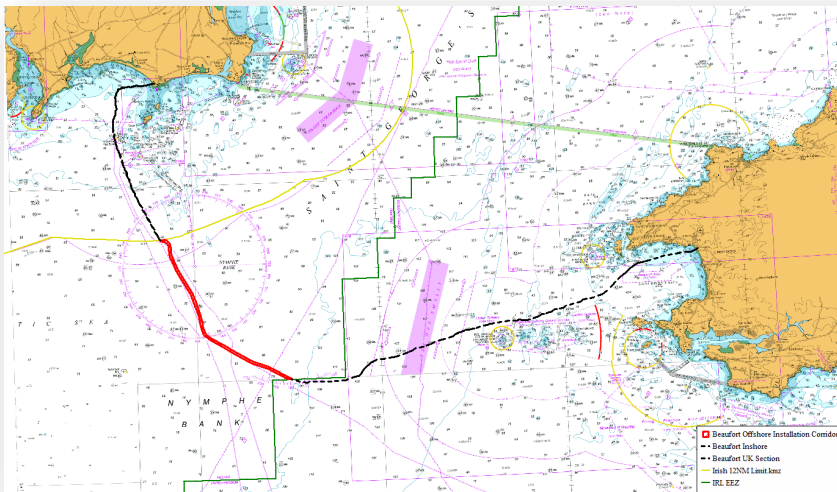


Planning Report

Planning Application for Beaufort sub-sea fibre optic cable system from the terminus of works under the granted Foreshore Licence (FS) 007361 at the 12 nautical mile (nM) limit to the extent of the Exclusive Economic Zone (EEZ)



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1.0 INTRODUCTION AND EXECUTIVE SUMMARY

1.1 Introduction

Amazon MCS Ireland Limited¹—referred to as ‘the Applicant’ throughout this report—have retained Tom Phillips + Associates, Town Planning Consultants (TPA)², McMahon Design & Management (MDM)³, and Altamar Marine and Environmental Consultants⁴ to submit this Planning Application to An Coimisiún Pleanála (‘the Commission’) for development comprising the installation of the Beaufort Sub-sea Fibre Optic Cable System from the terminus of works—granted under Foreshore Licence (FS) 007361—at the 12 nautical mile (nM) limit to the extent of the Exclusive Economic Zone (EEZ), off the coast of Kilmore Quay, Co. Wexford.

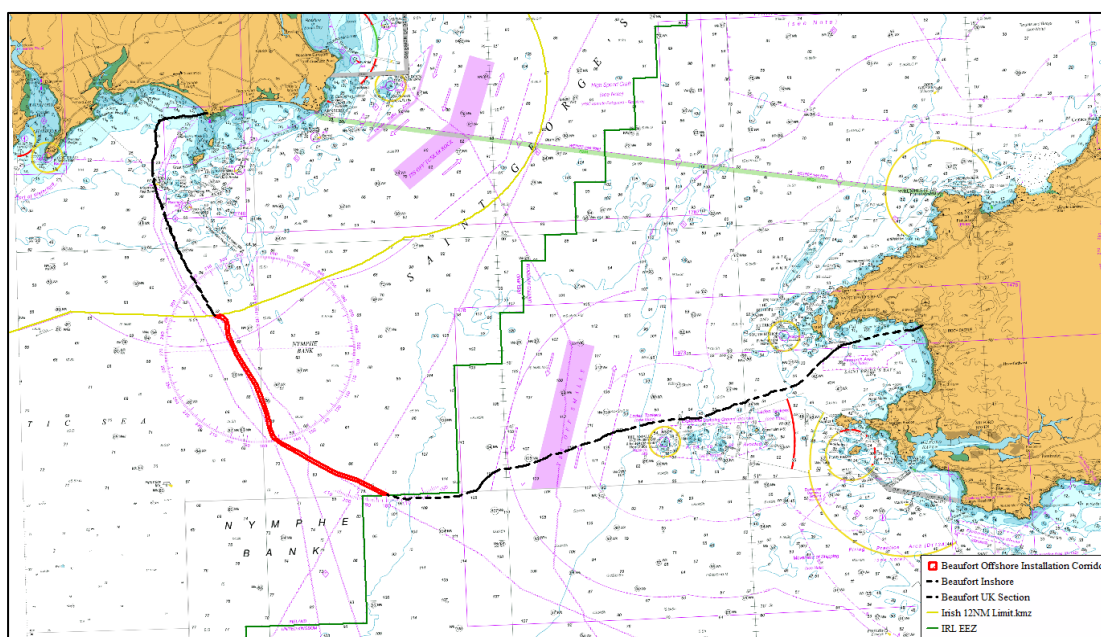


Figure 1.1: Site location map showing location of proposed development in red. (Source: Tailte Éireann; annotated by MDM).

1.2 Purpose of the project

For more than twenty years, Ireland has been connected to the United Kingdom (UK) by the ESAT-1 subsea fibre-optic cable. Installed in 1999 by ESAT Telecom (later acquired by British Telecom), the cable system has played a transformative role in reshaping Ireland’s telecommunications landscape and was the first wholly Irish private subsea cable initiative.

Subsea fibre-optic cables typically have a design life of around twenty-five years; the ESAT-1 system reached the end of its operational lifespan in 2024, not due to failure but because modern technology can now deliver significantly greater data capacity over comparable infrastructure.

As Ireland’s demand for digital bandwidth grows, replacing the ESAT-1 cable has become essential to sustaining resilient, high-capacity, international connectivity. This need is

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amplified by rapidly growing demand for secure data routes, with Ireland's digital economy already valued at €12.3bn (6% of GDP) and expected to expand further, as highlighted in the National Marine Planning Framework and EU Digital Decade strategies.

The Beaufort Cable System therefore aims to reinforce Ireland–UK subsea connectivity, introduce modern high-speed capacity, diversify international routes, and support Ireland's broader economic, social, and industrial development through a state-of-the-art fibre-optic link.

1.3 Planning of the project

In developing the Beaufort Cable System, the applicant and design team undertook an extensive, multi-stage, technical and environmental assessment process to identify the safest, most resilient, and least impactful route from Kilmore Quay to the UK. Using historic records of the ESAT-1 cable, detailed bathymetry, seabed geomorphology, sediment charts, Infomar datasets, and cross-analysis of marine archaeological, ecological, and Natura 2000 sensitivities, the team has mapped a corridor that maximises cable protection while avoiding hazards such as sand-wave fields, reef areas, wrecks, existing cables, and intense fishing grounds.

While the early intention was to follow the precursor ESAT-1 cable route, consultation with the National Parks and Wildlife Service (NPWS) resulted in the route being shifted westward to avoid the Saltee Island's SAC, leaving the historic ESAT-1 cable largely *in situ* within the protected area to avoid any potential disturbance of sensitive habitats. In parallel, the team evaluated installation methods including ploughing, jet-trenching, ROV burial, and hybrid approaches, evaluating the methods based on seabed conditions at each section of the route to ensure secure burial while minimising seabed disturbance.

Consultation with stakeholders regarding their requirements further defined the delivery of the cable. This included those of fishing fleets, harbour authorities, and maritime regulators. This evidence-based and consultation-driven process produced a final route and methodology that the Applicant and design team consider balance engineering efficiency, long-term resilience, and environmental protection.

1.4 Impacts of the project

Upon completion, the Beaufort Cable System will deliver a new high-capacity fibre-optic subsea cable, carrying up to 96 fibre pairs within a 33 mm-diameter unit capable of providing next-generation data services between Ireland and the UK. The system will reinstate a resilient connection at Kilmore Quay by utilising and upgrading the existing ESAT 1 terrestrial infrastructure (which included securing permission in June 2025 from Wexford County Council for ducting), and establishing a modern, diverse, subsea route that will enhance Ireland's connectivity to the UK and onward to continental Europe.

By providing secure and robust international bandwidth, the project directly supports national policy for strategic digital infrastructure. The National Planning Framework (2018, as revised) and the National Marine Planning Framework (2021), among other national policy documents, emphasise the importance of enhancing international fibre communications links and high-speed connectivity between Ireland and other countries and highlight the crucial role of telecommunications networks in enabling social and economic activity.

The resulting asset will form part of a critical international communications corridor, significantly improving redundancy, performance, and long-term resilience of Ireland's digital infrastructure.

1.5 Purpose of this Planning Application (permission for a specific portion of the project works)

When the project was initially conceived, no statutory regime governed development between the 12-nM boundary and the EEZ. Therefore, the only authorisation required for the offshore works was a Foreshore Licence for works extending from the mean High-Water Mark (HWM) to the 12-nM limit.

As such, a Foreshore Licence application (FS007361) was submitted in early 2022, supported by all requisite drawings and environmental assessments (including Appropriate Assessment and EIA Screening by the Minister). The Licence was granted on 29 December 2023, subject to 39 no. conditions.

On 17 July 2023, the *Maritime Area Planning Act, 2021* came into effect, creating new requirements for all works between 12-nM and the EEZ. As such, the project works now require both a Maritime Area Consent (MAC) and planning permission, on top of the Foreshore Licence, unless the works are 'exempted development' (which the Commission declared the works not to be⁵). This meant that two additional authorisations became necessary for works that previously only required a single streamlined licence.

A MAC application was lodged on 5 November 2024 with a grant of consent issued by the Minister on 26 November 2025 (a decision timeline of over a year), allowing the applicant to seek the final outstanding element of authorisation required within Irish jurisdiction i.e. planning permission from An Coimisiún Pleanála for the 12nM to EEZ development works, which are the subject of this planning application.

Under subsections (2) and (3) of section 285 of the *Planning and Development Act, 2000* (as amended), all works associated with a Foreshore Licence must be completed by 31 December 2028, otherwise planning permission becomes mandatory for those works, even if a Foreshore Licence already exists. This means that, because works between shore and 12-nM boundary cannot practically commence or be completed until the full cable system is authorised, planning permission for works between 12-nM boundary and the EEZ must be obtained promptly.

As such, the Applicant now seeks to secure planning permission as soon as possible, ensuring that all installation works (across both the Foreshore and MAP Act jurisdictions⁶) can be completed before the statutory deadline of 31 December 2028.

1.6 Preparation of this Application (incl. pre-application consultations)

In preparation of this planning application, the design team has carried out a significant amount of coordination, technical work, and engagement. The Applicant held pre-application consultation meetings (including a design flexibility meeting) with the Commission on 15

⁵ ACP Ref. 321898-25.

⁶ Aswell as the UK jurisdictions.



January 2026. At the meetings, the Commission provided helpful feedback/advice on the expected content of the prospective application.⁷

The team has reviewed, in detail, the minutes issued by the Commission on 29 January 2026 and has taken on board the Commission's feedback and advice given at the meetings in preparation of this submitted application.

The team has also shared, prior to this application's submission, the full list of documents we intended to submit, with the Commission writing back with high-level agreement of the application's contents. A detailed development description of the proposed development and a detailed methodology of works was also shared with the Commission for comment in advance of this submission. The Commission responded, on 15 April 2026, stating that it considers it appropriate to conclude the pre-application consultations.⁸ As part of this response, the Commission notified the Applicant that the Applicant is requested to send a copy of the application to 21 no. prescribed bodies and 2 no. UK bodies.⁹ (Letters to these prescribed bodies, dated 22 April 2026, have been submitted with this application.)

We have also provided the Commission, beforehand, with the Foreshore Licence and corresponding UK consenting application details to provide the Commission with the complete development context of the overall project.¹⁰

1.7 Prior Stakeholder Engagement

The applicant has been engaging directly with the local community of Kilmore Quay since 2022. This engagement has included multiple face to face meetings about the project and updates on project progress with local representatives. This engagement has included meetings with Wexford County Council, local TDs, local councillors and representatives of the Kilmore Quay Community Development Association (KQCDA). The KQCDA represents the interests of the local community and promotes community, social and economic development in the Kilmore Quay area.

Since 2022 [AWS has provided funding](#) over €125,000 to 15 separate projects in the local community and is currently in discussions with the community for further impact funding in 2026. Community groups and projects that have received funding include the Write by the Sea literary festival, Kilmore Quay Memorial Garden, Kilmore Quay Conservation group, Kilmore Parish Journal Committee, Kilmore Scout Group, Kilmore United FC, Kilmore GAA Club, Kilmore National School and Saltee Sea Safaris. Amazon has also worked with local

⁷ Immediately following the pre-planning meetings, we shared the slide deck used at the meetings for the Commission's reference.

⁸ We note that a closure letter issued on 1 April 2026 but included errors.

⁹ "The Minister for Housing, Local Government and Heritage; The Minister for the Environment, Climate and Communication; The Minister of Transport; The Minister of Defence; The Minister for Agriculture, Food and the Marine; The Environmental Protection Agency; The Maritime Area Regulatory Authority; The Minister for Rural and Community Development; The Marine Institute; Inland Fisheries Ireland; Health and Safety Authority; Commission for Regulation of Utilities".

¹⁰ (Reg. Ref. CML2606)

<https://publicregister.naturalresources.wales/Search/Results?SearchTerm=CML2606+&sortBy=Relevance&filters%5BLocation%5D=&filters%5BLocalAuthority%5D=>



secondary school Bridgetown College to provide free STEM workshops for classes via our mobile 'Think Big' space.¹¹

In 2022, a fisheries liaison officer, was appointed to liaise and meet with local foreshore users and fishermen, to explain what the project entails and to listen to and take on board any concerns raised. Engagement with the fishing community has been ongoing since 2022, throughout the foreshore licence application process, public consultation and licence determination in 2023, marine surveys in 2024, and during the ESAT1 subsea cable decommissioning operations in 2025. This engagement will continue as the project moves to the planned implementation and cable installation phase.

In the weeks leading up to this application's submission, the Applicant has endeavoured to engage all relevant stakeholders (including those not listed by the Commission in its 15 April pre-application closure letter, but which the Applicant considered relevant stakeholders to the project). These stakeholders include bodies who made observations on the preceding Foreshore License application and who are prescribed bodies, ensuring that any previous observations or concerns are anticipatorily addressed through the submitted documentation.¹²

1.8 Environmental Assessments and Policy Alignment

In parallel to the above, all environmental and technical assessments were completed, including a Natura Impact Assessment (forming part of the Natura Impact Statement (NIS) and Appropriate Assessment (AA) Screening, an Ecological Impact Assessment, an Annex IV Species Assessment, a Marine Archaeology Assessment, and an (Non-Statutory) Environmental Assessment; these assessments, and the reports they are contained within, are submitted with the subject planning application). Furthermore, the team has also prepared a Rehabilitation Plan and Schedule that outlines the required works and mitigation measures associated with the decommissioning of the cable works prior to the expiration to the Applicant's MAC (c. 20-35 years).

It is considered that the above anticipatory and preparatory work has resulted in a planning application that is complete, robust, and fully aligned with all statutory requirements. The application reflects the Commission's feedback and advice throughout the pre-application consultation process and is supported by detailed environmental assessments that scientifically predict that the proposed works will not significantly and adversely impact any Natura 2000 site, any Annex IV species, or any part of the local and wider environment.

Moreover, the proposed development is fully aligned with both National and EU policy objectives for advancing the digital economy and will result in significant long-term benefits to Ireland's digital infrastructure.

¹¹ The applicant believes in building stronger communities by supporting meaningful, long-term initiatives that create opportunities and drive positive change. Whether leveraging technology to address critical global challenges, providing resources to underserved communities, or empowering future builders through education, its goal is to make a lasting impact in the places we call home. The applicant works closely with local organisations, nonprofits, and community members to understand their needs and find ways to contribute in a way that is both thoughtful and impactful. By listening, learning, and collaborating, we strive to be a good neighbour and an active partner in fostering thriving, resilient communities.

¹² The Applicant has not received any response from these stakeholders as of writing this report.



As such, we make this application in the expectation that its completeness will facilitate a timely determination, without the need for requests for further information, allowing the project to proceed in time to meet the statutory deadline of 31 December 2028.

1.9 Structure of this Report

This Planning Report is structured as follows:

- Section 1.0 includes an introduction and executive summary.
- Section 2.0 describes the site location and development context.
- Section 3.0 outlines the relevant planning history.
- Section 4.0 describes the proposed development, including method of works and ecological mitigation measures proposed.
- Section 5.0 assesses the proposed development.
- Section 6.0 sets out a review of the relevant planning policy context.
- Section 7.0 lists the documents submitted.
- Section 8.0 concludes the planning report.

2.0 SITE LOCATION AND CONTEXT

The overall site is approximately 38.5km in length (equating to an overall site area of approximately 1,538 ha when calculating the eventual development area of the cable on the seabed floor (same as the MAC) from 12 nautical mile (nM) limit to the extent of the Exclusive Economic Zone (EEZ) in the Celtic Sea.

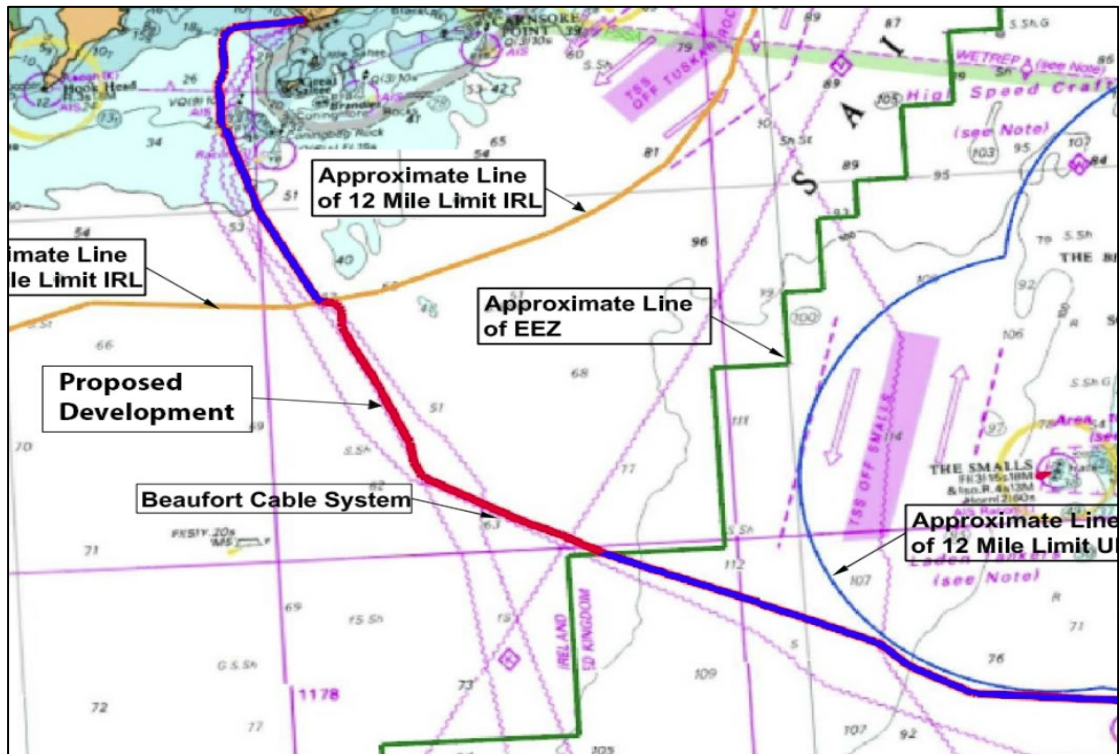


Figure 2.1: Proposed Development extent (shown as red Line) from 12 nM Limit (shown as yellow line) to extent of the EEZ (shown as green line). (Source: MDM, DWG 1354-A-104 Rev. 0 Overall Route Map, March 2022).

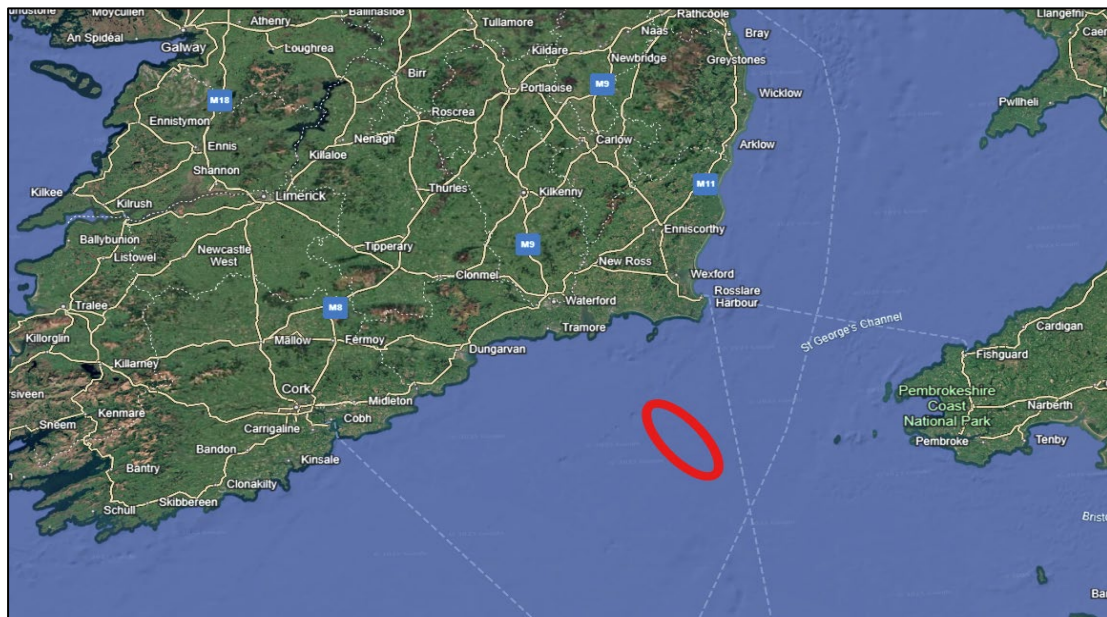


Figure 2.2: Approximate location of proposed development (shown as red oval) in wider geographical context. (Source: Google Earth; annotated by TPA).

3.0 AUTHORISATION/CONSENT HISTORY

3.1 Foreshore License Ref. FS007361

Authorisation in the form of a Foreshore License was secured on 19 December 2023, with 39 no. conditions attached, for development described as follows:

‘The installation of the Beaufort sub-sea fibre optic cable system from a landfall in Kilmore Quay, Wexford to the Ireland 12 nM limit’.

The authorised development’s site plan shown in Figure 2.3, below.

To date, no other authorisations or consents have been sought by our client. This is because prior to the establishment of the MAP Act in 2023, we understand that no authorisation or consent was required for any development beyond the 12 nM limit and the development did not require planning permission per s. 225 of the 2000 Act.

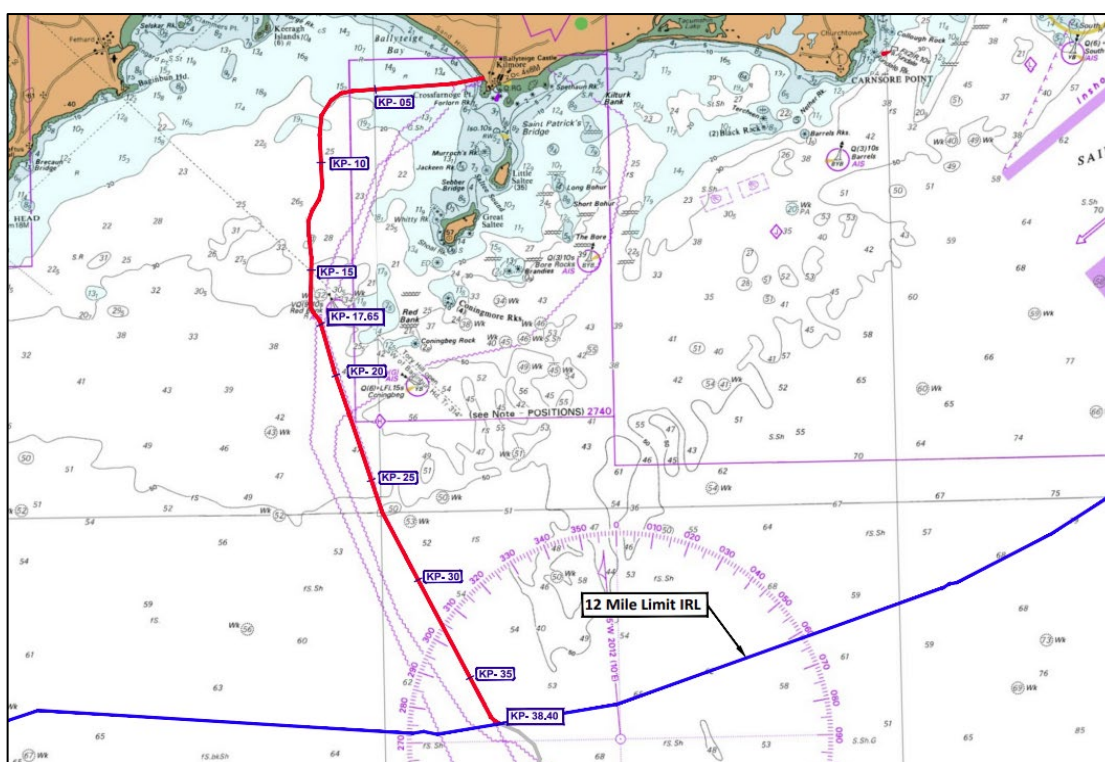


Figure 3.1: Authorised development (shown as red line) from onshore in Wexford (shown in yellow) to the extent of the 12 nM limit (shown as blue line)(Source: MDM, DWG 1354-A-103 Rev. 2 Route to 12 Mile Limit Ref. FS007361, May 2023).

3.2 Section 5 Referral declaring not exempted development

Tom Phillips + Associates on behalf of the client made a s. 5 referral directly to An Coimisiún Pleanála, on 29 January 2025, under s. 314 of the 2000 Act, requesting determination on whether the proposed development is exempted development.

The Commission, on 30 April 2025, made a decision that the proposed development is development that is not exempted development.

As such, we now seek permission from the Commission.

3.3 MAC Application/Consent

Amazon MCS Ireland Ltd. applied to the Maritime Area Regulatory Authority (MARA) on the 5 November 2024 for a Marine Area Consent (MAC) in relation to the installation of the Beaufort telecommunications fibre optic cable connecting Kilmore Quay, Wexford to Pembrokeshire, Wales from the end of the existing foreshore licence to the boundary of the EEZ (Ref. MAC 240030).

The MAC application was validated for completeness by the MARA on the 10 January 2025 and was subsequently issued on 26 November 2025. This MAC consent allowed the applicant to hold s. 287 pre-planning meetings with the Commission. These meetings were held on 15 January 2026.

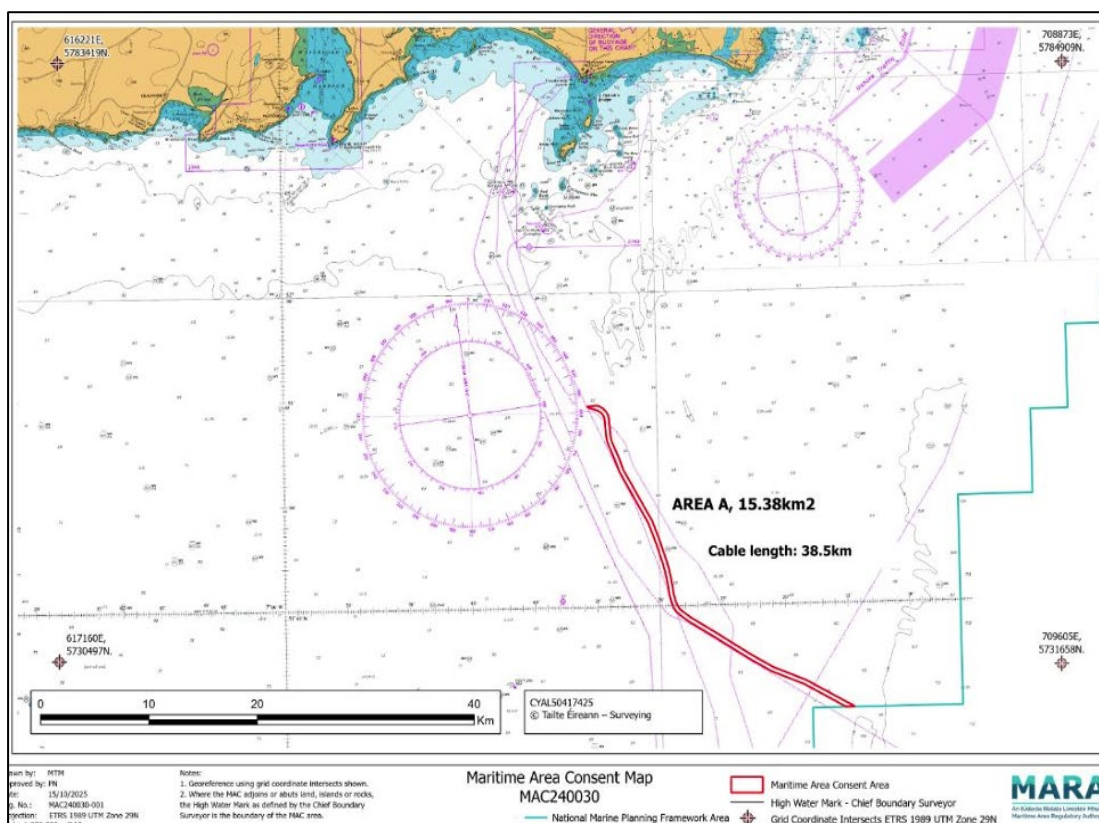


Figure 3.2: MAC red line boundary, prepared by MARA and contained within MAC.

3.4 Planning Application/Permission for Onshore Works at Kilmore Quay Beach

A planning application was submitted, in March 2025, for works extending from the HWM at Kilmore Quay Beach to the existing infrastructure located behind the dune (Ref. 20250330). Permission was required due to dune erosion, which had exposed existing cable infrastructure and prevented the screening out of a Natura Impact Statement.

A full Appropriate Assessment was carried out. Wexford County Council granted permission on 11 June 2025. The permitted works will support the Beaufort Cable System once it makes landfall at Kilmore Quay.

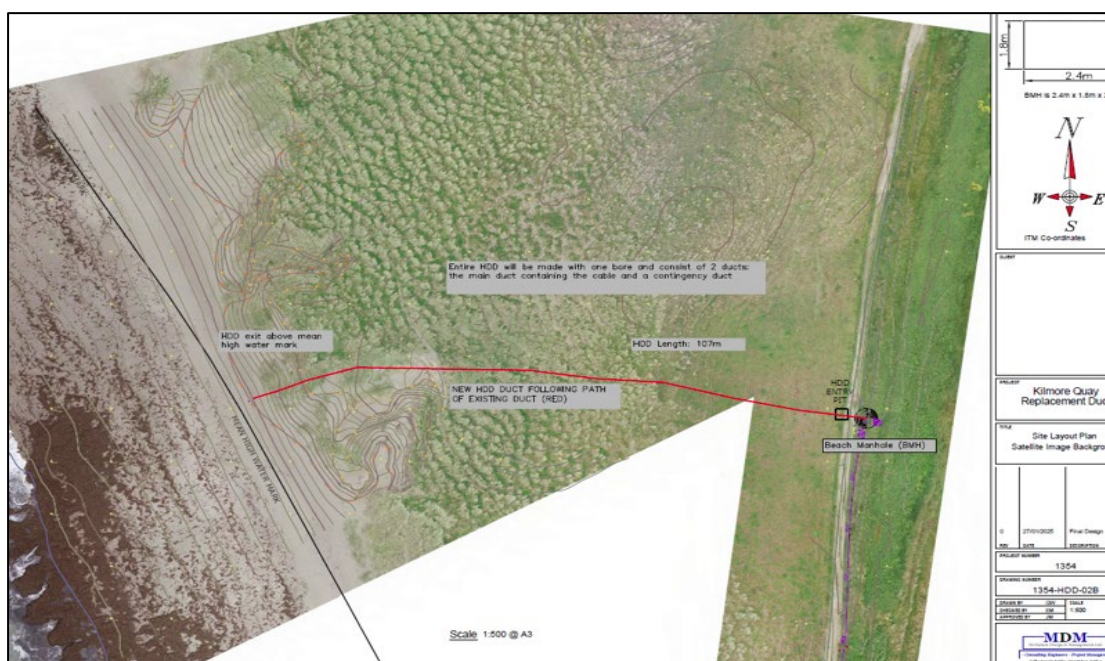


Figure 3.3: Onshore works permitted by Wexford County Council in June 2025.

3.5 UK Consent Application

An application for the development associated with the project was submitted to National Resources Wales in March 2026. We understand that it will take approximately 16 weeks for a decision to be made on that application. This, along with the subject application, is the final piece of development consent required for the project.

We have also provided the Commission, beforehand, with the corresponding UK consenting application details to provide the Commission with the complete development context of the overall project.¹³

4.0 PROPOSED DEVELOPMENT

4.1 Development Description

Amazon MCS Ireland Limited intends to apply for planning permission for a development off the southeast coast of Ireland comprising the installation of the Beaufort sub-sea fibre optic cable system from the terminus of works under the granted Foreshore Licence (FS) 007361 at the 12 nautical mile (nM) limit to the extent of the Exclusive Economic Zone (EEZ) and will have an operational life of 35 years.

¹³ (Reg. Ref. CML2606)

<https://publicregister.naturalresources.wales/Search/Results?SearchTerm=CML2606+&sortBy=Relevance&filters%5BLocation%5D=&filters%5BLocalAuthority%5D=>

The development includes the installation of cable protection on the seabed to provide at 1 no. location at which the proposed Beaufort cable crosses the existing 'Greenlink' Interconnector cable. The development also includes flexibility in respect the finished cable route (the application includes a proposed buffer width of 400 metres matching the Maritime Area Consent boundary within which the cable can be laid).

The application includes a detailed rehabilitation plan and construction environmental management plan.

The applicant is the holder of a Maritime Area Consent (Ref. MAC240030) granted for the occupation of the subject maritime area for the construction of a sub-sea fibre optic cable system.

A Natura Impact Statement (NIS) has been prepared and is submitted in respect of the proposed development.

4.2 Method of Works

The principal objective of the main lay installation works is to successfully deploy the fibre optic cable along the proposed route, obtaining the required burial depth to protect the system from external aggression and provide for a safe and secure system, with due regard for environmental, archaeological, and ecological considerations.

The Main Lay vessel will pick up the end of the cable from the Inshore Section (i.e. Kilmore Quay to Irish 12nm Limit) at the 15-metre water depth and this will then be jointed to the main cable on board the Main Lay Vessel. (The jointing process takes approximately 18-24 hours to complete, including tests of the cable system.) The Main Lay Vessel will then proceed to deploy and bury the cable in the seabed. The burial tool is operated from and powered by the Main Lay Vessel and is designed to bury the cable at a depth such that the cable will be secure from fishing activities. The target burial depth of 1.5m is subject to reasonable endeavours and where the seabed geology allows.

Typical burial speed is generally of the order of 0.5 knots and is dependent on the stiffness of the seabed sediment. There is no significant noise generation during burial operations. Cable installation produces only a minor plume of suspension of seabed sediments in the water column, and this is transient and localised due to the nature of the burial and natural backfill activities.

Typical subsea cable burial tools used to simultaneously install and bury fibre optic cables in the seabed include cable plough (passive and jet assisted) or jetting trenchers (sled or self-propelled). The Nexans CAPJET jetting trencher will be deployed for the installation of the Beaufort cable system.



Figure 4.1: Nexans CAPJET Burial Tool.

The Nexans CAPJET system is a remotely operated jetting trencher developed to bury subsea cables and pipelines into the seabed. It uses high-pressure focussed water jets to fluidize the sediment beneath the cable or pipeline, allowing it to settle into a trench without mechanical cutting. The CAPJET is capable of:

- Trenching to depths of up to 3 m, depending on soil conditions.
- Operating in waters up to 2,000 m deep.
- Performing in a variety of seabed types, from soft sediment to harder soils, with adjustable jet pressure (10–16 bar) and thrust.

It integrates multiple sensors (video cameras, sonar, gyros, pressure sensors) for precise control and real-time monitoring. The system's modular design enables different trenching configurations — for flexible pipelines, steel flowlines, and cable burial.

In the context of this project the CAPJET will be used to simultaneously lay and bury the Beaufort cable by forming a narrow trench (approx. 150mm) of fluidised seabed using a bespoke jetting sword into which the cable is installed to the target depth through the cable depressor. The seabed sediment is displaced temporarily to form the trench during the burial operation and then allowed to re-form naturally and 'backfill' the trench after the passage of the jetting tool. The CAPJET will be powered and controlled from the cable installation vessel via electrical umbilical. A visual representation of the CAPJET system is shown in Figure 11.

The target burial depth for the Beaufort cable system is 1.5 metres. In areas of stiff soil, the actual burial depth may be reduced but is planned to be still at a depth which will protect the cable from fishing operations and generally not less than 1 metre. Where seabed geology prevents burial such as areas of rock or reef, the cable will be directly laid on the seabed surface.

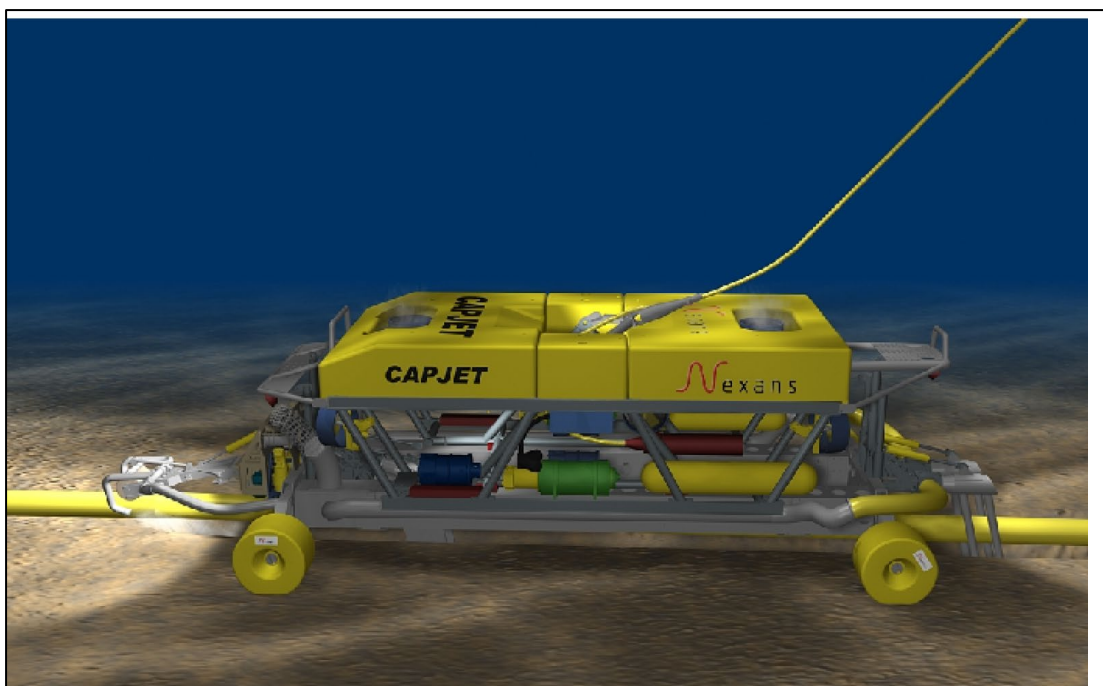


Figure 4.2: Nexans CAPJET Burial Tool.

Regular inspections will be carried out every three months but will also remain on a responsive basis as needed upon notification if the original ducts become exposed. As part of this maintenance, any cut-back sections will be securely capped to prevent any sharp cable or plastic ducts ends from being exposed or concealed by sand, ensuring both safety and environmental protection.

4.3 Design Flexibility

As part of the s. 287B pre-planning meeting, on 15 January 2026, on design flexibility, two details were presented to the Commission for which the applicant believed they needed flexibility on:

- Cable route corridor.
- Cable laying technology.

At the meeting, the Commission indicated that the requests appeared reasonable. However, it also noted that “cable-laying technology” may not constitute a design detail and might instead be considered a construction method. As such, the Commission stated that it may not be in a position to confirm design flexibility in respect of the cable-laying technology. Nevertheless, the Commission acknowledged that construction methods inherently allow for a reasonable degree of flexibility on which developers may rely, and that cable-laying technology may fall within this inherent flexibility.

On 15 April 2026, the Commission issued a letter to the Applicant confirming the closure of the pre-planning consultations. The letter also confirmed that the proposed cable route can include flexibility in respect of the alignment of the cable route within an established corridor. The letter did not state what the width of this corridor is; however, the applicant proposes a corridor of 400 m wide in diameter. The commission also confirmed that cable laying technology does not constitute a design detail and that options related to construction



practice can be agreed prior to commencement of development, by way of compliance, so as the options as assessed in the application document.

We can confirm that the flexibility sought in respect of the design details (i.e. cable route) have been fully assessed in the application document including the Natura Impact Assessment and the cable laying technologies are identified in the Construction Environmental Management Plan and Methodology of Works.

4.4 Ecological Mitigation Measures

Contained within the AA Screening and NIS Report prepared by Altemar and the Construction and Environmental Management Plan, prepared by MDM, are mitigation measures designed to guide the proposed works in a manner eliminating any adverse impacts that may occur during construction and operation to the SAC and wider environment. We provide an overview of the proposed mitigation measures. Please see the above-referenced documents for detailed description of the mitigation measures proposed; we provide a summary list of the measures below:

Mitigation Measures	
1	During all cable operations within Irish waters, the cable lay vessel will be operating at idle /minimal wake speeds which reduces potential collision risk with marine mammals. Plough operations will typically not exceed 0.5kn.
2	A certified Marine Mammal Observer (MMO) will be on board the vessel at all times in Irish waters to implement standard NPWS marine mammal mitigation measures. “Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters” (NPWS, 2014) will be applied to ensure noise introduced into the marine environment have minimum effect. Plough launch, seabed ploughing and plough recoveries will be conducted in consultation with the MMO.
3	Mitigation measures will include the presence of a MMO onboard the vessel. The purpose of the MMO is to ensure that there is no disturbance of seal /cetacean or other Annex IV species e.g. marine turtles, to ensure that project anthropogenic noise is minimised.
4	In line with “Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters” (NPWS, 2014) “Sound-producing activities shall only commence in daylight hours where effective visual monitoring, as performed and determined by the MMO, has been achieved. Where effective visual monitoring, as determined by the MMO, is not possible the sound-producing activities shall be postponed until effective visual monitoring is possible” and “in waters up to 200m deep, the MMO shall conduct pre-start-up constant effort monitoring at least 30 minutes before the sound-producing activity is due to commence. Sound-producing activity shall not commence until at least 30 minutes have elapsed with no marine mammals detected within the Monitored Zone by the MMO”.
5	A project ecologist (separate to the MMO) with sufficient ornithological expertise in the identification of diving seabirds will be onboard. Where the ecologist observes a significant cluster of actively diving birds in the works corridor, within 500 m of the vessel works will be mitigated based on the instruction of the ecologist. This could



	include slowing vessel cable laying or pausing works if there is potential for significant effect on birds.
6	Sufficient resources will be made immediately available on the vessel to deal with accidental oil spills, including hydraulic hoses bursting etc. and reported to the on-board ecologist. Ballast water discharges from project vessels will be managed under the International Convention for the Control and Management of Ships' Ballast Water and Sediments standard (International Maritime Law: Ballast Water Management Convention).

5.0 PLANNING ASSESSMENT

5.1 Overview of key planning considerations

Route

From the 12nm limit, the Beaufort route follows the line of ESAT-1 to KP 60.0. At this point it changes course and diverges from the route of ESAT-1 to follow a more south easterly course. The proposed route then crosses the EEZ and exits Irish territorial waters at KP 78.1. As the route traverses the Irish EEZ waters beyond the 12 nM Limit the water depths increase gradually from 52 metres to 90 metres at the EEZ boundary.

A key element in planning the overall route system is the availability of seabed conditions which facilitate the installation of a cable, and which will provide stability and security of the cable over its lifespan. A British Geological Survey Seabed Sediment Chart, with the northern section of the overall route system shown on it. The entire offshore section of the Beaufort Cable between the Irish 12 nM limit and the Irish EEZ traverses sandy seabed.

As outlined in section 4.3 above, the Commission has given flexibility for the laying of the cable of 400 metres either side of the illustrated cable line. These potential deviations have been included within each environmental assessment included within this planning application.

The respective environmental assessment reports submitted with this planning application conclude that a strict route selection process was carried out to assess the optimal route which took into account the lowest environmental impact and highest resource efficiency. No issues are foreseen for the final cable route and installation methodology proposed.

Cable installation

Cable installation follows a carefully sequenced offshore construction process designed to ensure technical accuracy, environmental protection, and long-term operational resilience.

The Main Lay vessel will pick up the end of the cable from the *Inshore Section* at the 15-metre water depth and this will then be jointed to the main cable on board the Main Lay Vessel. The jointing process takes approximately 18-24 hours to complete, including tests of the cable system. The Main Lay Vessel will then proceed to deploy and bury the cable in the seabed. The burial tool is operated from and powered by the Main Lay Vessel and is designed to bury

the cable at a depth such that the cable will be secure from fishing activities. The target burial depth of 1.5m is subject to reasonable endeavours and where the seabed geology allows.

Dynamic Positioning systems maintain precise vessel alignment throughout operations, ensuring the cable is laid exactly along the approved corridor. Cable tension, speed, and touchdown monitoring are continuously controlled to avoid over-bending or damaging the fibre core. Burial depth is tracked and verified in real time to ensure the required 1.5m target depth is met wherever feasible. At crossing points or stiff seabed areas, installation is adapted with protective measures or delayed burial strategies. The entire process is documented through as-laid surveys, forming the final operational record for the system.

The respective environmental assessment reports submitted with this planning application conclude that due to the very temporary and localised nature of the cable installation process, and subject to mitigation measures, the operations are not likely to cause any significant adverse impacts.

Cable crossings

Cable crossings are managed through a structured engineering process that begins with high-resolution geophysical surveys to map all existing telecoms, power, and legacy cables along the route. The proposed route comprises a total of 4 subsea crossings of existing in-service telecoms cables and an electrical interconnector:

Name	Type	Position	Water Depth	Latitude	Longitude
UK-IRL Crossing 1	Telecom	KP 41.9	55m	51° 53' 45.5170" N	6° 34' 01.9208" W
Greenlink Interconnector	Electrical Interconnector	KP 58.8	60m	51° 45' 20.6984" N	6° 29' 02.1085" W
UK-IRL Crossing 1	Telecom	KP 65.8	66m	51° 43' 04.2921" N	6° 24' 24.1696" W
Hibernia Atlantic	Telecom	KP 74.4	76m	51° 40' 59.1939" N	6° 17' 47.6817" W

Table 1: Cable Crossings.

The concrete mattress required for the *Interconnector* crossing will be loaded onto the Offshore Construction Vessel at the port of mobilisation. A pre-installation inspection will be undertaken at the crossing location including confirmation of crossing positioning and burial depth. The concrete mattress will be installed on the seabed using the vessel crane and a mattress installation frame with touchdown monitoring. The installation location will also be verified via beacons mounted on the installation frame. The mattress installation frame slings will be released, and the frame recovered to the deck.

The respective environmental assessment reports submitted with this planning application conclude that the proposed Beaufort cable laying methodology has been designed to prevent any potential in-combination effects with existing subtidal cables within the Irish EEZ.

Ecology

The proposed development is not anticipated to result in any significant adverse impacts on the conservation of any protected species or their natural habitats.

As per section 9.0 of the EclA, the overall impact of the ecology of the proposed works will have a short term/minor/not significant residual effect on the ecology of the area and locality overall.

Consequently, the proposed development complies with the Habitats Directive and the requirements of the Biodiversity Policies of the NMPF.

Archaeology

Archaeological considerations are embedded throughout project design, beginning with a comprehensive desktop study and marine archaeological assessment of the entire corridor.

All identified targets have been mapped and classified and will be avoided through micro-routing where feasible. Protocols will be in place to halt operations and notify authorities if unexpected archaeological material is encountered.

Monitoring will be in place throughout decommissioning works, particularly where the old cable is lifted from the seabed. A final Archaeological Monitoring Report will be submitted to the relevant statutory bodies, documenting all findings and confirming compliance with best practice.

The respective environmental assessment reports submitted with this planning application conclude that there are no known wrecks within 100m of the final Beaufort cable route. However, a residual potential remains for impacts on previously unidentified archaeological material.

As stated, mitigation measures are in place to avoid any impacts. Therefore, the cable installation works have no impact on known archaeological sites.

Vessel Management

Vessel management for the Beaufort Cable System is delivered through a rigorously coordinated marine operations plan that prioritises safety, environmental compliance and efficient offshore execution. The main-lay works will be undertaken by the Cecon CLV, a purpose-built 100-metre cable-lay vessel with accommodation for up to 100 personnel, full Dynamic Positioning, AIS broadcasting and endurance for continuous 24-hour operations.

See the accompanying CEMP and Works Methodology for further detail on vessel management.

The respective environmental assessment reports submitted with this planning application conclude that the vessel will not create any additional noise or local disturbance. The vessel will not pose any significant risk or impacts due to the temporary nature during construction phase.

Post lay operations

Following installation, the cable undergoes post-lay inspection to confirm burial depth and integrity. Any surface-laid or under-buried sections are corrected through targeted post-lay burial operations. Joint locations and splice points will receive additional verification and protection.

All seabed disturbance will be minimised through localised, low-impact jetting techniques.

See the accompanying CEMP and Works Methodology for further detail on post-lay operations.

The respective environmental assessment reports submitted with this planning application conclude that post-lay inspection and burial may be carried out to ensure proper laying of the cable in the seabed. The operations will not introduce anything alien to the environment, using surrounding seawater for the jetting system. The temporarily displaced seabed will naturally reform after the passage of the CAPJET's burial tool.

Rehabilitation and Decommissioning

Fibre optic cables become redundant typically after 20 to 25 years of service but can be longer depending on technological advances in fibre optic communication systems. At such a time, the cable will be taken 'out of service' and decommissioned partially or in full.

The final decision on the extents of the cable removal will be taken in conjunction with the relevant authorities at the time of decommissioning and in accordance with industry and environmental best practices at the time.

The decommissioning works will involve disturbance of the upper layers of the seabed in order to remove the cable. In the case that the cable cannot be removed from the seabed at any location it will be cut and the cable ends secured on the seabed using clump weights following standard cable industry practices.

Both scenarios (i.e. Scenario 1, involving full removal of the cable, and Scenario 2, where the full length of the cable is left *in situ*) have been fully assessed within the submitted environmental reports. Accordingly, the assessments capture both scenarios occurring (i.e. the unlikely extremes). The most likely scenario will be similar to the extant ESAT-1 cable, where some portions of the cable have been removed and some portions retained.

The respective environmental assessment reports submitted with this planning application conclude that the impacts within a decommissioning stage are similar to those of the cable laying phase. Overall, any works required will be minor and isolated in nature.

Please note that the submitted Rehabilitation Plan and Schedules encompass the entire project in Ireland as ultimately that is how it will be practically addressed. However, we note that for the purposes of this planning application, the decommissioning and rehabilitation works assessed by the design team, and by ACP, will be those works within the redline application boundary.

Cumulative impacts

All works relating to the laying of the Beaufort cable from the HWM to 12 nM, including trenching on the lower beach, have been authorised by the Minister for Housing, Local Government and Heritage through the existing Foreshore Licence issued on 19 December 2023 (Ref. FS007361).

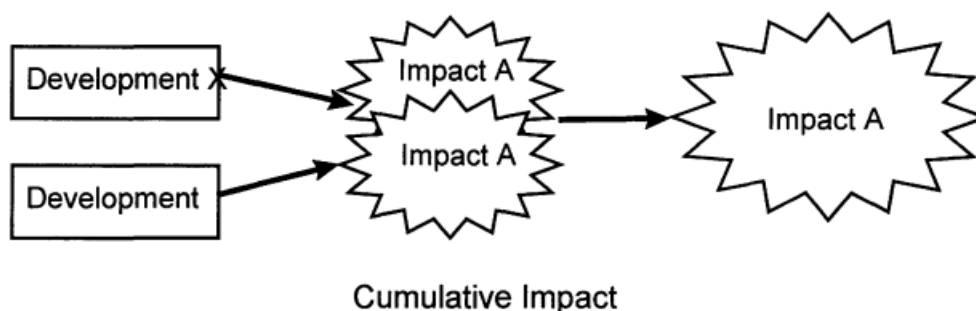


Figure 5.1: Definition of cumulative impacts in the EU Commission's *Assessment of indirect and cumulative impacts as well as impact interactions. Volume 3: Guidelines, 2000.*

That development was subject to its own environmental assessments, including a Natura Impact Assessment¹⁴, which found that no significant or adverse impacts are likely to arise as a result of that development.

Regarding cumulative impacts of the consented cable works with the proposed development, no new significant impacts are likely to arise as a result of the combination of both projects.

The respective environmental assessment reports submitted with this planning application conclude that the applicant is aware of proposals for renewable energy development sites and associated marine survey in the Celtic Sea, which have been cumulatively assessed within this application. Out of an abundance of caution, there is potential for in-combination effects with the UK element of the Beaufort subsea cable. However, mitigation measures are required to prevent in-combination effects. Therefore, there are no likely significant impacts in regard to cumulative impacts.

For further detail please see the accompanying Construction Environmental Management Plan and Natura Impact Statement prepared by MDM and Altemar, respectively.

Transboundary impacts

We note that the proposed development relates to a subsea telecommunications cable located off the southeast coast of Ireland and situated entirely within Irish territorial waters. While it is acknowledged that the overall project as a whole connects to Newgale in Wales, containing elements within territorial waters of the UK, those elements are subject to a separate and distinct consenting process under the relevant UK regulatory regimes.

Having regard to the nature, scale, and location of the development of this application, significant transboundary effects are not likely to arise during the construction, operation, or

¹⁴Assessments of the Beaufort Sub-sea Fibre Optic Cable System development between landfall and 12 nM in Irish jurisdiction can be found at: <https://www.gov.ie/en/foreshore-notice/73943-fs007361-beaufort-sub-sea-fibre-optic-cable-system/>

decommissioning phases. Notification of the application will be subsequently issued to the United Kingdom Department for Levelling Up, Housing and Communities and to the Welsh Government Energy Policy team in accordance with the direction issued by An Coimisiún Pleanála on 15th April 2026.

5.2 EIA

Having regard to EIA Directive 2011/92/EU as amended by Directive 2014/52/EU (“the EIA Directive”), and on the basis of the objective information provided in this application, it is considered that the proposed subsea cable installation and decommissioning/rehabilitation works do not fall within a mandatory category for EIA. As such, an EIAR can be screened out as being required as part of this planning application due to the location and nature of the receiving environment and the unlikelihood of possible significant impacts arising, having regard to the nature, size, and location of the proposed development as per the assessment criteria outlined in section 103(1)(a) of the Planning and Development Regulations, 2001 (as amended).

Notwithstanding, a non-statutory environmental assessment has been carried out in respect of the proposed development. It concludes that no significant impacts are likely to arise as a result of the proposed development. This environmental assessment considered the impacts in combination with all relevant permitted and proposed projects.

We note that EIA was also screened out by the Minister as part of the Foreshore Licence application for the Inshore Works.

5.3 Appropriate Assessment

A Natura Impact Statement (NIS) is submitted with this planning application confirming that with the implantation of mitigation measures it is predicted there will be no adverse impacts on any Natura 2000 sites or their objectives.

Altamar has taken a precautionary approach and has undertaken a Natura Impact Assessment in support of the AA process.

For further detail, please see the AA screening & NIS reports, prepared by Altamar and accompanying this planning application. We note that ACP will complete an AA in its assessment of the proposed development.

6.0 PLANNING POLICY CONTEXT (SEE APPENDIX C FOR A RESPONSE MATRIX TO EACH POLICY OBJECTIVE OF THE NMPF)

We have undertaken a review of national and local planning policy, relevant to the site, which has revealed that the proposed works are supported, by significant national and local planning policy. We have assessed the scheme against the following national planning policy:

- National Planning Framework.
- National Marine Planning Framework.

- Marine Planning Policy Statement 2019.
- Climate Action Plan 2025.
- Regional Spatial Economic Strategy for the Southern Region 2019.
- The South Coast Designated Maritime Area Plan for Offshore Renewable Energy (SC D-MAP).

We have also assessed the scheme against the following local policy:

- Wexford County Development Plan 2022 – 2028.

Please see an assessment against each, below.

6.1 National Planning Framework, 2018

The National Planning framework, 2018, states that it is an ambition to:

“Enhanc[e] international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.”

And that:

“In the information age, telecommunications networks play a crucial role in enabling social and economic activity.”

In our professional town planning opinion, the proposed development is fully aligned with the NPF.

6.2 National Marine Planning Framework, 2021

Mr. Michael Martin’s Taoiseach Foreword states that the “overall objective” of the National Marine Planning Framework, 2021, is to “regulate development and activity in our Maritime Area” (Pg. 4).

Telecommunications

Regarding telecommunications, the Framework states that:

“Guaranteeing existing and future international telecommunications connectivity is critically important to support the future needs of society and enterprise in Ireland. The value of the digital economy is estimated at €12.3bn or 6% of GDP and is expected to grow significantly. A robust and coherent marine planning system will encourage and support future investment in high-speed submarine telecommunication infrastructure.”

*As **telecommunications services increasingly underpin economic and social activity across a whole range of sectors, connectivity through domestic and international cables can indirectly impact upon many of the sectors in the plan.***” (Pg. 176).

[Our emphasis.]

It is explicit that telecommunications developments must be encouraged and supported as they are a significant, increasing, portion of the Irish economy, and additionally serve to support other sectors. It is considered that this policy was included for the purposes of encouraging development of telecommunications infrastructure both for economic and social benefit.

Seascape and Landscape

Regarding seascape and landscape, the Framework states that:

*“Many areas of our coastline are distinctive for their natural beauty and their diverse range of activities. This policy aims to **make sure that proposals consider their potential impacts on the seascape and landscape of an area.** This is not only important for the protection of iconic views and character but also to aid in the process of enabling development where it is most appropriate.”* (Pg. 97).

[Our emphasis.]

This policy emphasises the criticality of consideration for potential impacts on the seascape and adjacent coastal landscapes. It is considered that this policy was included for the purposes of informing development, where mitigation measures must be instituted for any level of such, to preserve the overall character of both areas.

While this policy does not directly encourage development in these areas, it does encourage development in the right areas, subject to sufficiently thorough mitigation measures being implemented for a proposal. The proposed development has been anticipatorily designed so that the cable can be laid through the least environmental sensitive areas, such as the avoidance of Natura 2000 sites and sensitive seabed geographies.

In conclusion, at a national level, government policy strongly supports the continued operation and enhancement of telecommunications links and networks in Ireland and from Ireland internationally, subject to effective mitigation measures being in place. The submitted NIS confirmed that, subject to mitigation, no adverse impacts are likely to arise on any protected sites or their objectives, and the non-statutory environmental assessment concludes that no significant negative impacts will arise on the environment, generally. We note that the Commission, at the s. 287 pre planning meeting, advised the design team to include a matrix of all policy objectives contained within the NMPF and provide commentary on the proposal compliance with all relevant objectives. This matrix is contained within Appendix C of this Planning Report.

6.3 Marine Planning Policy Statement (MPPS)

The MPPS outlines the Government’s vision for a plan-led, integrated marine planning system based on the principle of sustainable use. The statement identifies international connectivity

as a strategic priority, noting that Ireland's geographical position requires robust links to the UK and Europe.

The cable project is inherently compliant with the MPPS because it follows the prescribed "Forward Planning" and "Development Management" hierarchy, requiring a Maritime Area Consent (MAC) and adherence to the National Marine Planning Framework. By facilitating secure, high-capacity, communications, the project supports the "thriving maritime economy" goal without compromising "Good Environmental Status," as the installation process is temporary and the footprint on the seabed is minimal (pg. 2, 8-9).

6.4 Climate Action Plan 2025 (CAP25)

CAP25 sets out the roadmap for Ireland to achieve a 51% reduction in emissions by 2030, emphasising the "turbocharging" of delivery across all sectors. While subsea cables are primarily digital infrastructure, they are essential to a climate-neutral economy by enabling the high-tech, low-carbon, services that reduce the need for physical travel.

The project is compliant with CAP25's "Just Transition" and "Research and Innovation" themes, as it supports the digital backbone required for monitoring offshore energy grids and coordinating smart-grid electricity demands. Because the project will be subject to Appropriate Assessment (AA) and Environmental Impact Assessment Screening (EIA Screening) as well other environmental assessments, it will ensure that international connectivity is achieved without net loss to marine biodiversity (pg. 1, 23, 30). Please see *inter alia* the accompanying NIS and Non-Statutory Environmental Assessment, which are submitted with the application.

Separately, we note that ACP must perform its assessment/statutory functions in a manner consistent, as far as practicable, with the objectives of s. 15 of the Climate Act.

6.5 Regional Spatial & Economic Strategy (RSES) for the Southern Region

The RSES is a 12-year framework designed to manage population and economic growth while transitioning to a competitive, innovative, and smart region. A subsea cable to the UK directly aligns with Regional Policy Objectives related to digital connectivity and the development of the "Eastern Economic Corridor".

The project will serve as a "Key Enabler" for the region, providing the high-speed data infrastructure necessary to support the "Smart Cities" and "Learning Regions" envisioned for Cork, Limerick, and Waterford (pg. 25, 27).

6.6 South Coast Designated Maritime Area Plan (SC-DMAP)

The SC-DMAP is Ireland's first sub-national forward spatial plan for Offshore Renewable Energy (ORE), specifically identifying four maritime areas off the south coast for fixed-bottom wind development.

While the plan's primary focus is ORE, it explicitly promotes co-existence with other marine activities, including telecommunications. S. 7.4 of the SC-DMAP states the following:

“Maritime Areas A, B, C and D are designated with sufficient space to allow flexibility at the project level to design and plan for cable routes and crossing points that address the requirements of both the ORE and telecommunications sector where co-existence occurs.”

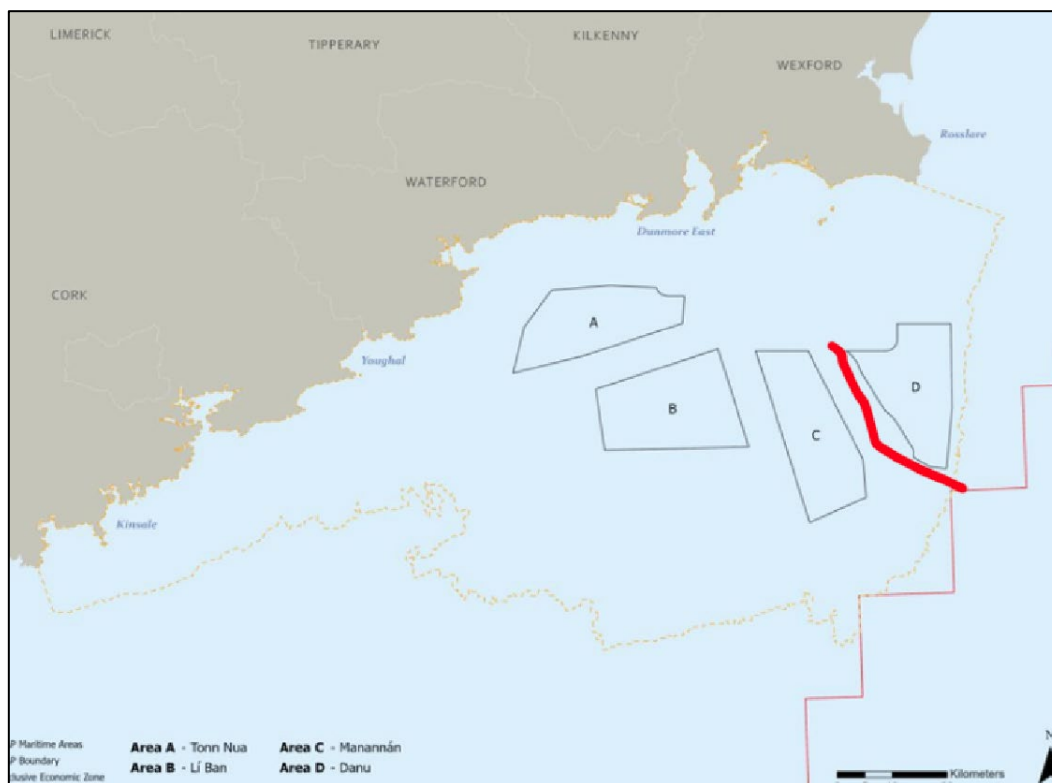


Figure 6.1: Overlay of Figure 2 of the SC-DMAP Document (October 2024) with submitted Site Location Plan.

Notwithstanding, the allowance for co-existence, the proposed development has been anticipatorily designed to avoid Areas C and D of the SC-DMAP.

6.7 Wexford County Development Plan 2022 - 2028

As the local planning authority in respect of the cable landfall works, we have considered it prudent to outline the proposed developments aligned with the Wexford County Development Plan. (We note that Wexford County Council’s Planning Department has granted permission for onshore works related to the landfall of the Beaufort Cable System at Kilmore Quay. In our opinion, this signifies Wexford County Council’s support for the project.)

The Wexford County Development Plan for 2022 to 2028, adopted 13 June 2022, sets out the County’s strategy for proper planning and sustainable development for beyond the 6 years of the plans allocated lifetime. It covers an extensive range of developments relating to those in proximity to the sea, telecommunication infrastructure, and natural amenities, of which this proposal specifically relates to.

Telecommunications

As part of the County’s infrastructure strategy, the Plan states in that:

“To facilitate the provision of key infrastructure in a timely manner to support the growth of county in line with the Core Strategy, Settlement Strategy and Economic Development Strategy.” (Pg. 378);

and,

“To facilitate the development of high speed telecommunications and ICT infrastructure throughout the county in order to grow and develop economic activity, to enhance learning and education facilities and contribute to the social wellbeing of our residents, particularly in rural areas in the county.” (Pg. 378).

[Our emphases.]

These policies demonstrate the support to be given by WCC to proposals relating to telecommunications infrastructure, Furthermore, as mitigation measures are proposed that ensure no significant impacts on will arise on protected areas, a proposal of this type should be supported by the Planning Authority and facilitated in a “timely-manner”.

Coastal Zone Management and Marine Spatial Planning

As part of the County’s strategy for future development in its coastal areas, the Plan states in the opening of Chapter 12 that:

“The sea is a very important asset for our county and region, offering significant economic potential, particularly, in the areas of fishing and aquaculture, transport, shipping, tourism and offshore energy production. Many activities and uses that take place on land or in the sea can have impacts on both the land and the maritime area, and it is therefore important that these interactions are considered.” (Pg. 490).

The County Development Plan recognises the sea as a critical strategic asset whose economic, social, and environmental value must be carefully protected and enhanced. It emphasises that coastal areas accommodate a wide range of interdependent activities and that development must be managed in a way that respects the dynamic relationship between land-based and marine uses. The proposed cable development directly aligns with this objective by supporting essential maritime-based infrastructure while ensuring that its interaction with the coastal zone is both minimal and environmentally responsible.

By utilising the established ESAT-1 landfall point and following an optimised offshore route that avoids sensitive features, including the Saltee Islands SAC, the proposal carefully manages the interface between land and sea in a way consistent with the Plan’s direction that such interactions be thoughtfully considered. The installation methodology, including the use of modern low-impact burial tools and adherence to best-practice vessel management and environmental controls, ensures that the marine environment remains protected and coastal processes remain unaffected.

Importantly, the project will enhance the county’s economic potential (one of the core ambitions outlined in Chapter 12) by strengthening digital infrastructure.

7.0 DOCUMENTS SUBMITTED WITH THIS PLANNING REPORT

There are 2 hard copies of each of the following *documents* submitted with the application (8 soft copies have been included as well):

1. Application Form.
2. Site Notice erected on 20 April 2026. (We note that there is no statutory requirement to erect a site notice as part of a marine planning application; however, the applicant considered it prudent to erect one at the location where a notice was erected for the onshore development works under WCC Ref. 20250330 to notify *inter alia* people local to the area where the onshore works are. As such the site notice location is not marked on the site location map but we provide an image and map, below.)





3. Newspaper Notice published in the Irish Daily Star and Irish Mirror on 22 April 2026.
4. Planning Application Fee (see enclosed cheque to the sum of €100,000 – see receipt as Appendix B of this document).
5. MAC details (Ref. MAC 240030).
6. Planning Report (this document), prepared by Tom Phillips + Associates.
7. Prescribed Bodies Letters.
8. Construction Environmental Management Plan, prepared by MDM Engineering.
9. Off Shore Works Methodology, prepared by MDM Engineering.
10. Rehabilitation Plan and Schedule, prepared by MDM Engineering.
11. AA Screening and Natura Impact Statement, prepared by Altemar Marine & Environmental Consultancy.
12. Ecological Impact Assessment, prepared by Altemar Marine & Environmental Consultancy.
13. Annex IV Assessment, prepared by Altemar Marine & Environmental Consultancy.
14. Non-Statutory Environmental Report, prepared by Altemar Marine & Environmental Consultancy.
15. Marine Archaeological Assessment, prepared Mizen.

There are 2 copies of each of the following *drawings* submitted with the application:

Drawing No.	Title	Size	Scale	Rev.
1354-ACP-100	Site Location Map	A3	1:180,000	2
1354-ACP-101	Site Layout Map 1	A3	1:50,000	2
1354-ACP-102	Site Layout Map 2	A3	1:50,000	2
1354-ACP-103	Site Layout Map 3	A3	1:50,000	2
1354-ACP-104	Site Layout Map 4	A3	1:50,000	2
1354-ACP-105	Greenlink Interconnector Crossing Details	A3	As shown (1:50/1:150)	1
1354-ACP-106	Trenching and Crossing Details	A3	As shown (1:10/1:20)	1

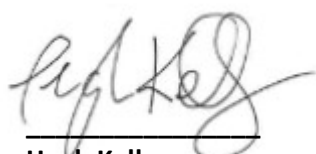
8.0 CONCLUSION

In our professional town planning opinion, the proposed development of this telecommunications cable system should be permitted, in doing so helping to provide much needed infrastructure and to achieve established national and local planning objectives. In summary, the proposed scheme should be permitted for the following reasons:

1. National policy supports telecommunications development:
 - **National Planning Frameworks** emphasise further development of high-speed telecommunications infrastructure where the proposal has a clear approach with respect to land and seascape environments.
2. Local policy supports telecommunications development:
 - **WCC Development Plan 2022-2028** provides the Council's support for development of high-speed telecommunications infrastructure that will benefit the local community and those across the nation alike.

We hope that all the above is in order, and please do not hesitate to contact the undersigned should you have any queries on the above.

Yours sincerely



Hugh Kelly
Associate
Tom Phillips + Associates



Appendix A: MDM Entry in Electronic Register of Authorised Undertakings (COMREG)

SERVICE DETAILS

Provider Name: McMahon Design and Management Ltd.

Network Type: Other Fixed Network

Service Type: Data Services

Publically Available: Yes

Commencement Date: 25/09/2024

Geographical Areas: Dublin, Nationwide

Further Details: Provision of network services related to Submarine, Fibreoptic, Telecoms Cables.



Appendix B: RECEIPT OF APPLICATION FEE PAYMENT

Bank of Ireland 
BUSINESS ON LINE

Payment Details

Payment Reference No. 240275343

Printed On
Thursday, April 09, 2026
01:04:20 PM

Pay From >	CURRENT ACCOUNTS , MALAHIDE CO DUBLIN , 19067475
Pay To >	AN BORD PLEANALA , IBANIE70AIBK93105500316067
Payment Details >	€100,000.00 on 09/04/2026, SEPA Payment
Status >	Payment Processed



APPENDIX C: COMPLIANCE MATRIX OF NMPF OBJECTIVES

Policy Name	Description	Relevant to the Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Environmental			
<p>Ocean Health Policy 1</p>	<p>Compliance with NMPF policies relating to:</p> <ul style="list-style-type: none"> • Biodiversity • Non-Indigenous Species • Water Quality • Sea-floor and Water Column Integrity • Marine litter • Underwater Noise <p>should include demonstration of contribution to the relevant MSFD targets identified.</p>	<p>Yes</p>	<p>The proposed development is a subsea cable which comprises construction, operational and decommissioning phases. Compliance with NMPF policies has been embedded into the design of the proposed development wherever possible. Where this has not been possible, additional mitigation and monitoring measures are proposed to ensure compliance.</p> <p>The NIS notes that there will be no significant impacts from the proposed development and will also align with MSFD targets.</p> <p>Route selection has been designed to avoid sensitive habitats while a jetting trencher will also be used during construction phase, causing minimal disruption.</p> <p>It should be noted that the noise generated from the vessel laying activity is relatively minor, similar in nature to trawling activity.</p> <p>The assessments conducted concluded that the proposed development will not have a negative effect on achieving good environmental status for the 11 current MSFD targets which demonstrates compliance of the proposed development with</p>



			Environmental – Ocean Health Policy 1.
Biodiversity Policies			
Biodiversity Policy 1	<p>Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid, b) minimise, or c) mitigate</p> <p>significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity.</p>	Yes	<p>The proposed development is not anticipated to have significant adverse impacts on species adaptation or migration or natural habitat connectivity.</p> <p>As per section 9.0 of the EclA, the overall impact of the ecology of the proposed works will result in short term/minor adverse/not significant residual effect on the ecology of the area and locality overall.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 1.</p>
Biodiversity Policy 2	Proposals that protect, maintain, restore and enhance the distribution and net extent of	Yes	The assessments carried out in relation to the proposed development have included measures to avoid, minimise



	<p>important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats.</p>		<p>and mitigate against any potential adverse effects on the distribution and net extent of important habitats and other habitats that important species depend on. No significant adverse impacts on such habitats are expected.</p> <p>The NIS, section 4.3 and 4.4, identifies potential migratory species and conclude there will be no effects. Any disturbances are minimal, short-term, and not likely to have any significant effect.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 2.</p>
<p>Biodiversity Policy 3</p>	<p>Where marine or coastal natural capital assets are recognised by Government:</p> <ul style="list-style-type: none"> • Proposals must seek to enhance marine or coastal natural capital assets where possible. • Proposals must demonstrate that they will in order of preference, and in accordance with legal requirements: <ul style="list-style-type: none"> a) avoid, b) minimise, or c) mitigate significant adverse impacts on marine or coastal natural capital assets, or d) if it is not possible to mitigate significant adverse impacts on marine or coastal natural 	<p>(Seabed?) No</p>	<p>The design has been developed to avoid, where possible, impacts on marine or coastal natural capital assets, such as flora and fauna, air, water, geology and soils. The use of a jetting trencher will minimise disruption over cutting and the following mitigation measures will be put in place for the duration of the project;</p> <ul style="list-style-type: none"> • Ecological supervision and compliance with “Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (NPWS, 2014) will be carried out, • A project ecologist will also be onboard the vessel to



	capital assets proposals must set out the reasons for proceeding.		<p>mitigate impacts on seabirds from proximate SPA's,</p> <ul style="list-style-type: none"> • mitigation by design of route selection, • onsite monitoring, • the presence of a MMO <p>Section 4.4 of the NIS clarifies that the proposed works are not directly connected with, or necessary to, the management of Natura 2000 sites.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 3.</p>
Biodiversity Policy 4	<p>Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid, b) minimise, or c) mitigate</p> <p>significant disturbance to, or displacement of, highly mobile species.</p>	Yes	<p>The assessments carried out have included measures to avoid, minimise and mitigate against any potential adverse effects on highly mobile species.</p> <p>Evidence of this is included within section 4.3.1 of the NIS and SISAA and section 3.3 of the EclA. These are titled Marine Mammals – seals and cetaceans. The Zol of the project has been extended to include Natura 2000 sites within the relevant foraging reange/MU of these species.</p> <p>The embedded mitigation measures discussed within these sections ensure compliance with Biodiversity Policy 4.</p>
Protected Marine Site Policies			
Protected Marine Sites Policy 1	Proposals must demonstrate that they can be implemented without	Yes	The Developer has prepared a Natura Impact Statement (NIS) which is included



	<p>adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.</p>		<p>within the planning application, which assessed whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. It concluded that the proposed works are not directly connected with, or necessary to, the management of Natura 2000 sites.</p> <p>Please refer to the NIS document prepared for the proposed development for a full detailed analysis of each SAC and SPA.</p> <p>The NIS ensures compliance with Protected Marine Sites 1.</p>
Protected Marine Sites Policy 2	<p>Proposals supporting the objectives of protected marine sites should be supported and:</p> <ul style="list-style-type: none"> • be informed by appropriate guidance • must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites 	Yes	<p>The Developer has prepared a NIS and NSER to assess whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site.</p> <p>These documents were informed by the relevant statutory documents from an international level (EU) to a local level.</p> <p>The guidance used to inform the NIS and NSER ensures compliance with Protected Marine Sites Policy 2.</p>
Protected Marine Sites Policy 3	<p>Proposals that enhance a protected marine site's ability to adapt to climate change, enhancing the resilience of the protected</p>	No	<p>Protected Marine Sites Policy 3 is not relevant to the proposed development as the project is not designed to enhance a site's ability to adapt to climate</p>



	<p>site, should be supported and:</p> <ul style="list-style-type: none"> • be informed by appropriate guidance • must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites. 		<p>change or enhance the resilience of the protected site.</p>
<p>Protected Marine Sites Policy 4</p>	<p>Until the ecological coherence of the network of protected marine sites is examined and understood, proposals should identify, by review of best available evidence (including consultation with the competent authority with responsibility for designating such areas as required), the features, under consideration at the time the application is made, that may be required to develop and further establish the network. Based upon identified features that may be required to develop and further establish the network, proposals should demonstrate that they will, in order of preference, and in accordance with legal requirements:</p> <ul style="list-style-type: none"> a) avoid, b) minimise, or c) mitigate <p>significant impacts on features that may be required to develop and</p>	<p>Yes</p>	<p>The Developer has prepared a Natura Impact Statement (NIS) which is included within the planning application, which assessed whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. The assessment concluded that the development will not result in likely adverse impacts on European Sites. This assessment can be found under section 4.5.2 <i>Identification of Plans/Projects that could act In Combination.</i></p> <p>The NIS ensures compliance with Protected Marine Sites Policy 4.</p>



	<p>further establish the network, or</p> <p>d) if it is not possible to mitigate significant impacts, proposals should set out the reasons for proceeding.</p>		
Non-indigenous Species Policies			
Non-indigenous Species Policy 1	<p>Reducing the risk of the introduction and / or spread of non-indigenous species is a requirement of all proposals. Proposals must demonstrate a risk management approach to prevent the introduction of and / or spread of non-indigenous species, particularly when:</p> <p>a) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another,</p> <p>b) introducing structures suitable for settlement of non-indigenous species, or the spread of non-indigenous species known to exist in the area of the proposal.</p>	Yes	<p>The proposed development will have to adhere to Condition 34 of the Foreshore Licence which states that:</p> <p><i>“All visible ‘hitchhikers’, invasive alien species, to be removed from any machinery and equipment prior to entering the intertidal area. Method statement to that effect should be submitted to the Foreshore Unit.”</i></p> <p>As the proposed development will be a direct continuation, it is considered that this mitigation measure will reduce the risk of any non-indigenous/invasive species from settling in the area, without being a necessary mitigation measure of the proposed development.</p> <p>It should also be noted that the surrounding seawater is used for the jetting system, i.e. nothing alien is introduced into the environment and burial tool does not remove any seabed materials from the area.</p>
Water Quality Policies			
Water Quality Policy 1	Proposals that may have significant adverse	No	Water Quality Policy 2 is not relevant as the proposed



	<p>impacts upon water quality, including upon habitats and species beneficial to water quality, must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate</p> <p>significant adverse impacts.</p>		<p>works are unlikely to have a significant impact on water quality of the area, including impacting the water quality status. This is highlighted in section 4.5.5 of the NIS and Section 3.0 of the EclA.</p>
Water Quality Policy 2	<p>Proposals delivering improvements to water quality, or enhancing habitats and species, which can be of benefit to water quality, should be supported.</p>	No	<p>Water Quality Policy 2 is not relevant to the proposed development as the project is not designed to improve water quality, nor enhance habitats and species.</p>
Sea-floor and Water Column Integrity Policies			
Sea-floor and Water Column Integrity Policy 1	<p>Proposals that incorporate measures to support the resilience of marine habitats will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority and where they contribute to the policies and objectives of this NMPF. Proposals which may have significant adverse impacts on marine, particularly deep sea, habitats must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid,</p>	Yes	<p>The proposed development will require seabed installation of fibre optic cables. Cable installation produces only a minor plume of suspension of seabed sediments in the water column, and this is transient and localised due to the nature of the burial and natural backfill activities.</p> <p>There is no significant noise generation during burial operations, highlighted in Section 11.0 of the NSER. Due to the assessed level of impact being not significant, the proposed development is compliant with Sea Floor and Water Column Integrity policy 1. Notwithstanding</p>

	<p>b) minimise, or</p> <p>c) mitigate significant adverse impacts on marine habitats, or</p> <p>d) if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding.</p>		<p>this, please see mitigation measures proposed in the submitted NIS, which will mitigate any likely adverse impacts on European sites that may arise.</p>
<p>Sea-floor and Water Column Integrity Policy 2</p>	<p>Proposals, including those that increase access to the maritime area, must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate adverse impacts on important habitats and species.</p>	<p>Yes</p>	<p>The proposed development will require seabed installation of fibre optic cables. Cable installation produces only a minor plume of suspension of seabed sediments in the water column, and this is transient and localised due to the nature of the burial and natural backfill activities.</p> <p>There is no significant noise generation during burial operations, highlighted in Section 11.0 of the NSER. Due to the assessed level of impact being not significant, the proposed development is compliant with Sea Floor and Water Column Integrity policy 1. Notwithstanding this, please see mitigation measures proposed in the submitted NIS, which will mitigate any likely adverse impacts on European sites that may arise.</p>
<p>Sea-floor and Water Column Integrity Policy 3</p>	<p>Proposals that protect, maintain, restore and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the</p>	<p>No</p>	<p>Sea-floor and Water Column Integrity Policy 3 is not relevant as the proposed works do not impact coastal habitats or ecosystem services. Found under section 9.0 of the NSER:</p>

	<p>outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must take account of the space required for coastal habitats, for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <p>a) avoid,</p> <p>b) minimise , or</p> <p>c) mitigate for net loss of coastal habitat</p>		<p><i>“the operational presence of the cable will not give rise to effects on the offshore seascape or coastal landscape character...</i></p> <p><i>... Given the offshore location and limited installation period, no significant effects on landscape or seascape receptors are anticipated.”</i></p> <p>Please also note section 21.0 (Screening of significance of environmental effects) of the NSER for further clarification.</p> <p>Consequently, the proposed development complies with the requirements of Sea-floor and Water Column Integrity Policy 3.</p>
<p>Marine Litter Policies</p>			
<p>Marine Litter Policy 1</p>	<p>Proposals that facilitate waste re-use or recycling, or that reduce marine and coastal litter will be supported, where they contribute to the policies and objectives of this NMPF. Proposals that could potentially increase the amount of litter that is discharged into the maritime area, either intentionally or accidentally, must include measures (such as development of a waste management plan) to, in order of preference and in</p>	<p>Yes</p>	<p>The EU waste hierarchy and basic principles will be followed to manage waste through the duration of the development. This is outline in sections 4.14, 4.15 and 4.16 of the <i>Beaufort Rehabilitation Scheme</i>.</p> <p>During the decommissioning of the cable, national waste policies will be followed during disposal which is outlined in section 5.12, 5.18 and 5.19 of the <i>Beaufort Rehabilitation Scheme</i>.</p>



	<p>accordance with legal requirements:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate</p> <p>the litter. Demonstration of these measures must provide satisfactory evidence that the proposal is able to manage all waste without creation of litter.</p>		<p><i>“The recovered cable will be offloaded and disposed of in accordance with Irish and EU waste management regulations and rules applicable at the time. The cable materials will be re-processed or recycled.”</i></p> <p>Consequently, the proposed development complies with the requirements of Marine Litter Policy 1.</p>
Underwater Noise Policies			
Underwater Noise Policy 1	<p>Proposals must take account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna.</p> <p>Where the potential for significant impact on marine fauna from underwater noise is identified, a Noise Assessment Statement must be prepared by the proposer of development. The findings of the Noise Assessment Statement should demonstrably inform determination(s) related to the activity proposed and the carrying out of the activity itself.</p> <p>The content of the Noise Assessment Statement should be relevant to the</p>	Yes	<p>The noise impact from the proposed development will emit noise due to the vessel and the acoustics from the USB (Ultra Short Baseline) and therefore is expected to create some level of underwater noise. Underwater noise assessment was undertaken as part of the NIS to assess the likely significant effects on marine fauna.</p> <p>Section 6.0 of the NIS considered the loudest noise and the greatest potential impact range, which was from the USBL. The noise emitted from a USBL is below the TTS- and PTS-onset threshold injury levels indicated by Southall <i>et al.</i> (2019), negative impacts may be foreseen if Low Frequency Cetaceans are close enough to the equipment to receive sound levels above this indicative threshold.</p>



	<p>particular circumstances and must include:</p> <ul style="list-style-type: none"> • Demonstration of compliance with applicable legal requirements, such as necessary assessment of proposals likely to have underwater noise implications, including but not limited to: <ul style="list-style-type: none"> » Appropriate Assessment (AA); » Environmental Impact Assessment (EIA); » Strategic Environmental Assessment (SEA); » Specific response to 'strict protection' requirements of Article 12 of the Habitats Directive in relation to certain species listed in Annex IV of the Directive; and » Species protected under the Wildlife Acts. • An assessment of the potential impact of the development or use on the affected species in terms of environmental sustainability; • Demonstration that significant adverse impacts on marine fauna resulting from underwater noise will, in order of preference and in accordance with legal requirements be: <ul style="list-style-type: none"> a) avoided, b) minimised, or 		<p>It should be noted that, due to the slow speed of the vessel during cable burial (0.5 knots), acoustic noise emitted from the main lay vessel is expected to be low.</p> <p>The conclusion states that an underwater source noise level of 207dB (which the proposed main lay will not exceed) does not result in injury hazards once a minimum separation distance of 12 metres is maintained between the source of the noise and the cetacean.</p> <p>Section 11.0 of the NSER, submitted with the application, outlines that any works involved with the development will be contained with very limited local disturbance.</p> <p>Consequently, a standalone Noise Assessment Statement is not required.</p> <p>Consequently, the proposed development complies with the requirements of Underwater Noise Policy 1.</p>
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	<p>c) mitigated, or</p> <p>d) if it is not possible to mitigate significant adverse impacts on marine fauna, the reasons for proceeding must be set out.</p> <p>This policy should be included as part of statutory environmental assessments where such assessments require consideration of underwater noise.</p>		
Air Quality Policies			
Air Quality Policy 1	<p>Proposals that support a reduction in air pollution should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must demonstrate consideration of their contribution to air pollution, both direct and cumulative.</p>	No	Air Quality Policy 1 is not relevant to the proposed development as the project is not designed to reduce air pollution.
Air Quality Policy 2	<p>Where proposals are likely to result in or facilitate an increase in air pollution, proposals should demonstrate that they will, in order of preference in accordance with legal requirements and standards:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate</p>	No	Air Quality Policy 2 is not relevant to the proposed development as the project is not likely to increase air pollution.



	air pollution.		
Climate Change Policies			
Climate Change Policy 1	<p>Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> • avoid contribution to adverse changes to physical features of the coast; • enhance, restore or recreate habitats that provide a flood defence or carbon sequestration ecosystem services where possible. <p>Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements:</p> <ol style="list-style-type: none"> a) avoided, b) minimised, c) mitigated, d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out. <p>This policy should be included as part of statutory environmental assessments where such assessments are required</p>	No	<p>The proposed development was subject to an AA screening and subsequently an NIS report. The proposed development will not impact the coastline or contribute to adverse changes to physical features of the coast and avoids significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services, as outlined in section 9.0 and section 21.0, point 14., of the NSER.</p> <p>Therefore, the proposed development is not relevant to Climate Change Policy 1.</p>
Climate Change Policy 2	For the lifetime of the proposal, the following climate change matters must be demonstrated:	No	As highlighted in section 4.2.4 of the NIS, the proposed development is expected to take less than 2



	<ul style="list-style-type: none"> • estimation of likely generation of greenhouse gas emissions, both direct and indirect; • measures to support reductions in greenhouse gas emissions where possible; • likely impact of climate change effects upon the proposal from factors including but not limited to: sea level rise, ocean acidification, changing weather patterns; • measures incorporated to enable adaptation climate change effects; • likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities; • where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements: <ul style="list-style-type: none"> a) avoided, b) minimised, c) mitigated, 		<p>weeks in total and will be completed over a 2 month period.</p> <p>The proposed works comprise short-duration subsea cable installation activities, undertaken over two weeks within a two month period. The works are temporary, localised, and limited to installation activity. In addition, no operational emissions occur once works are complete.</p> <p>As highlighted in Section 15.0 of the NSER,</p> <p><i>“given the nature of the installation operations which will be conducted over a short timeframe, the quantity of emissions will be small and effects contributing to climate change will not arise.”</i></p> <p>The final laid cable is not powered and will not produce any emissions. Therefore, the proposed development is not relevant to Climate Change Policy 2.</p>
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	d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.		
Co-existence Policies			
Co-existence Policy 1	<p>Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference:</p> <p>a) minimise significant adverse impacts,</p> <p>b) mitigate significant adverse impacts, or</p> <p>c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</p>	Yes	<p>The plan includes measures to be implemented to facilitate co-existence (details found within the CEMP).</p> <p>In tandem with the CBRA licencing and environmental legislation, the cable has been carefully thought out to ensure minimal impact on the environment.</p> <p>The developer will create and ensure the contractor implements cable specification and installation measures, a Vessel Management Plan (VMP) (section 5.6) and a Fisheries Management and Mitigation Strategy (FMMS) (section 5.4).</p> <p>In addition, advisory safety zones will be established, the details of the development will be published in Notice to Mariners and included on updated nautical charts. (section 5.6.7)</p> <p>Specifically in relation to the projects/developments that the proposed development will likely co-exist with, namely the Greenlink Interconnector, other subsea cables, and the SC-DMAP, the proposed development includes measures to avoid impacts on those</p>

			<p>projects/developments. In relation to the SC-DMAP, the proposed development has been designed to avoid all areas A-D, inclusive. See the accompanying method of works document for further information.</p> <p>The project design and the implementation of the management plans ensure compliance with the Co-existence Policy 1.</p>
Infrastructure Policies			
Infrastructure Policy 1	Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.	No	Infrastructure Policy 1 is not relevant to the proposed development as the proposed development does not have any land-based infrastructure. However, we do note that the overall project does comprise land-based infrastructure at Kilmore Quay which received planning permission in June 2025.
Access Policies			
Access Policy 1	Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid, b) minimise, or c) mitigate significant adverse impacts on public access.	No	Access Policy 1 is not relevant to the proposed development as the project is not designed to have any impacts on public access.
Access Policy 2	Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider	No	Access Policy 2 is not relevant to the proposed development as the project is not designed to have any impacts on public access.

	the future provision of services for tourism and recreation activities, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.		
Employment Policies			
Employment Policy 1	<p>Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are</p> <ul style="list-style-type: none"> • in line with the skills available in Irish coastal communities adjacent to the maritime area, • improve the sustainable use of natural resources, • diversify skills to enable employment in emerging industries. 	No	Employment Policy 1 is not relevant to the proposed development as the construction of the project will comprise a short duration. However, the completed project will indirectly significantly benefit employment in Ireland through the development of a new state of the art fibre optic connection to the UK.
Heritage Assets Policies			
Heritage Assets Policy 1	Proposals that demonstrate they will contribute to enhancing the significance of heritage assets will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals unable to contribute to enhancing the significance of	Yes	<p>An Underwater Archaeological Impact Assessment (UAIA) was undertaken to assess potential impacts on marine cultural heritage (section 6.0 of the NSER).</p> <p>The main mitigation measure for the protection of known marine archaeological receptors will be avoidance. This will be achieved via the implementation and monitoring of archaeological exclusion</p>



	<p>heritage assets will only be supported if they demonstrate that they will, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate</p> <p>harm to the significance of heritage assets, and</p> <p>d) if it is not possible, to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. (see definition of 'Public Benefits' in the Glossary)</p>		<p>zones (AEZs), which are proposed for identified high value offshore archaeological and cultural heritage receptors. In such zone no works will be undertaken. All high value receptors with a potential for impact will have a minimum 100m AEZ. No known wrecks are within 100m of the cable route, therefore it will not enter any archaeological exclusion zones.</p> <p>The assessment concludes that:</p> <p><i>“with implementation of mitigation measures, no significant impacts on known archaeology are anticipated, although a precautionary approach is required due to the potential of undiscovered archaeology.”</i></p> <p>The proposed development complies with the Heritage Assets Policy 1.</p>
<p>Rural Coastal and Island Communities Policies</p>			
<p>Rural Coastal and Island Communities Policy 1</p>	<p>Proposals contributing to access, communications, energy self-sufficiency or sustainability of rural coastal and / or island communities should be supported. Proposals should ideally be inclusive of continual education, skills development and training in marine sectors, thus improving the sustainability, social benefits and economic resilience of rural and island communities.</p>	<p>No</p>	<p>Rural Coastal and Island Communities Policy 1 is not relevant to the proposed development as the project is not designed to contribute to access, communications, energy self-sufficiency or sustainability of rural coastal and / or island communities.</p>

Seascope and Landscape Policies			
Seascope and Landscape Policy 1	<p>Proposals should demonstrate how the likely significant impacts of a development on the seascope and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate</p> <p>significant adverse impacts on the seascope and landscape of the area.</p> <p>d) If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding.</p> <p>This policy should be included as part of statutory environmental assessments.</p>	Yes	<p>This proposal relates solely to seabed, as it comprises a subsea cable. The design and routing of the cable have been informed by consideration of potential seascope effects, with a clear preference to avoid significant adverse impacts through careful siting (section 5.3 of the CEMP).</p> <p>The proposed development complies with Seascope and Landscape Policy 1.</p>
Social Benefits Policies			
Social Benefits Policy 1	<p>Proposals that enhance or promote social benefits should be supported. Proposals unable to enhance or promote social benefits should demonstrate that they will, in order of preference:</p> <p>a) minimise, or</p> <p>b) mitigate</p>	No	<p>Social Benefits Policy 1 is not relevant to the proposed development as the installation operations are of short durations and will not result in any direct social changes such as demography, traditional lifestyles, or employment.</p>



	significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits.		
Social Benefits Policy 2	Proposals that increase the understanding and enjoyment of the marine environment (including its natural, historic and social value), or that promote conservation management and increased education and skills, should be supported.	No	Social Benefits Policy 2 is not relevant to the proposed development as the project is not designed to have any impacts on the understanding and enjoyment of the marine environment.
Transboundary Policies			
Transboundary Policy 1	Proposals that have transboundary impacts beyond the maritime area, on either the terrestrial environment or neighbouring international jurisdictions, must show evidence of consultation with the relevant public authorities, including terrestrial planning authorities and other country authorities. Proposals should consider transboundary impacts throughout the lifetime of the proposed activity.	Yes	<p>Notifications of the application for permission for the proposed development have been sent to the United Kingdom Department for Levelling Up, Housing and Communities and the Welsh Government's Energy Policy team.</p> <p>The proposed development is a subsea cable situated off the southeast coast of Ireland in the Irish Sea.</p> <p>No transboundary effects are anticipated at any stage during the construction, operation, or decommissioning of the proposed development.</p> <p>The cable will be installed subsea, resulting in no landscape or visual impacts. The proposed development is located entirely within Irish waters and is therefore not expected to give rise to</p>



			<p>any effects within UK waters.</p> <p>This has been further assessed in section 19.5 and 19.6 of the NSER.</p> <p>Therefore, the proposed development complies with Transboundary Policy 1.</p>
Aquaculture Policies			
Aquaculture Policy 1	<p>Proposals for sustainable development of aquaculture that:</p> <ul style="list-style-type: none"> • demonstrate use of innovative approaches, and / or • contribute to diversification of species being grown in a given locality, particularly proposals applying a multi-trophic approach, and / or • enhances resilience to the effects of climate change should be supported. 	No	The aquaculture policies are not relevant to the proposed development as the project is for a subsea cable with no aquaculture areas involved.
Aquaculture Policy 2	<p>Non-aquaculture proposals in aquaculture production areas must demonstrate consideration of, and compatibility with, aquaculture production. Where compatibility is not possible, proposals must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid; b) minimise; c) mitigate <p>significant adverse impacts on aquaculture.</p>	No	The aquaculture policies are not relevant to the proposed development as the project is for a subsea cable with no aquaculture areas involved.



	d) If it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding.		
Aquaculture Policy 3	Land-based coastal infrastructure that is critical to and supports development of aquaculture should be supported, in accordance with any legal requirements and provided environmental safeguards contained within authorisation processes are fully met	No	The aquaculture policies are not relevant to the proposed development as the project is for a subsea cable with no aquaculture areas involved.
Defence and Security Policies			
Defence and Security Policy 1	<p>Any proposal that has the potential to interfere with the performance by the Defence Forces of their security and non-security related tasks must be subject to consultation with the Defence Organisation. This includes potential interference with:</p> <ul style="list-style-type: none"> • Safety of navigation and access to naval facilities; • Firing, test or exercise areas; • Communication, and surveillance systems; • Fishery protection functions. <p>Proposals should only be supported where, having consulted with the Defence Organisation, they are satisfied that it will not result in unacceptable interference</p>	No	Defence and Security Policy 1 is not relevant to the proposed development as the project will not interfere with the performance by the Defence Forces.



	<p>with the performance by the Defence Forces of their security and non-security related tasks.</p> <p>Any proposal will be subject to the relevant Environmental Assessments, as set out in the introduction to this NMPP.</p>		
Natural Gas Storage Policies			
Natural Gas Storage Policy 1	<p>Subject to assessments required for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), natural gas storage proposals should be supported.</p>	No	<p>Natural Gas Storage Policy 1 is not relevant to the proposed development as the project is for a subsea fibre optic cable and has no gas components. The proposed development also does not cross any gas pipeline.</p>
ORE Policies			
ORE Policy 1	<p>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</p>	No	<p>The ORE policies are not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.</p>



	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).	Yes	The proposed development is not ORE; however, it has potential interactions with the SC-DMAP. The SC-DMAP expressly states that ORE can co-exist with telecommunications cables. Notwithstanding this, the proposed cable route has been selected to avoid SC-DMAP Areas A-D, inclusive. And will have no likely significant impacts on the plan.
ORE Policy 3	Any non-ORE proposals that are in or could affect sites held under a permission or that are subject to an ongoing permitting or consenting process for renewable energy generation (wind, wave or tidal should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, or	Yes	The proposed development is not ORE; however, it has potential interactions with the SC-DMAP. The SC-DMAP expressly states that ORE can co-exist with telecommunications cables. Notwithstanding this, the proposed cable route has been selected to avoid SC-DMAP Areas A-D, inclusive. And will have no likely significant impacts on the plan.

	<p>d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</p> <p>Applicants for non-ORE proposals in or affecting ORE sites should engage ORE developers in consultation during the pre-application processes as appropriate.</p>		
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.	No	This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.
ORE Policy 5	Proposals for activity that may adversely impact ORE test projects by virtue of being within or adjacent to ORE test sites, or between site and landfall of ORE test projects that may adversely impact ORE test site projects, should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts.	Yes	The proposed development is not ORE; however, it has potential interactions with the SC-DMAP. The SC-DMAP expressly states that ORE can co-exist with telecommunications cables. Notwithstanding this, the proposed cable route has been selected to avoid SC-DMAP Areas A-D, inclusive. And will have no likely significant impacts on the plan.
ORE Policy 6	Proposals for infrastructure enabling local use of excess energy generated from emerging marine technologies (wave, tidal, floating wind) should be supported.	No	This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.
ORE Policy 7	Where potential for ports to contribute to ORE is identified, plans and policies related to this port must encourage development in such a way as to facilitate ORE and related supply chain activity.	No	This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.



<p>ORE Policy 8</p>	<p>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.</p>	<p>Yes</p>	<p>The Greenlink Interconnector is a submarine power cable, installed in 2025. The Beaufort cable route will cross the Greenlink Interconnector. However, the crossing will include pre-lay works that install an articulated concrete mattress over the crossing point of the Interconnector cable. The Beaufort cable will then be laid over the concrete mattress.</p> <p>As a result, the proposed Beaufort cable laying methodology has been designed to prevent any potential cumulative effects with existing subtidal cables within the Irish EEZ.</p> <p>This ensures compliance with ORE Policy 8.</p>
<p>ORE Policy 9</p>	<p>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</p>	<p>No</p>	<p>This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.</p>

	<p>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.</p>		
ORE Policy 10	<p>Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible.</p>	No	<p>This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.</p>
ORE Policy 11	<p>Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.</p>	No	<p>This ORE policy is not relevant to the proposed development as the project is for a subsea cable with no impact or contribution to renewable energy.</p>
Petroleum Policies			
Petroleum Policy 1	<p>Proposals in areas where petroleum activities or petroleum production infrastructure have already been approved, or where applications consistent with the Government's prohibition on new exploration activity are under consideration, should only be authorised where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or the</p>	No	<p>The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist.</p>



	<p>proposal is clearly of strategic or national importance.</p> <p>Compatibility should be achieved, in order of preference, through:</p> <p>a) avoiding, or</p> <p>b) minimising, or</p> <p>c) mitigating adverse impacts.</p> <p>d) If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</p>		
Petroleum Policy 2	<p>Proposals potentially affecting future potential activity in areas (blocks) subject to existing petroleum authorisations should avoid sterilisation of that area for future petroleum-related activity consistent with Government policy, and demonstrate how they, in order of preference:</p> <p>a) avoid, or</p> <p>b) minimise, or</p> <p>c) mitigate potential adverse impacts on those activities.</p> <p>d) If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</p>	No	The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist. Also the surface area of the final laid cable is minimal.
Transmission Policies			



<p>Transmission Policy 1</p>	<p>Subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland’s energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations.</p> <p>This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government’s target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system / interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems.</p>	<p>No</p>	<p>Transmission Policy 1 is not relevant to the proposed development as the proposed development is not a transmission project.</p>
<p>Transmission Policy 2</p>	<p>Proposals for activities that are in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for energy transmission proposals should demonstrate that they will, in order of preference:</p>	<p>Yes</p>	<p>The Greenlink Interconnector is a submarine power cable, installed in 2025. The Beaufort cable route will cross the Greenlink Interconnector. However, the crossing will include pre-lay works that install an articulated concrete mattress over the crossing point of the Interconnector</p>



	<p>a) avoid,</p> <p>b) minimise,</p> <p>c) mitigate adverse impacts, or</p> <p>d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</p>		<p>cable. The Beaufort cable will then be laid over the concrete mattress.</p> <p>As a result, the proposed Beaufort cable laying methodology has been designed to prevent any potential cumulative effects with existing subtidal cables within the Irish EEZ.</p> <p>The proposed development is not in an area that could currently affect energy transmission proposals, however there are proposals in the Tonn Nua Area A (as identified in the SC-DMAP). It has been predicted that no interaction with Beaufort installation is likely.</p> <p>This ensures compliance with Transmission Policy 2.</p>
Transmission Policy 3	Decisions on transmission developments should be informed by consideration of space required for other activities of national importance described in the NMPP.	No	Transmission Policy 3 is not relevant to the proposed development as the proposed development is not a transmission project.
Transmission Policy 4	Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies. Designation of land-based zones for the purposes of co-ordination and integration with relevant Marine Plans must be considered, where appropriate.	No	Transmission Policy 4 is not relevant to the proposed development as the proposed development is not a transmission project.
Transmission Policy 5	Proposals for construction or operation activities within one nautical mile of	No	Transmission Policy 5 is not relevant to the proposed development as the



	<p>either of the two existing natural gas interconnector pipelines shall be avoided.</p> <p>If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered.</p> <p>If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures be put in place or the proposed activities altered</p>		<p>proposed development does not come within the existing natural gas interconnector pipelines.</p>
<p>Transmission Policy 6</p>	<p>Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation</p>	<p>No</p>	<p>Transmission Policy 6 is not relevant to the proposed development as the proposed development does not transmit/import gas.</p>



	of fracked gas, additional proposals for natural gas transmission/ import infrastructure should be supported.		
Fisheries Policies			
Fisheries Policy 1	<p>Proposals that may have significant adverse impacts on access for existing fishing activities, must demonstrate that they will, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise, or</p> <p>c) mitigate such impacts.</p> <p>d) If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.</p>	Yes	<p>The proposed cable route is within an area of existing vessel traffic and fishing activity. However, the cable will be buried at a depth that the cable will be secure from fishing activities.</p> <p>During the post-lay greenlink interconnector crossing rock berm construction, the side slopes will be installed to a 1:3 ratio to provide hydraulic stability and protection from snagging of fishing gear etc. (NIS section 4.0 description of proposed development.)</p> <p>Upon implementation of the FMMS any effects on fishing activities are not expected to be significant (Section 5.4.7).</p> <p>This ensures compliance with Fisheries Policy 1.</p>
Fisheries Policy 2	<p>Where significant impact upon fishing activity arising from any proposal is identified, a Fisheries Management and Mitigation Strategy (FMMS) should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and other interests as appropriate. All efforts should be made to agree the FMMS with those interests. Those interests should also undertake to engage with</p>	Yes	<p>A FMMS will be prepared in consultation with the local fishing interests. It is provided within section 5.4 of the CEMP document submitted with this application.</p> <p>Upon implementation of the FMMS any effects on fishing activities are not expected to be significant (Section 5.4.7).</p> <p>This ensures compliance of the proposed development with Fisheries Policy 2.</p>



	<p>the proposer and provide best available, transparent and accurate information and data in a timely manner to help complete the FMMS. The FMMS should be drawn up as part of readying a proposal prior to submission, with measures identified to be considered in finalising conditions of any authorisations granted. Development of the strategy should be coordinated with other relevant assessments such as EIA where possible.</p> <p>The content of the Fisheries Management and Mitigation Strategy (FMMS) should be relevant to the particular circumstances and could include:</p> <ul style="list-style-type: none"> • An assessment of the potential impact of all stages of the development or other suggested use on the affected fishery or fisheries, both in socio-economic terms and in relation to environmental sustainability. This assessment should include consideration of any impact upon cultural identity within fishing communities, as well as identifying indirect / in-combination matters. • A recognition that the disruption to existing fishing opportunities / activity should be minimised as far as possible. 		
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	<ul style="list-style-type: none"> • Demonstration of the public benefit(s) that outweigh the significant impacts identified. • Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity. • Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socio-economic impacts. <p>Where it does not prove possible to agree the FMMS with all interests:</p> <ul style="list-style-type: none"> • Divergent views and the reasons for any divergence of views between the parties should be fully explained in the FMMS, and dissenting views should be given a platform within the said FMMS to make their case. • Where divergent views are identified, relevant public authorities should be engaged to identify informal and formal steps designed to enable proposal(s) to progress. 		
Fisheries Policy 3	Proposals that enhance the sustainability of fisheries or support a sustainable fishing industry, including the industry's diversification and or enhanced resilience to the effects of climate change, should be	No	Fisheries Policy 3 is not relevant to the proposed development as the proposed development is not designed to enhance fishery sustainability.



	supported provided they fully meet the environmental safeguards contained within authorisation processes.		
Fisheries Policy 4	Infrastructural proposals that enable access to fishing activities should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	No	Fisheries Policy 4 is not relevant to the proposed development as the proposed development does not enhance fishing activity.
Fisheries Policy 5	<p>Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. If proposals cannot enhance essential fish habitat, they must demonstrate that they will, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise,</p> <p>c) mitigate</p> <p>significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes.</p> <p>d) If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.</p>	Yes	<p>The proposed development will not enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes.</p> <p>Outlined in section 5.1.3 of the CEMP,</p> <p><i>“However, given the spatial and temporal nature of the proposed works, the proposed project is considered too distant from Natura 2000 sites where it is a feature of interest for any significant interaction to occur. Similarly, SACs designated for lamprey species were considered too distant for any significant interaction to occur.”</i></p> <p>The EclA also contains information (table 6a, 6b, 6c & 6d) on the potential effects of the development on marine life and habitats.</p> <p><i>“No designated conservation sites are located along the proposed Beaufort Offshore Cable Route.”</i> (Section 5.0 EclA)</p> <p>This ensures compliance with Fisheries Policy 5.</p>



<p>Fisheries Policy 6</p>	<p>Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to discuss any changes in infrastructure that may affect them.</p> <p>Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible.</p> <p>Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.</p>	<p>No</p>	<p>Fisheries Policy 6 is not relevant to the proposed development as the project is not a port or harbour development.</p>
<p>Mineral Exploration and Mining Policies</p>			
<p>Mineral Exploration and Mining Policy 1</p>	<p>Only proposals which are in line with national policy on mineral exploration and mining should be considered, provided they fully meet the environmental safeguards contained within the mineral exploration and mining consent processes.</p>	<p>No</p>	<p>The Mineral Exploration and Mining policy 1 is not relevant to the proposed development as the project contains no mining or mineral exploration aspects.</p>
<p>Ports, Harbours and Shipping Policies</p>			
<p>Ports, Harbours and Shipping Policy 1</p>	<p>To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use:</p>	<p>Yes</p>	<p>The Vessel Management Plan (VMP)(Section 5.6 CEMP) outlines a risk matrix and further information relating to mitigation measures. Table 10 of the CEMP includes a</p>



	<ul style="list-style-type: none"> • The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes; • A mandatory Navigation Risk Assessment; • Where interference is likely: whether reasonable alternatives can be identified; and • Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organisation can be achieved at no significant cost to the shipping or ports sector. 		<p>Navigational Risk Assessment (NRA).</p> <p><i>“With relevance to safety of shipping and navigation, mitigation will include publication of a formal Marine Notice, display of lights, shapes and other internationally recognised identification or warning signals on the cable lay vessel and compliance with all requirements of the International Regulations for Preventing Collisions at Sea.” (NSER section 18.2)</i></p> <p>This ensures compliance with Ports, Harbours and Shipping Policy 1.</p>
<p>Ports, Harbours and Shipping Policy 2</p>	<p>Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid, b) minimise, or c) mitigate significant adverse impacts, and d) if it is not possible to mitigate significant 	<p>No</p>	<p>Ports, Harbours and Shipping Policy 2 is not relevant to the proposed development has no significant impact on current or future port activity.</p>



	adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding.		
Ports, Harbours and Shipping Policy 3	Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate consideration of the National Ports Policy, the National Planning Framework, and relevant provisions related to the TEN-T network.	No	Ports, Harbours and Shipping Policy 3 is not relevant to the proposed development has no significant impact on current or future port activity.
Ports, Harbours and Shipping Policy 4	<p>Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have:</p> <ul style="list-style-type: none"> • been informed by consultation at pre-application stage or earlier with the relevant port authority; • have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and • have consulted Department of Transport, MSO and Commissioners of Irish Lights. <p>Applicants must continue to engage parties identified in pre-application processes as</p>	No	<p>Ports, Harbours and Shipping Policy 4 is not relevant to the proposed development has no significant impact on ports.</p> <p>However, the Developer will request that the relevant harbour masters, Port Authority or marina operator the appropriate information relating to the Beaufort Project (indicatively the NtM) be displayed at the following harbours and ports:</p> <ul style="list-style-type: none"> ○ Rosslare ○ Kilmore Quay ○ Dunmore East ○ Milford Haven <p>The Developer will also confirm the lines of communication for environmental compliance with the local authorities and relevant stakeholders</p>



	appropriate during the decision-making process.		and agreed reporting procedures will be detailed within the final CEMP.
Ports, Harbours and Shipping Policy 5	Proposals for capital dredging will be supported where it is necessary to safeguard national port capacity and Ireland's international connectivity, and where required compliance assessments associated with authorisations have been carried out and incorporated into subsequent competent authority decision(s).	No	Ports, Harbours and Shipping Policy 5 is not relevant to the proposed development as the project is not a dredging proposal.
Ports, Harbours and Shipping Policy 6	In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity.	No	Ports, Harbours and Shipping Policy 6 is not relevant to the proposed development as the project is not situated in areas of authorised dredging activity.
Ports, Harbours and Shipping Policy 7	Proposals for maintenance dredging activity will be supported where: <ul style="list-style-type: none"> • relevant decisions by competent authorities incorporate the outcome of statutory environmental assessment processes, as well as necessary compliance assessments associated with authorisations, including in relation to the planning process; • there will be no significant adverse impact on marine activities or uses or the maritime area. Any potential adverse 	No	Ports, Harbours and Shipping Policy 7 is not relevant to the proposed development as the project does not involve dredging activity.

	<p>impact will be, in order of preference, avoided, minimised or mitigated;</p> <ul style="list-style-type: none"> • dredged waste is managed in accordance with internationally agreed hierarchy of waste management options for sea disposal; • if disposing of dredged material at sea, existing registered disposal sites are used, in preference to new disposal sites; and • where they contribute to the policies and objectives of this NMPF 		
Ports, Harbours and Shipping Policy 8	<p>Proposals that cause significant adverse impacts on licensed disposal areas should not be supported. Proposals that cannot avoid such impact must, in order of preference"</p> <p>a) minimise,</p> <p>b) mitigate, or</p> <p>c) if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding.</p>	No	Ports, Harbours and Shipping Policy 8 is not relevant to the proposed development as the project is not situated in proximity to a licensed disposal area.
Ports, Harbours and Shipping Policy 9	<p>Proposals for the management of dredged material must demonstrate that they have been assessed against the waste hierarchy (see Glossary).</p>	No	Ports, Harbours and Shipping Policy 9 is not relevant to the proposed development as the project does not involve dredging activity.
Ports, Harbours and Shipping Policy 10	<p>Proposals identifying new dredge disposal sites which are subject to best practice and guidance from previous studies</p>	No	Ports, Harbours and Shipping Policy 10 is not relevant to the proposed development as it does not

	<p>should be supported where:</p> <ul style="list-style-type: none"> • competent authority decisions incorporate necessary compliance assessments associated with authorisations; and • they contribute to the policies and objectives of this NMPF. <p>Proposals must include an adequate characterisation study, be assessed against the waste hierarchy and must be informed by consultation with all relevant stakeholders.</p>		<p>identify new dredge disposal sites.</p>
Safety at Sea Policies			
Safety at Sea Policy 1	<p>Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will:</p> <ul style="list-style-type: none"> • Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout; and • Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels. 	No	<p>Safety at Sea Policy 1 is not relevant to the proposed development as the proposed development is for a subsea fibre optic cable and has no wind farm activities proposed.</p>
Safety at Sea Policy 2	<p>Proposals for infrastructure that have the potential to significantly reduce under-</p>	No	<p>Safety at Sea Policy 2 is not relevant to the proposed development as the proposed development</p>

	<p>keel clearance must demonstrate how they will, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise,</p> <p>c) mitigate adverse impacts, or</p> <p>d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</p>		<p>does not impact or reduce under keel clearance.</p>
Safety at Sea Policy 3	<p>All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.</p>	No	<p>Safety at Sea Policy 3 is not relevant to the proposed development as temporary lighting and marking will not be required during installation and cable maintenance or repairs and no permanent surface infrastructure will be introduced.</p>
Safety at Sea Policy 4	<p>Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.</p>	No	<p>Safety at Sea Policy 4 is not relevant to the proposed development as temporary lighting and marking will not be required during installation and cable maintenance or repairs and no permanent surface infrastructure will be introduced.</p>
Safety at Sea Policy 5	<p>Proposals must identify their potential impact, if any, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. Where a proposal may have a significant impact on</p>	No	<p>Safety at Sea Policy 5 is not relevant to the proposed development as the development will not impact SAR operations.</p> <p>Section 5.16 of the CEMP states:</p>



	<p>these operations it must demonstrate how it will, in order of preference:</p> <p>a) avoid,</p> <p>b) minimise,</p> <p>c) mitigate adverse impacts, or</p> <p>d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding, supported by parties responsible for maritime SAR.</p>		<p><i>“With relevance to safety of shipping and navigation, mitigation will include publication of a formal Marine Notice, display of lights, shapes and other internationally recognised identification or warning signals on the cable lay vessel and compliance with all requirements of the International Regulations for Preventing Collisions at Sea.”</i></p>
Sport and Recreation Policies			
Sport and Recreation Policy 1	<p>Proposals that promote sustainable development of water-based sports and marine recreation, while enhancing community health, wellbeing and quality of life, should be supported, provided that due consideration is given to environmental carrying capacities and tourism pressures.</p>	No	<p>Sport and Recreation Policy 1 is not relevant to the proposed development as the proposal is not designed to promote development of water-based sports and marine recreation.</p>
Sport and Recreation Policy 2	<p>Proposals should demonstrate the following in relation to potential impact on recreation and tourism:</p> <ul style="list-style-type: none"> • The extent to which the proposal is likely to adversely impact sports clubs and other recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure. 	Yes	<p>The NSER assesses recreation under section 14.0. Due to the distance of the development from the mainland, recreational activities and other nearshore water-based activities are spatially removed from the proposed works.</p> <p><i>“Given the offshore location, distance from recreational receptors, and temporary nature of</i></p>



	<ul style="list-style-type: none"> • The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety. • The extent to which the proposal is likely to adversely impact on the natural environment. 		<p><i>the works, no significant effects on recreational activities are anticipated.”</i></p> <p>This ensures compliance with Sport and Recreation Policy 2.</p>
Sport and Recreation Policy 3	Opportunities to promote inclusive development of water-based sports and marine recreation should be supported, where appropriate and at the applicable scale, with a focus on facilities for people with disabilities.	No	Sport and Recreation Policy 3 is not relevant to the proposed development as the proposal is not designed to promote inclusive development of water-based sports and marine recreation.
Sport and Recreation Policy 4	Proposals that improve access to marine and coastal resources for tourism activities, and sport and recreation should be supported, where appropriate, at the applicable scale and aligned with existing development plans.	No	Sport and Recreation Policy 4 is not relevant to the proposed development as the proposal is not designed to increase access to marine and coastal resources for sports and marine recreation.
Sport and Recreation Policy 5	Proposals should seek to enhance water safety through provision of appropriate International Organization for Standardization (ISO) and European Committee for Standardization (CEN) compliant safety signage. In general the safety of persons should be a key consideration for planners and due consideration should be given to best practice guidance for marine and coastal recreation areas endorsed	Yes	During the marine installation operations, the cable installation vessel will display lights, shapes and internationally recognised identification or warning signals. Mitigation measures will also ensure compliance with International Regulations for Preventing Collisions at Sea and standards, including the issuing of a formal marine notice.



	by the Visitor Safety in the Countryside Group.		This ensures compliance with Sport and Recreation Policy 5.
Telecommunications Policies			
Telecommunications Policy 1	Proposals that guarantee existing and future international telecommunications connectivity which is critically important to support the future needs of society, Government, the provision of Public Services and enterprise in Ireland, should be supported.	Yes	<p>The proposed development is for a subsea telecommunications cable. This cable will link Ireland to the UK to provide next generation diverse connectivity, with onward connectivity to Continental Europe. When fully operational, the cable will support high quality, robust and resilient access to international telecommunications networks - a key driver in social, economic and industrial growth, supporting the development of the region and of Ireland as a whole.</p> <p>The new Beaufort system will help ensure the long-term security of communications and resilient connectivity for Ireland and the UK. The system will make use of existing infrastructure such as ducts and the cable landing compound in Kilmore Quay.</p> <p>As Ireland's demand for digital bandwidth grows, replacing the ESAT-1 cable has become essential to sustaining resilient, high-capacity, international connectivity. This need is amplified by rapidly growing demand for secure data routes, with Ireland's digital economy already valued at €12.3bn (6% of GDP) and expected to expand further.</p>



			<p>The Beaufort Cable System therefore aims to reinforce Ireland–UK subsea connectivity, introduce modern high-speed capacity, diversify international routes, and support Ireland’s broader economic, social, and industrial development through a state-of-the-art fibre-optic link.</p> <p>This ensures compliance with Telecommunications Policy 1.</p>
<p>Telecommunications Policy 2</p>	<p>Preference should be given to proposals where evidence is provided of an integrated approach to development and activity, such as the bundling of cables (electricity and communications) where suitable, as well as pipelines for multiple activities, to minimise impacts on the marine environment, infrastructures and other users.</p> <p>Compatibility should be achieved, in order of preference, through:</p> <ul style="list-style-type: none"> a) avoiding, or b) minimising, or c) mitigating adverse impacts, or d) If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding. 	<p>Yes</p>	<p>There are no proposed third-party cables which could be bundled with the proposed development’s cables.</p> <p>Existing cable assets within the proposed development area have been identified. Crossing these cables will be done in accordance with the method of works. No adverse impacts on cable assets is likely to occur.</p> <p>Under section 4.2.1 of the NIS (Subsea Crossings) the burial depth and any requirement for protection measures are defined. The burial depth (1.5m) will ensure that the cable is adequately protected against scour and damage from activities such as potential laying of other cables in the future.</p> <p>This ensures compliance with Telecommunications Policy 2.</p>



<p>Telecommunications Policy 3</p>	<p>Preference should be given to proposals that protect submarine cables whilst achieving successful seabed user coexistence, such as the bundling of cables (electricity and communications) as well as pipelines for multiple activities where suitable. Proposals should specify if separate access to cables for the purposes of repair and maintenance is required. With regard to decommissioning redundant submarine cables, a risk-based approach should be applied with consideration given to cables being left in situ where this would minimise significant impacts on the physical, natural, societal, historic, and economic value of the area.</p>	<p>Yes</p>	<p>The Greenlink Interconnector is a submarine power cable, installed in 2025. The Beaufort cable route will cross the Greenlink Interconnector. However, the crossing will include pre-lay works that install an articulated concrete mattress over the crossing point of the Interconnector cable. The Beaufort cable will then be laid over the concrete mattress.</p> <p>A marine notice will be issued by the Fisheries Liaison Officer once the concrete mattresses have been installed to notify marine users. A Guard vessel will be positioned at the crossing location from the time of laying the cable until the completion of post-lay rock placement. Fishermen will be informed of the works, and the crossing locations and regular contact will be maintained with fishing fleets during this time.</p> <p>As a result, the proposed Beaufort cable laying methodology has been designed to prevent any potential cumulative effects with existing subtidal cables within the Irish EEZ.</p> <p>Decommissioning works and measures to repair are outlined in the accompanying rehabilitation schedule.</p> <p>This ensures compliance with Telecommunications Policy 3.</p>
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Telecommunications Policy 4	Proposals that ensure and enhance connectivity of Ireland's rural and island communities to high quality telecommunications networks should be supported.	Yes	The proposal enhances Ireland's connectivity as a whole. It will drive social, economic and industrial growth to enhance the southern region and even spread to benefit the nation. This ensures compliance with Telecommunications Policy 4.
Tourism Policies			
Tourism Policy 1	Where appropriate, proposals enabling, promoting or facilitating sustainable tourism and recreation activities, particularly where this creates diversification or additional utilisation of related facilities beyond typical usage patterns, should be supported.	No	Tourism Policy 1 is not relevant to the proposed development as the proposal is not designed to promote or facilitate sustainable tourism and recreation activities.
Tourism Policy 2	Proposals must identify possible impacts on tourism. Where a potential significant impact upon tourism is identified it should be demonstrated how the potential negative consequences to tourism in communities will be minimised. This must include assessment of how the benefits of proposals are not outweighed by potential negative impacts.	No	Tourism Policy 2 is not relevant to the proposed development as the proposal is not designed to impact tourism.
Tourism Policy 3	Proposals for tourism development should seek to optimise facilities and use of space by taking a cross-sectoral development approach that provides for multiple activities, whilst minimising the extent to which the proposal is likely to adversely impact	No	Tourism Policy 3 is not relevant to the proposed development as the proposal is not designed to develop tourism.



	on the natural environment.		
Wastewater Treatment and Disposal Policies			
Wastewater Treatment and Disposal Policy 1	<p>Proposals by Irish Water related to the treatment and disposal of wastewater that:</p> <ul style="list-style-type: none"> i) service the social and economic development of the country under the National Planning Framework; ii) resolve environmental issues at priority areas identified by the EPA; iii) contribute to the realisation of the objectives of: <ul style="list-style-type: none"> • Ireland’s River Basin Management Plan 2018 – 2021 • The Water Services Policy Statement 2018 – 2025 • Marine Strategy Framework Directive 2012 - 2020 <p>should be supported, provided they fully meet the environmental safeguards contained within relevant authorisation processes.</p>	No	Wastewater Treatment and Disposal Policy 1 is not relevant to the proposed development as the proposal has no impact on wastewater management or treatment.
Wastewater Treatment and Disposal Policy 2	Proposals that have the potential to significantly adversely affect existing	No	Wastewater Treatment and Disposal Policy 2 is not relevant to the proposed



	<p>and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for by Irish Water should not be authorised unless:</p> <ul style="list-style-type: none"> • compatibility with the existing, authorised, proposed or otherwise identified in consultations with Irish Water activity, can be satisfactorily demonstrated; • the proposal is clearly of strategic or national importance. <p>Where possible, proposals that may affect Irish Water activities or plans should engage with Irish Water at the earliest available opportunity.</p> <p>Compatibility should be achieved, in order of preference, through:</p> <ul style="list-style-type: none"> a) avoiding adverse impacts on those activities; and / or b) minimising impacts where they cannot be avoided; and / or c) mitigating impacts where they cannot be minimised. 		<p>development as the proposal has no impact on wastewater management or treatment.</p>
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