
Observation on NISA Further Information

From Alice Davis <alicemarydavis@gmail.com>

Date Tue 10/20/2026 3:43 PM

To Marine <marine@pleanala.ie>

 1 attachment (183 KB)

Balbriggan Community Council Observation on NISA.docx;

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Dear Sir/Madam, Please find attached our Observation on Further Information for the Applicant NISA ABP-319866-24. We made an original observation on 3rd August, 2024.

Your faithfully

Alice Davis

Chairperson

Balbriggan Community Council



Balbriggan Community Council CLG

Comhairle Phobail Bhaile Brigín CLG

Company Limited by Guarantee | Cuideachta faoi Theorainn Ráthaíochta

An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902

20th October, 2026

Application Reference: ABP-319866-24

Development: North Irish Sea Array (NISA) Offshore Wind Farm

Developer/Notice Party: North Irish Sea Array Limited (Statkraft/CIP)

Submission regarding: Response to Further Information Request/Significant Additional Information

From: Balbriggan Community Council CLG

Directors | Stiúrthóirí: Alice Davis, Anne Marie Brady, Mary Whyte, Aisha Alameen Betro

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Dear Sir/Madam,

Balbriggan Community Council is in favour of Wind Energy and Offshore Windfarms, we feel it is important to find sustainable energy as a community and a nation; however, we are also concerned about the biodiversity of Marine life offshore. We feel that in finding sustainable energy it cannot be at the cost of biodiversity and an ecosystem-based approach to Marine Spatial Planning, which is required under Directive 2014/89/EU (Marine Spatial Planning Directive). Balbriggan town is a growing diverse population which has seen many large developments in recent years. We wish to make an observation following the request for further information by An Coimisiún Pleanála. Our original observation was made on 3rd August 2024.

Public Consultation

We attended all public consultation meetings in the Bracken Court Hotel. We believe that the public consultation was inadequate. At no stage were all the options made available to us. We feel this is in contravention of Aarhus Convention which accommodates public participation in decision making (Directive 2003/4/EC, Directive 2003/35/EC, Environment (miscellaneous provisions) Act 2011) with the data used and missed in the analysis, data availability and bias, and methods used in the analysis.

The Applicant makes substantial changes to the foundation method, array layout, dredging and the Grid Facility. We ask the Commission to be satisfied that the public and Community organisation have had a fair opportunity to consider these changes.

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The proposals by the NISA Wind Farm development are:

Option 1: 49 number wind turbine generators with a tip height of 290 metres above astronomical tide

Option 2: 35 number of wind turbines generators with a tip height of 316 metres above lowest astronomical tide when located outside the Dublin Airport controlled airspace and 311 metres above lowest astronomical tide when located inside the Dublin Airport controlled airspace. 13 of the 35 wind turbine generators for option 2 will have a tip height of 311 metres, due to the location within the controlled airspace.

These wind turbines will have an operational life of 35 years. These options are based on the Offshore distance beginning at 15.9km from Balbriggan shore. We believe that this distance is not meeting with International best practice. It is important that the installation of these turbines is in the right place for the right reasons, and the development is not completed at 15.9km because it costs less. There is a need for a scale measurement of the possible detrimental effects of nearshore wind farm turbine construction affecting marine biosystems at 15.9km, in view of EU policy preference of locate offshore wind energy generation at the 22km mark.

Environment Impact Offshore

The North West Irish Sea SPA requires consent - *ARC 30 Any activity intended to disturb birds, including by mechanical, air, gas, wind powered or audible means* - when works are being considered.

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“The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in the Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

European and national legislation places a collective obligation in Ireland and its citizens to maintain habitats and species in the Natura 2000 network at favourable conservation condition. The Government and its agencies are responsible for the implementation and enforcement of regulations that will ensure the ecological integrity of these sites – (National Parks and Wildlife Service)”

Offshore Ornithology

The Applicant concludes that all construction operation and decommissioning impacts on birds are not significant and that no additional mitigation is needed. We question this for the following reasons:

Survey gap: Aerial surveys ran from May 202 to October 2022 and from September 2024 to August 2025. There is no survey data for roughly two years (November 2022 to August 2024), in a baseline said to reflect “current conditions”.

Overlap with European site:

The Array area and export cable corridor lie within the North-West Irish Sea Candidate SPA (2,333km², designated for 21 seabird species). Rockabill, Lambay Island, Irelands Eye, Skerries Islands and Boyne Estuary SPAs are also identified as relevant. The status of the current SPA and the conservation objectives for each qualifying interest must be addressed.

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Collision risk:

The claim that the increased air draft reduces collision risk “by up to 80%” is a maximum and applies only to certain species. The effect on the Kittiwake, gull and other species using the tracking data (Lambay Island and Maggies Leap) must be quantified.

Cumulative effects:

The additional information states that birds “may already be habituated” to existing wind farms, which treats other developments as baseline. That approach should not reduce the in-combination assessment with the other East Coast Phase One projects.

Monitoring:

The commitment is only to participate in the East Coast Monitoring Group, and the need for strategic monitoring will be “determined” later. No monitoring is secured.

Marine Mammals

The grey seals/dolphins/basking sharks which have been surveyed off this coast will be hugely affected during the construction; they are protected under the Wildlife Act 2023 which

“Requires certain public bodies, including government departments, agencies and local authorities to consider biodiversity in their plans, policies, decisions and actions”

Also included in this list are the harbour porpoise which are protected under Article 6 (3) of the Habitat directive.

The Applicant states that removing monopiles and using suction-bucket jackets means no significant noise effects. We ask the Commission:

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- Ensure that any permission prohibits impact piling, so the screening conclusion remains valid;
- Require the Marine Mammal Mitigation Protocol, passive acoustic monitoring, deterrent devices and at-source noise abatement (bubble curtains), which the Addendum describes as applying “if required”, to be mandatory and agreed in advance with the NPWS; and
- Be satisfied, beyond reasonable scientific doubt, the project will have no adverse effect on the integrity of any European site, alone or in combination, as required by Article 6(3) of the Habitats Directive.

Offshore archaeology and heritage

The Applicant identifies one shipwreck location in the Array area, nine possible wreck or debris locations in the export cable corridor, four wrecks in the wider study area, two aircraft losses and three palaeogeographical features. We note that:

- The residual effect is reduced from significant to not significant only on the basis of a future Marine Archaeology Management Plan, exclusion zones and a protocol for discoveries, none of which is yet in final form;
- The baseline relies on geophysical survey lines that do not cover the whole array area, and the Addendum accepts there is potential for unknown wrecks;
- The 1875 Belle Hill wreck (WA7000), which lies close to the export cable corridor and is protected as a wreck over 100 years old, there is a need for a specific assessment and a nearshore survey date be integrated before a decision is made;

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We ask that the Marine Archaeology Management Plan, exclusion zone sizes and survey requirements be finalised and approved by the Department before commencement, as a condition.

Environmental Impact Onshore

Onshore Archaeology

The Applicant states that seven areas of archaeological potential were identified at the landfall site and four at the Grid facility. It accepts that the construction at the Grid facility is likely to have direct, negative impacts on its four areas, with potentially very significant effects, and that these impacts could not be avoided by the footprint of the infrastructure. For the landfall, it states that all seven areas could be affected in the worst case.

The mitigation described relies on avoidance “where possible”, further test trenching after detailed design, and, if avoidance fails, preservation by record (excavation). We believe excavation destroys the monument. It is not equivalent to preservation in situ, which the Addendum itself calls the preferred method. We ask the Commission to:

- Require the applicant to demonstrate that the Grid Facility and landfall layouts cannot be adjusted to avoid the identified areas, before excavation is accepted
- Attach conditions requiring preservation in situ as the default, with exclusion zones fixed on the approved drawings;
- Require the final residual effect on each of the eleven areas to be stated, as the Addendum does not do so; and

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- Note the newly identified side AH38, the recorded holy well and the ecclesiastical enclosure at St Doolagh's, which depend on monitoring and avoidance measures that must be secured by conditions.

Construction noise at Balbriggan and Flemington

The Applicant itself rates the effect on the nearest planned homes as **“Major”**, which is significant on its own scale. It reduces this to “Major-moderate” only through tree planting that screens the 17 m buildings “over time” (RFI Response Report, p. 79). Until the trees mature, the effect remains significant.

The improved building finish is “subject to final agreement with EirGrid and Fingal County Council”. The noise enclosures could be replaced, “alternatively”, by lower-noise units (Response to Submissions Report, section 3.1.4.2; RFI Response Report, p. 79). Mitigation is not secured.

The Bremore substation is designed “to accommodate potential future connections from other projects” (Response to Submissions Report, section 3.1.2). The application does not say what this could mean for Bremore.

The Applicant predicts “very significant temporary adverse impacts” for each stage of construction if night-time works occur along the cable route, some 24-hour working at the Grid Facility and landfall, and a likely significant residual effect at on the Flemington Local Area Plan. It concludes there is no likely significant effect because the works are of a short duration.

The applicant's own figures (Response to Submissions Report, section 3.2.5.3) show:

- single-lane closures on the R132 south of Balbriggan for **99 weeks**;

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- single-lane closures on the newly upgraded Harry Reynolds Road for **15 weeks**;
- a full closure of the R132 north of the town for **1–2 weeks**.

We ask the Commission to restrict night-time and 24-hour working by condition, set enforceable noise limits and require a community liaison plan for Balbriggan.

Conclusion

As stated before, Balbriggan Community Council supports offshore wind. We want Ireland to meet its climate targets, and we want it to do so without causing lasting harm to the seabirds, marine life and coastline of north Fingal. We also wish that the Commission to consider the enormous work and disruption to the Community of Balbriggan. We ask the commission to, at the very least make no decision until there is:

1. A statutory public consultation
2. Full disclosure is made regarding the ability to put the turbines offshore at least 22km of shore
3. That alternatives are considered for this project off the coastline of north Fingal.

We thank An Co Coimisiun Pleanála for the opportunity to make this observation.

Yours faithfully,

Alice Davis

Chairperson

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