

Observation on the Further Information: North Irish Sea Array Offshore Wind Farm

To: The Secretary, An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Case reference: ABP-319866-24

Development: North Irish Sea Array (NISA) Offshore Wind Farm, in the Irish Sea off the coasts of Counties Dublin (Fingal), Meath and Louth

Subject: Observation on the Significant Further Information submitted by North Irish Sea Array Windfarm Limited (Statkraft) in response to the Commission's request of 10 April 2025

From: Brendan Regan, Delvin Road, Gormanston, County Meath K32 CR29

Date: 20 October 2026

Introduction

I live on the Delvin Road in Gormanston and made a written observation on this application in 2024, to which the developer has replied as Submission No. 14. As a previous observer on this case, I understand that no further fee is payable.

I write as an individual resident of Gormanston and not on behalf of the Gormanston Community Association, of which I am a member. I support the submission lodged by the Sustainable Windfarm Environmental Group (SWEAG) and ask the Commission to consider my observations together with it. I welcome the developer's decision to drop pile driving, but having read the further information as best I can, my concerns from 2024 remain, and I set them out below with particular regard to Gormanston.

1. The impact on Gormanston

Gormanston lies on the east coast, just north of the River Delvin, a short distance from where the export cable would come ashore and the grid facility would be built at Bremore. Our village is less than four kilometres downwind of the project's onshore site. The further information (FI) submitted dismisses the effects of proximity on the local population present and future for the wind farm's expected lifespan.

- **The view from our beach.** The turbines would stand up to 316 metres high, and the developer's own photomontage from Gormanston beach puts the nearest of them about 17.5 kilometres away. Its assessment accepts that the greatest effect on the seascape falls on the coast between Clogher Head and Skerries, which takes in Gormanston, even though it describes that effect as not significant.
- **Our shoreline birds.** The foreshore from the mouth of the Delvin to Cardy Rocks is a winter feeding and roosting ground for curlew, Brent geese and other waders and wildfowl, many of them migrants. Thousands of birds are a familiar sight here, including flocks of over a thousand curlew, a red-listed species, yet the developer's counts never went above 91 curlew. In summer, Arctic and roseate terns from

Rockabill also feed along this shore. The developer's wintering bird surveys stopped short at the Delvin, so the Gormanston side of the river was not properly covered.

- **The road to Balbriggan.** The R132 is the road most of us use to reach Balbriggan and the M1. The developer plans a full closure of the R132 north of Balbriggan and lane closures in and around the town lasting close to two years, and it accepts that the effect on local communities would be significant.
- **Gormanston aerodrome.** The Commission asked the developer to confirm, after consulting the Irish Air Corps, that the project would not significantly affect the Gormanston military practice and exercise area. The developer reports a meeting with the Department of Defence, but I could find no written confirmation from the Air Corps in the further information.
- **No meeting in Gormanston.** Despite repeated requests, the developer has never held a public meeting in Gormanston, as I explain in Section 5.

2. Five wind farms together

NISA is one of five Phase One wind farms planned off our coast, along with Oriel, Dublin Array, Codling and Arklow Bank 2, and more are planned on the UK and Isle of Man side of the Irish Sea. Between them they would place very large turbines along much of the east coast, and I do not believe their combined effect has been properly studied.

- Of the 21 bird species protected in the North-west Irish Sea area, where NISA would be built, only one is assessed together with the other wind farms, on the grounds that no other wind farm lies inside the boundary. The seabirds concerned range widely across the Irish Sea and would meet those other wind farms as well.
- The terns of Rockabill, home to most of north-west Europe's roseate terns, are left out of the combined assessment altogether.
- The developer itself admits there is "no consistent evidence base across projects to support a robust in-combination assessment".

If birds lose their feeding grounds to NISA, they will look for food elsewhere, north towards Rockabill and Oriel or south towards Dublin Array and Codling, and meet the same problem again. Under the water, the other wind farms' piling has been left out of the combined noise assessment, even though their construction is expected to overlap with NISA's between 2028 and 2030.

3. Fish, birds and porpoise at sea

- **Prawn and fish grounds.** The array would sit on one of the richest Dublin Bay prawn grounds in Irish waters, where the developer found burrows at every sampling site but did not count them. Herring nursery grounds overlap the array and cable route, and cod, plaice, sole, whiting and haddock spawn in the area, yet no seasonal limits are proposed on noisy work.
- **More seabed lost.** The new foundations and their rock armour nearly double the permanent loss of seabed compared with 2024, to about 0.53 square kilometres of a habitat listed internationally as threatened, and most of it would remain on the seabed after the wind farm closes.

- **Migrating birds.** Migration was surveyed in autumn only and without radar, and hundreds of songbirds heard passing at night on the developer's own recorders were left out of its collision figures.
- **Harbour porpoise.** The protected area for harbour porpoise between Rockabill and Dalkey Island runs beside the cable route. Clearing old unexploded ordnance is now the noisiest work planned, nobody yet knows how many items there are, and each large detonation is predicted to damage the hearing of several porpoises. No underwater listening survey of porpoises has been carried out. Dead porpoises were found on the Meath and Fingal shore during 2025, and while I do not say the offshore surveys caused this, it points to a population that can ill afford more disturbance.

4. Bremore: its heritage and the grid facility

Heritage. Bremore has a passage tomb cemetery, which the developer itself rates as very highly sensitive, and it is part of the chain of ancient sites along this coast that leads inland to Brú na Bóinne, alongside Bremore Castle and the Martello tower at Balbriggan. The developer accepts that, at worst, all seven areas of archaeological interest at the landfill could be disturbed and that groundworks at the grid facility could also affect archaeology. Even so, its mitigation strategy is still a draft and the remaining test trenching has been put off until after permission. That work should be done before a decision is made, because a disturbed site cannot be restored.

The grid facility. The two substation buildings would be about 17 metres high, or 20 metres to the top of their lightning rods, with 8-metre acoustic enclosures beside them, on rising ground where the roofline reaches almost 52 metres above sea level. Up to 650 homes are planned on the Flemington lands directly to the south, and the developer rates the visual effect on the nearest of them as "Major" until new planting matures. It also accepts the risk of significant construction noise there for around two years, while key measures such as the acoustic enclosures and the improved building finish are not yet guaranteed. The design, screening and noise limits should be fixed by condition, not left to later agreement.

Putting it underground. In 2024 another resident asked whether the substation buildings could be sunk into the ground. The developer's only answer is that EirGrid's specifications leave "very little room for change", and it has offered no study of whether the buildings and equipment could be placed underground or partly below ground. Substations are built underground in towns and cities in other countries to shield neighbours from their noise and appearance, and with up to 650 homes planned next door, I ask the Commission to require an independent feasibility study of this option before reaching a decision.

5. Public consultation

I attended four of the developer's walk-in events. The staff were courteous, but the events offered displays and leaflets rather than a chance to raise questions in public and hear the answers. They were held on weekday evenings, roughly from 4pm to 8pm, when many families are at their busiest. Public meetings at weekends, properly advertised in the national newspapers and on radio and TV, would have given people and their community representatives the chance to see, hear and tease out the full implications of this and other wind farm proposals. These did not take place and has resulted in a protracted planning process now awaiting a decision with An Coimisiún Pleanála.

At each “walk-in” event I asked for a public meeting in the City North Hotel, Gormanston, and each time it was refused. The developer now says it declined because the request came from “one community member” and that it responds to “representative community organisations” instead. The Gormanston Community Association is exactly such an organisation, and it formally asked for a public hearing in its 2024 submission, yet still no meeting was held. Further consultations are now promised only if permission is granted, when they could no longer affect the outcome, and I therefore renew my request for an oral hearing.

6. What I ask the Commission to do

I support offshore wind and Ireland's climate goals, but I believe this project is too large and too close to our coast and its protected sites, and that local people have not been properly heard. I respectfully ask the Commission to:

1. **Refuse permission**, for the reasons given above.
2. **Failing that, defer its decision** until the developer has assessed all five proposed Phase One wind farms together, for every protected bird species and for harbour porpoise, and the public has had a chance to respond.
3. **Hold an oral hearing** in the local area.
4. **If permission is granted, require by condition:**
 - a pause on ordnance clearance and other noisy offshore work during fish spawning, seal pupping and porpoise calving;
 - recording and post-mortem examination of porpoises washed ashore before, during and after construction;
 - new bird surveys at the landfall and along the Gormanston shore, during the breeding and nesting season and through the winter and migration periods;
 - completion of the archaeological work at Bremore and on the north side of the Delvin, to the satisfaction of the National Monuments Service of the Department of Housing, Local Government and Heritage, before construction begins, leaving the sites undisturbed wherever possible;
 - an independent study of placing the grid facility's buildings and equipment underground or partly below ground, together with fixed screening, finishes and noise limits whatever the outcome;
 - firm limits on the length of road closures on the R132.

I thank the Commission for the opportunity to make this observation on the limitations of the further information (FI).

Brendan Regan

Delvin Road, Gormanston, County Meath K32 CR29

20 October 2026