimensions of turbines; turbine foundations – type and pile dimensions; offshore substation platform – foundation type and dimensions (height above sea level, length, and

width); siting of infrastructure – fixed location with limit of deviation (turbines, foundations, export cable and offshore substation platform location) and offshore cabling – subsea cable size and subsea cable length.

The elements of the proposed development for which design flexibility is sought is understandable in a rapidly changing technological environment and the potential for unexpected ground conditions. The EIAR has considered the worst-case scenario in respect of each of these elements.

It is noted that the Board did not accept the request for design flexibility for the extent and nature of the protection of subsea cables associated with the proposed development as this element was considered to relate to normal construction practices that are intrinsic to the installation for the development. Where a grant of permission is considered, the Board should ensure that final details in respect of the design flexibility elements are submitted in advance to the planning authority for prior written agreement that the final design elements are consistent with the design flexibility sought.

5.4 Likely effects on the environment or any European site of the proposed development, if carried out.

The marine environment is transboundary in nature, with species, currents and other living and non-living features freely crossing jurisdictions. Periods of breeding, rearing, hibernation and migration are considered to be especially sensitive periods in relation to disturbance. The Board should satisfy themselves that the proposals have demonstrated that they can be implemented without adverse effects on the integrity of European Sites and as such align with the planning policies set out in National Marine Planning Framework. These policies have been reinforced with planning policy objectives set out in the Louth County Development Plan 2021 as varied.

The risk of introduction of and or spread of non-indigenous species must be avoided and / or minimised. A condition requiring a bio-security action plan including monitoring of potential opportunities for the introduction and avoidance of non-native species should be attached to any grant of permission. Vessel traffic to offshore platforms should also be minimised.

The Board should ensure that there are adequate water quality mitigation measures are put in place to ensure there is no deterioration in water quality status.

Volume 2 of the EIAR provides details on alternatives considered in relation to site selection, layout and proposed infrastructure and in relation to the cable corridor. The planning authority is generally of the view that the final design and layout is such that would minimise impact both from a visual impact and also an environmental perspective, although the latter is for the Board to determine as the competent authority.

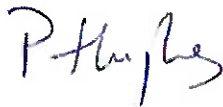
It is noted that the development avoids European sites.

6.0 Conclusion

- 6.1 In essence, the project is considered critical in terms of contributing to the overall targets set out as part of the binding targets set for reduction in greenhouse gas emissions. The Louth County Development Plan supports the principle of offshore windfarms that demonstrate they will not have a significant impact on the environment. The planning authority will rely on the Board as the competent authority to undertake the EIA and AA assessments in line with legislative provisions.

7.0 Recommendation

- 7.1 It is recommended that the Board **grant permission** for the subject off shore windfarm subject to conditions that ensure that the proposal is in accordance with the plans and particulars submitted and does not give rise in conflicts in terms of mitigation measures across the various reports submitted. As noted in this report, a design flexibility condition should be attached with details to be submitted for the written agreement of the planning authority prior to commencement of those elements of the development.



Patricia Hughes
Senior Executive Planner
02/08/2024



Joe McGuinness
D/Chief Executive

6/8/24