

SUBMISSION ON SIGNIFICANT FURTHER INFORMATION

North Irish Sea Array (NISA) Offshore Wind Farm An Coimisiun Pleanala Ref. ABP-319866-24

Submitted by	Richard Branagan
Capacity	Commercial Fisher and Vessel Owner - MFV Nausicaa and MFV Courageous
Address	Loughs Gate, Carnhill, Loughshinny, Skerries, Co. Dublin
Email / Telephone	Email: richard@rbprawns.net Telephone: 087 443 0203
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To An Coimisiun Pleanala,

I make this submission in response to the Significant Further Information furnished in relation to the proposed North Irish Sea Array (NISA) Offshore Wind Farm. I ask the Commission to refuse permission for the development in its present location. My concern is not opposition to renewable energy as such. It is that this project is proposed on long-established, nationally important fishing grounds, and that the practical consequences for commercial fishing have not been satisfactorily resolved.

I am a commercial fisherman and the owner of two fishing vessels, MFV Nausicaa and MFV Courageous. My business, my crews and the families who depend on these vessels rely on continued safe and workable access to the Irish Sea fishing grounds. This submission is based on direct fishing experience as well as matters raised in the applicant's own documents and in the Commission's request for further information.

1. These are established and nationally important Nephrops fishing grounds

These waters are not empty marine space. They are long-established commercial fishing grounds which have supported fishing families for generations. I first went to sea here at the age of 12 with my father. He spent his entire fishing career working these waters and nowhere else; they provided his livelihood and supported our family. I have continued fishing these grounds for decades. They are not simply part of our family history; they remain part of my present livelihood and fishing business.

The importance of the area is confirmed by NISA's own Environmental Impact Assessment. Chapter 16 identifies a highly significant Nephrops fishery in ICES rectangle 36E4. It states that Irish vessels land, on average, 1,410 tonnes of Nephrops from the commercial fisheries local study area, equivalent to 31% of Irish-vessel Nephrops landings from within the Irish EEZ. It further estimates that approximately 12% of Nephrops fishing intensity in 36E4 occurs within the array area and places the average annual first-sale value of Nephrops caught by Irish trawlers from inside the array area at approximately EUR1.55 million.

Most importantly, the EIAR itself describes the offshore development area as overlapping with nationally significant and highly important Nephrops fishing grounds. That is a critical admission. It means the question is not merely how fishermen can be mitigated after the ground is occupied, but why such important fishing ground was selected in the first place and whether the development can be located or configured elsewhere so that this conflict is avoided.

2. The fishing fleet is being squeezed from both directions

From 1 October 2026, trawling by fishing vessels over 18 metres length overall inside Ireland's six-nautical-mile zone and the baselines will be prohibited. MFV Nausicaa is approximately 19 metres and MFV Courageous is approximately 23 metres. For vessels of this size, the practical area available for trawling is therefore already restricted from the shore outward.

At the same time, NISA proposes to introduce a large area of fixed offshore infrastructure farther out. NISA's own scoping documentation states that the proposed development boundary comes as close as approximately 7.3 km from land and that the north-east corner of the site lies directly on the 12-nautical-mile foreshore area limit.

The combined effect matters. A vessel that is prevented from trawling farther inshore cannot simply be told to move shoreward if established fishing grounds farther offshore become unsafe, impractical or uneconomic because of turbines, cables and associated traffic. The planning assessment should consider the actual marine space remaining available to a working trawler after all restrictions and developments are taken together.

3. A one-kilometre corridor on a chart does not prove practical coexistence

On these grounds, prawn trawlers commonly tow broadly north-south. A normal tow can last around five hours. During that time the vessel is not simply travelling freely from one point to another: it is towing gear on the seabed, responding to tide, weather, the lie of the ground, other vessels and the behaviour of the gear.

The suggestion that approximately one-kilometre corridors between turbines permit coexistence does not answer the practical question. A five-hour tow requires usable sea room over distance. A vessel should not be expected to weave in and out around fixed structures while towing gear. Nor should fishermen be expected to shorten established tows, repeatedly alter course, change gear configuration or accept a higher navigational risk simply because a new development has been placed on an existing fishing ground.

The applicant's own material recognises that twin- and quad-rigged trawl vessels require greater operating space and may be less likely to fish close to wind-farm infrastructure. If meaningful commercial fishing can only continue by changing gear or changing normal towing practice, that is not evidence that the existing fishery has been preserved. It is evidence that the existing activity has been constrained to accommodate the new one.

I therefore ask the Commission to require evidence based on real commercial towing operations - including shooting, towing, turning, hauling, emergency manoeuvring and operation in darkness and adverse weather - rather than relying on geometric spacing alone.

4. Displacement of fishing effort is not a solution

If vessels can no longer safely or efficiently work the array area, the fishing effort does not disappear. It is displaced onto neighbouring grounds. This increases competition for a smaller area, raises the risk of gear conflict, and may place greater pressure on the grounds that remain available. It can also affect smaller vessels that do not have the range or economic capacity to relocate farther offshore.

The Commission itself specifically required the applicant to address the practicality and uncertainties of coexistence with commercial fishing and the displacement of fishing effort, including the cumulative effect of other Irish Sea Phase 1 offshore renewable projects. That concern is well founded and should be treated as a central planning issue, not a matter to be resolved later through liaison arrangements.

5. Avoidance should come before mitigation

The National Marine Planning Framework, Fisheries Policy 5, requires proposals affecting essential fish habitat to demonstrate, in order of preference, avoidance, minimisation and mitigation of significant

adverse impacts. The Commission also specifically required a revised assessment of NMPF policies and further information regarding the offshore Nephrops grounds.

In my view, the first step - avoidance - has not been given sufficient weight. Where the applicant's own EIAR accepts that the array overlaps nationally significant and highly important Nephrops grounds, the Commission should require a convincing explanation of why that ground cannot be avoided by alternative siting or a materially different design. The first obligation should be to avoid unnecessary loss or practical sterilisation of established fishing ground wherever reasonably possible.

6. Navigation, towing safety and radar require greater scrutiny

Fishing vessels operate by day and night, in poor visibility and in severe weather. A vessel towing bottom gear has restricted manoeuvrability compared with a vessel proceeding freely. Safe navigation inside or close to an array therefore cannot be assessed in the same way as a simple transit through open water.

The applicant's Navigational Risk Assessment includes marine radar as a specific risk component and categorises the residual risk as broadly acceptable. However, the Marine Survey Office raised concerns with the applicant's summarisation of navigation risk to commercial shipping, fishing vessels and recreational craft in the south-eastern area and Rockabill Gap, and the Commission required further consultation and clarification.

For a trawler engaged in a long tow, the consequences of any reduction in situational awareness, restricted manoeuvring room, turbine-related visual or radar effects, or construction or maintenance traffic are potentially serious. I ask that the safety assessment specifically address commercial trawling operations rather than general vessel transit, including night fishing, fog, heavy weather, gear problems and the need to turn or haul unexpectedly.

7. Search and rescue and emergency access

Search and rescue is not a theoretical issue for fishermen. Fishing vessels work day and night, often in poor weather and far from immediate assistance. Emergencies at sea can involve fire, flooding, collision, engine or steering failure, a fouled propeller, gear emergencies, serious injury or a person overboard. In those circumstances, rapid and unobstructed access for rescue vessels and aircraft can be critical.

The Commission's own Further Information Request records that the Irish Coast Guard, through the Department of Transport, raised concerns about the proposed layout specifically in relation to search-and-rescue access. The Marine Survey Office also disagreed with the applicant's earlier summary of navigation risk to fishing vessels and other users in parts of the site. These are serious concerns from the State bodies responsible for maritime safety and should be given substantial weight.

I note that the applicant now states that the revised turbine layout improves search-and-rescue capability. That assertion should not simply be accepted on the basis of a design drawing. The final layout should be demonstrated, to the satisfaction of the Irish Coast Guard and Marine Survey Office, to allow effective emergency access in real operating conditions, including darkness, fog, severe weather and incidents involving a fishing vessel that is disabled or still connected to fishing gear.

The Department of Transport's Maritime Navigation Safety and Emergency Response Guidance for Offshore Renewable Energy Installations is expressly intended to address navigation and emergency-response impacts throughout construction, operation and decommissioning. I therefore ask the Commission to require clear evidence on rescue-vessel access, helicopter operations, casualty approach and recovery, emergency communications, turbine shutdown procedures where required, and whether the proposed lanes provide adequate room for SAR assets to manoeuvre around a casualty inside the array.

A fisherman in distress should not face a slower, more complicated or more hazardous rescue because fixed infrastructure has been placed across a traditional fishing ground. If the development cannot demonstrate that search-and-rescue capability will be maintained to a standard acceptable to the Irish Coast Guard in all reasonably foreseeable conditions, that should weigh heavily against permission.

8. Cables, seabed protection and fishing gear

The long-term interaction between bottom-towed gear and subsea infrastructure also requires robust treatment. Export and inter-array cables may be buried, but burial conditions can change through scour and seabed movement. Where additional rock protection or remedial works are required, this may alter the seabed and create further concerns for bottom-towed gear.

Any approval should require enforceable standards for burial, inspection, monitoring, prompt remediation and clear liability where project infrastructure damages fishing gear or creates a snagging hazard. The risk and cost of monitoring project infrastructure should not be transferred to fishermen.

9. Cathodic protection and steel-hulled fishing vessels

Both of my vessels are steel working vessels. Offshore turbine foundations require corrosion protection, which may include sacrificial anodes and/or impressed-current cathodic protection depending on final design. I am not asserting that the proposed system will damage fishing vessels. I am asking that the issue be properly assessed before fishermen are encouraged to operate for prolonged periods among the structures.

If an impressed-current system or other electrical corrosion-protection system is proposed, the Commission should require a clear technical assessment of any potential stray-current or corrosion interaction with steel-hulled fishing vessels operating within the array, including whether there are any implications for hull corrosion, sacrificial anodes, maintenance requirements or vessel inspection. If the evidence shows no material risk, that should be demonstrated transparently. If uncertainty remains, it should not be left for fishermen to discover through increased repair costs or reduced vessel value after the project is built.

10. The cumulative industrialisation of this part of the Irish Sea

NISA cannot be considered in isolation. Other Phase 1 offshore wind projects, cable corridors, construction activity and associated marine traffic will place additional demands on the same sea area. The Commission has already required the cumulative assessment to consider the other Irish Sea Phase 1 projects.

There is also a proposed major port development at Gormanston Bay / Knocknagin Bay, north of Balbriggan, known as Bremore Ireland Port. In August 2026, the Maritime Area Regulatory Authority determined a Maritime Usage Licence application permitting site investigation works to inform the location and design of the proposed port. The Bremore application documents identify NISA and other offshore wind developments within the cumulative-effects scope.

I recognise that a site-investigation licence is not permission for the port itself. However, the proposal is relevant to the wider planning picture because it demonstrates the scale of additional infrastructure being considered to support offshore development along this same stretch of coast. The cumulative question for fishermen is straightforward: after wind farms, cables, associated port infrastructure, navigation routes and existing fishing restrictions are all taken into account, how much safe and economically workable fishing ground will actually remain?

11. The impact is measured in a fishing lifetime, not a short construction period

NISA's documentation anticipates an operational lifespan of approximately 35 years, in addition to construction and eventual decommissioning. For a fisherman of 47, that period extends far beyond the remainder of a normal working career. I expect to have roughly 20 years left in my own fishing career. Decisions taken now about these grounds will therefore affect every remaining year in which I can

reasonably expect to earn my living at sea, as well as the future of the crews and vessels that continue after me.

This should not be treated as a temporary inconvenience. Where access to a productive ground is materially restricted for decades, the economic and practical effect on a fishing business can be permanent.

12. Renewable energy should not needlessly displace renewable food production

I recognise the importance of developing renewable energy. However, the marine planning system is also required to consider fisheries, existing maritime activities, coastal communities and essential fish habitat. Commercial fishing is an existing food-producing industry based on a renewable natural resource. Offshore renewable energy should be developed in a manner that avoids unnecessary displacement of that industry, particularly where the developer's own evidence identifies the area as nationally significant fishing ground.

The issue is therefore not whether Ireland should develop offshore wind. The issue is whether this particular development, in this particular location, has adequately avoided conflict with one of the country's most important Nephrops fishing grounds. In my view, it has not.

13. Compensation for Losses to the Fishing Industry

My primary position remains that significant impacts on established fishing grounds should be avoided and that compensation is not a substitute for proper site selection, avoidance or mitigation. However, if permission is granted and fishermen suffer demonstrable loss as a result of the development, there must be a clear, enforceable and independently administered compensation scheme covering the full lifetime of the project, including construction, operation and decommissioning.

Compensation should apply to vessel owners and crews and should include, where demonstrated, loss of fishing opportunity or income, displacement from established fishing grounds, additional steaming time and fuel costs, increased operating costs, gear damage, downtime and any proven long-term impact on vessel maintenance or value. The scheme should recognise that losses may arise gradually and may not become fully apparent during construction alone.

Any compensation arrangement should remain open to future evidenced losses and should not require fishermen to sign away their rights in respect of impacts which emerge later in the life of the project.

14. Liability must survive sale, transfer or change of operator

The planned operating life of this development is approximately 35 years, with construction and decommissioning adding further periods of risk. During that time the wind farm, export cables, other infrastructure, project company or operating responsibilities could be sold, assigned, transferred, restructured or taken over by another company. Fishermen need certainty that changes in corporate ownership will not extinguish liability or make promised protections unenforceable.

I ask the Commission to require legally enforceable conditions and financial security ensuring that duties relating to fishing safety, cable burial and monitoring, seabed protection, gear damage, downtime, loss of fishing opportunity, compensation, repair and decommissioning remain effective for the full life of the project. They should bind any successor owner, project company and operator, without fishermen being forced to renegotiate agreements or lose existing rights. Any transfer should include clear identification of the party legally responsible, notice to affected fishermen and continuation of a workable independent claims and dispute-resolution procedure.

There should also be adequate and independently verifiable financial provision, such as insurance, security or another effective mechanism, so that legitimate claims and remedial works can be met if a project company is sold, wound up or becomes insolvent. It would be unacceptable for fishermen to bear the consequences of a change of ownership or be left pursuing a company that no longer controls the

infrastructure. These safeguards must be settled before permission is granted, rather than left to non-binding assurances or future negotiation.

15. Practical importance and economic exposure of both vessels

Both MFV Nausicaa (DA63) and MFV Courageous (DA18) operate quad-rig Nephrops trawls and have fished within the proposed array area. They generally use these local grounds between April and September, but conditions, quotas and seasonal availability can make access necessary at other times. Each vessel may have fishing gear with a value exceeding EUR 100,000 deployed during a tow. The serious financial exposure of a gear snag, including lost fishing time and a disabled vessel, must be considered alongside towing-room and cable-burial assessments. The risk is not resolved simply by showing a nominal gap between turbine positions.

These established Irish Sea grounds can be reached from Howth in approximately an hour, allowing a vessel to return for ice, gear repairs or other urgent services at Howth, Skerries or Clogherhead and resume work relatively quickly. Our normal local fishing trips are often seven to ten days. Alternative fishing grounds are not interchangeable: from Howth the Smalls is approximately 16 to 18 hours steaming each way and Porcupine Bank can take around 36 hours each way. Those fisheries are seasonal and subject to different access, quota, operational and financial constraints; they cannot be assumed to replace the nearby prawn grounds if access or practical towing there is lost.

In addition, towing routes are governed by productive Nephrops ground, the tide, existing fishing activity and the room needed to shoot, turn and haul a quad rig. Vessels working in different directions or trying to avoid fixed installations may face increased gear conflict and navigation risk. The use of established tow lines, the need to cross existing or proposed cable routes, and the cumulative effect of other displaced vessels should be tested against genuine commercial fishing practice, not simplified map drawings.

The consequences extend beyond vessel owners. Crew members depend on fishing activity for their shares and livelihoods. Permanent loss or serious restriction of these grounds could undermine the financial viability of both vessels and the continued employment they support. This is a potential business-threatening loss, not a claim that closure is inevitable. An independent assessment should consider the actual operational capability and dependence of each vessel, with vessel-level records obtained only through appropriate consent.

Conclusion and request to the Commission

For the reasons set out above, I respectfully request that permission for the proposed NISA Offshore Wind Farm be refused in its present location.

If the Commission is not minded to refuse permission outright, I ask that no approval be granted unless the applicant has first demonstrated, through independent and practical evidence, that:

- commercial trawling can be carried out safely and economically over normal multi-hour tows within and around the proposed array;
- the project will not cause unacceptable displacement of Irish fishing effort onto neighbouring grounds;
- nationally significant Nephrops grounds and essential fish habitat have been avoided to the greatest extent reasonably possible before reliance is placed on mitigation;
- navigation and radar risks have been assessed specifically for vessels actively towing gear, including night, poor visibility and emergency conditions;
- search-and-rescue access and emergency response can be maintained safely and effectively throughout construction, operation and decommissioning, to the satisfaction of the Irish Coast Guard and Marine Survey Office;

- cable burial, seabed protection and long-term inspection arrangements adequately protect fishing vessels and fishing gear;
- any cathodic protection system has been assessed for interaction with steel-hulled working vessels;
- the cumulative effects of NISA, other Irish Sea offshore wind projects, cable infrastructure and reasonably foreseeable associated port development have been assessed from the perspective of the total fishing ground that will remain available; and
- there is a clear, enforceable mechanism for ongoing monitoring, remedial action and responsibility for losses attributable to project infrastructure, including an independently administered compensation scheme for evidenced losses to vessel owners and crews.
- the assessment recognises the actual constraints of quad-rig towing, exposed fishing-gear values, tidal conditions and the seasonality and long steaming distances of proposed alternative grounds; and
- any compensation, safety, maintenance and seabed-remediation obligations remain enforceable against successor owners and operators after sale or transfer, backed by adequate financial security and an independent claims procedure.

The Commission should assess coexistence by what a fisherman can safely and economically do at sea, not simply by whether a vessel can physically pass between turbines on a chart.

Yours faithfully,

Richard Branagan
Loughs Gate, Carnhill, Loughshinny, Skerries, Co. Dublin
Telephone: 087 443 0203
Email: richard@rbprawns.net
Commercial Fisher and Vessel Owner
MFV Nausicaa / MFV Courageous

Key official documents referred to in this submission

- An Coimisiun Pleanála, North Irish Sea Array Offshore Wind Farm, ABP-319866-24 - Request for Further Information (10 April 2025), including navigation, fisheries, coexistence, displacement and cumulative-effects requirements.
- NISA Environmental Impact Assessment Report, Chapter 16: Commercial Fisheries (2024), including the assessment of the Nephrops fishery, Irish landings, VMS fishing intensity and value within the array area.
- NISA Commercial Fisheries Technical Report, Appendix 16.1 (2024), including VMS-based fishing-intensity mapping.
- Department of Transport, Maritime Navigation Safety & Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI), published 4 June 2025, together with Irish Coast Guard Search & Rescue and Emergency Response guidance.
- NISA Navigational Risk Assessment, Appendix 17.1 (2024).
- NISA EIA Scoping Report / project description material concerning the offshore development area and 12-nautical-mile foreshore limit.
- Department of Agriculture, Food and the Marine - legal restrictions on trawling by vessels over 18 metres inside the six-nautical-mile zone from 1 October 2026.
- National Marine Planning Framework - Fisheries Policy 5.
- Maritime Area Regulatory Authority, MUL240011 - Broomore Ireland Port site investigation licence, Gormanston Bay Beach / Knocknagin Bay Beach, determined 21 August 2026.

Note: This submission uses information from the applicant's published planning documents and official public bodies. Personal operational evidence and approximate steaming distances, fishing-gear values and vessel practices are provided from commercial fishing experience. Vessel-specific impacts are not presented as measured NISA-area losses without supporting landing or vessel-position records.