



APPENDIX 2-2

SCOPING RESPONSES

Keelin Bourke

From: Sheila Downes <SDownes@clarecoco.ie>
Sent: Wednesday 3 July 2024 15:21
To: Robert Kennedy
Cc: sheila.browne; Geraldine Enright
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from sdownes@clarecoco.ie. [Learn why this is important](#)

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Robert,

It's been some time since we have been in touch and subsequent to our pre-planning meeting last year Sceirde Rocks has been on my radar again for a couple of reasons. But I'm touching base today in terms of the photomontages that have been prepared which are extremely useful in the virtual consultation room. The view from Inis Mór in the context of the visual impact from the Cliffs of Moher is particularly useful as Clare County Council and the Cliffs of Moher Visitor Experience move into the finalisation of the Cliffs of Moher Strategy and the associated Masterplan. It would however be useful if there was a photomontage point from a selected location at the Cliffs of Moher or along the Cliffs of Moher pathway to allow the team to visualise the impact (if any) on this tourist site which is of national importance. A site at the viewpoint south of the Cliffs of Moher or at O'Brien's Towner or Hag's Head would be extremely useful .

I appreciate this will take time and resources but in terms of informing any future submission to the Planning Application from the Cliffs of Moher Visitor Experience it would be beneficial. I've copied in Geraldine Enright, Director and Sheila Browne, Project Co-Ordinator at the Cliffs of Moher Experience to this email as they are leading out on the preparation of both the Strategy and the Masterplan.

You might let us know at your convenience whether this would be possible or not,

Kind Regards
Sheila

innovision.s3.eu-west-1.amazonaws.com/Sceirde_Rocks_VPC/output_04/index.html

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:28 AM
To: Planning Office <planoff@clarecoco.ie>
Cc: enviroff <enviroff@clarecoco.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 3:50 PM
To: envirossoff <envirossoff@clarecoco.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Robert Kennedy

From: Brian Murphy <brmurphy@clarecoco.ie>
Sent: 19 October 2023 12:11
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from brmurphy@clarecoco.ie. [Learn why this is important](#)

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Hi Robert,
Apologies for the delayed response. I have reviewed the EIAR Scoping Report. I have no comments to add. I note the reference to Cable routes so an Outline Traffic Management Plan will be needed and any road openings/ Trenches will need to be agreed with the Area Engineer in terms of trench location and reinstatement. Also, In the case of haulage routes, this will need to be outlined in your planning application with Autotracking if necessary. Only if turbines are being transported on the roads in Clare.

Kind Regards,

Brian Murphy
Acting Assistant Engineer

Transportation & Road Design Office
Clare County Council, Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2
| M: 087 253 5913 | E: brmurphy@clarecoco.ie | W: www.clarecoco.ie

LOCAL AUTHORITY OF THE YEAR 2022



COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL



Tá an t-eolas atá sa ríomhphost seo, agus in aon cheangaltán leis, rúnda, agus is d'aird agus d'úsáid an fhaighteora nó na bhfaighteoirí amháin nó eintiteas ainmnithe thuas atá sé. Murar tusa faighteoir beartaithe an ríomhphost seo nó aon chuid de, níor chóir duit an teachtaireacht seo a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Más rud é gur trí bhotún a fuair tú an ríomhphost seo cuir sin in iúl don tseoltóir gan mhoill.

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From: Roads <roads@clarecoco.ie>
Sent: Thursday, October 19, 2023 11:40 AM
To: Brian Murphy <brmurphy@clarecoco.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Joanne Galvin
Clerical Officer
Roads & Transportation Department
Clare County Council, Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2
T: 065 6846312 | W: www.clarecoco.ie | E: roads@clarecoco.ie

LOCAL AUTHORITY OF THE YEAR 2022



COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:22 AM
To: Roads <roads@clarecoco.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 3:51 PM
To: roads@clarecoco.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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Robert Kennedy

From: Roger Woods <rwoods@cnam.ie>
Sent: 04 September 2023 09:21
To: Robert Kennedy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert

Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarms are not located close to any existing or planned FM transmission sites.

Regards

Roger

Senior Executive Engineer

My email address has now changed to rwoods@cnam.ie, please update your address book accordingly.

Tá mo sheoladh ríomhphoist athraithe anois go rwoods@cnam.ie, dá réir sin déan do leabhar seoltaí a uasdátú, le do thoil.

Coimisiún na Meán | 2-5 Plás Warrington, Baile Átha Cliath D02 XP29, Éire
Coimisiún na Meán | 2-5 Warrington Place, Dublin D02 XP29, Ireland
T: + 353 (0)1 644 1200 | rwoods@cnam.ie

Coimisiún
na Meán



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From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 3:05 PM
To: Roger Woods <rwoods@cnam.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

You don't often get email from rkennedy@mkofireland.ie. [Learn why this is important](#)

Mr Woods,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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Kind regards,

Robert Kennedy
Environmental Scientist

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9C Beckett Way, Park West
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Robert Kennedy

From: Info <info@irishlights.ie>
Sent: 04 September 2023 15:32
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert, I can confirm receipt, this was quarantined, then after being released ended up in the junk mail but eventually arrived today!

Best regards

Navigation & Maritime Services

Commissioners of Irish Lights
Harbour Road, Dun Laoghaire, Co. Dublin, Ireland

<http://www.irishlights.ie>

.....



.....
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From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 3:56 PM
To: Info <info@irishlights.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

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Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Melissa Lynch <Melissa.Lynch@irishlights.ie>
Sent: 05 October 2023 15:27
To: Robert Kennedy
Subject: Irish Lights - Meeting

You don't often get email from melissa.lynch@irishlights.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good Afternoon Robert,

My name is Melissa and I am the Navigation Support Officer at Irish Lights. I can confirm we have received Sceirde Rocks scoping report.

The E- Navigation and Maritime service team here at Irish Lights would like to set up a meeting with yourselves to meet the team and to discuss the report and any observations we have.

Do you have availability over the next few weeks for an online meeting?

Kind Regards,

Melissa Lynch

Navigation Support Officer

.....

M: +353 87 6650039

Commissioners of Irish Lights

Harbour Road, Dun Laoghaire, Co. Dublin, Ireland
A96 H500

<http://www.irishlights.ie>

.....



Commissioners of
IRISH LIGHTS

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Robert Kennedy

From: Planning Notifications <PlanningNotifications@DECC.gov.ie>
Sent: 01 September 2023 16:11
To: Robert Kennedy
Subject: Auto-Reply

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We acknowledge receipt of your email.

The Planning Advisory Division acts on behalf of the Department of the Environment, Climate and Communications with respect to its function as a statutory consultee within the planning system.

The Department provides observations in relation to County Development Plans, Local Area Plans and Strategic Environmental Assessments.

The Department does not provide observations for individual projects and developments.

As such, the Department will not provide observations on individual planning applications, Environmental Impact Assessments or any notification relating to an individual development.

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

Robert Kennedy

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: 04 September 2023 15:28
To: Robert Kennedy
Cc: Jason Kearney (Defence); Gillian Holden (Defence)
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Mr. Kennedy,

The Department of Defence wishes to acknowledge receipt of your e-mail below and the attached documentation. We will consult with the Defence Force's subject matter experts and we will revert in due course.

Please contact if you have any queries.

Best regards
Don

Don Watchorn

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 1 September 2023 16:14
To: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr Watchorn,

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Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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Fógra faoi Rúndacht: Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda. Is leis an duine / nó daoine sin amháin a bhfuil siad seolta chucu a bhaineann siad agus ní ceart iad a léamh ná a scaoileadh chuig aon tríú páirtí gan cead roimh ré ón Roinn Cosanta.

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Robert Kennedy
Environmental Scientist
MKO Limited
9C Beckett Way
Park West Business Park
Dublin 12
D12 XN9W

11 October 2023

Re: Sceirde Rocks Offshore Windfarm

Without Prejudice

Dear Mr. Kennedy,

I refer to your letter and e-mail, dated 01 September 2023, in relation to the proposed Sceirde Rocks Offshore Windfarm located between 5 km and 11.5 km off the coast of Connemara, Co. Galway.

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observation is made on a non-prejudicial basis, and is not intended to be used to rely on for a prospective planning application, nor is this observation to be relied on in the event of any commercial transaction pertaining to such lands and it is not to be relied on in the event of any contract exchange pertaining to same.

As a matter of practice, the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

Following consultations with the relevant Military authorities, the Department of Defence has nil observations at this juncture in time.

We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the pre-planning stage.

Nothing in the above observation shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.



Please contact me if you have any queries in this regard.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Don Watchorn', written over a horizontal line.

Don Watchorn
Property Management Branch
Department of Defence
Station Road
Newbridge
Co. Kildare W12 AD93

Ciarán Fitzgerald

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday 2 May 2024 11:37
To: Robert Kennedy
Cc: Keelin Bourke
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping - Dept ref G Pre00218/2023
Attachments: G Pre00218-2023 Sceirde Rocks.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Robert,

Please find attached the Department's observations on this referral.

Kind regards,
Joanne

Joanne Lyons
Higher Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigi an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Monday 29 April 2024 15:40
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Keelin Bourke <kbourke@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping - Dept ref G Pre00218/2023

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Dear Sir/Madam,

I am following up on the below correspondence regarding the proposed Sceirde Rocks Offshore Wind Farm and the previously issued scoping document. I was advised in a separate email that the Department's reference for this referral is G Pre00218/2023.

Can you please return any comments or feedback that you have on the Project at your earliest convenience as we approach our submission date for the EIAR and Planning Application.

If you have any other queries on the scoping document or the Project in general, please don't hesitate to contact me.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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From: Robert Kennedy
Sent: Thursday, October 19, 2023 9:50 AM
To: Housing Manager DAU <manager.DAU@npws.gov.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Mr. Hillis,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can you please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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From: Robert Kennedy
Sent: Friday, September 1, 2023 4:21 PM
To: manager.DAU@npws.gov.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Mr Hillis,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Our Ref: **G Pre00218/2023**

(Please quote in all related correspondence)

01/05/2024

MKO
9C Beckett Way
Park West Business Park
Dublin
D12 XN9W
Via email

Re: EIA Scoping Document for the Proposed Sceirde Rocks Offshore Wind Farm

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading(s).

Archaeology

The submission documents have been reviewed by the Underwater Archaeology Unit of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage which is the state body with responsibility for the protection and preservation of archaeological heritage, including underwater cultural heritage, in Ireland and its territorial waters. It has responsibility for, *inter alia*:

Implementing legislation in relation to the protection of monuments and sites, including historic wrecks and underwater archaeological sites.

Regulating archaeological excavations, use of detection devices for archaeological purposes, diving on historic wrecks and on underwater archaeological sites or for archaeological purposes.

Providing advice to planning authorities on development proposals (development plans, heritage plans and individual planning applications) that may have implications for the archaeological heritage.

The role of the NMS Underwater Archaeology Unit (UAU) is to manage and ensure the protection of underwater archaeological heritage. Where OWF projects are concerned, the brief spans underwater and intertidal archaeological heritage as well as marine/underwater built heritage. Terrestrial elements of OWF developments are dealt with by the Licencing and Planning Unit of the National Monuments Service and certain built heritage aspects are dealt



with by the National Built Heritage Service of the Department of Housing, Local Government and Heritage. Applications and consultations, which can include OWF pre-design scoping, various archaeological assessment reports, Underwater Archaeological Impact Assessment (UAIA) reports, EIAs and EIARs are received by the UAU through the Development Applications Unit (DAU).

OWF applications/consultations received are assessed and observations, submissions and recommendations for assessment and mitigation are issued to the relevant applicants/authorities. To ensure consistency, all planning consultations on OWF projects must be channelled through the DAU.

Assessment of consultations received may include a review for approval of UAIA reports, geophysical survey reports, archaeological assessment of geotechnical investigation reports, EIARs, test-excavations reports, built heritage assessments and other reports undertaken as part of the EIA process or for ongoing OWF projects.

- The Department vets all licence applications received, that is, detection device, underwater, excavation or Ministerial Consent applications, including submitted Method Statements (MSs) and requests for extensions. All licence applications should be sent to the archaeological licencing section of the NMS. The NMS will vet, discuss, and approve licence/consent applications and attendant MSs submitted.
- The NMS will review and may, if necessary, issue observations/comments/further requirements on archaeological reports received pertaining to licenced works.
- Further requirements will be issued by the Department, through the DAU.
- The NMS may carry out inspections of licenced archaeological works to ensure that they are being undertaken in compliance with the conditions of licences, consents and the methodologies described in their attendant method statements.
- The Department will review and provide feedback on all information submitted pertaining to OWF projects, including early or pre-design scoping documentation.
- The Department may be invited to attend pre-design scoping meetings and workshops to become better informed on a scheme, to discuss same and to engage with the main stakeholders.

It is noted there have been a series of prior engagements between the Department and the Sceirde Rocks OWF project design team and we would welcome further comprehensive engagement as the EIAR is being progressed. The Department has also submitted observations to Foreshore Investigative Licence Applications FS07161 and FS07543 these remain relevant.

Please note this submission provides general recommendations relating to the assessment of underwater cultural heritage for the EIAR and should not be taken to infer approval of the project by this Department. The Department will comment in detail on subsequent consultations and submissions.



Scope of Underwater Cultural Heritage in EIAR

In defining the scope of the EIAR it is vital that the entirety of what constitutes underwater cultural heritage is reflected in its content. The UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage defines underwater cultural heritage as ‘all traces of human existence having a cultural, historical or archaeological character which have been partially or totally under water, periodically or continuously, for at least 100 years such as:

- (i) sites, structures, buildings, artefacts and human remains, together with their archaeological and natural context;
- (ii) vessels, aircraft, other vehicles or any part thereof, their cargo or other contents, together with their archaeological and natural context; and
- (iii) objects of prehistoric character.’¹

The Historic and Archaeological Heritage Act provides for the enabling of ratification of the Convention.

In determining the scope of underwater cultural heritage in the EIAR it should be noted that Section 3.3.6 of the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (Environmental Protection Agency 2022, 32) states that EIAR Cultural Heritage chapters should contain the following:

Cultural Heritage

Archaeology

Known archaeological monuments

Areas of archaeological potential (including unknown archaeology)

Underwater archaeology

Architectural heritage

Designated architectural heritage

Other significant architectural heritage

Folklore and history

Designations or sensitivities

The Landscape

Landscape Appearance and Character

Landscape Context

Views & Prospects

Historical Landscapes’.

¹ <https://en.unesco.org/about-us/legal-affairs/convention-protection-underwater-cultural-heritage>



Furthermore, Section 3.6.4 of *Frameworks and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) document states in relation to the scope of archaeological assessments that they:

‘may, as appropriate, include documentary research, field-walking, examination of upstanding or visible features or structures, examination of existing or new aerial photographs or satellite or other remote sensing imagery, geophysical survey, topographical assessment, general consideration of the archaeological potential of the area or areas effected by a development based on their environmental characteristics, or archaeological testing.’

Section 1.1 of the same document specifically notes that

‘... date is not in itself a determinant of archaeological significance or interest. Any material remains which can contribute to understanding past societies may be considered to have an element of archaeological significance’.

Therefore, it is vital that the scope of an OWF EIAR needs to include the broadest gamut of underwater cultural heritage to be sufficiently accurate to provide a reliable reference against which effects of a project can be assessed. The following constitutes some of the key elements of underwater cultural heritage that require detailed assessment in the EIAR.

Wrecks

Ireland’s long and varied maritime history has bestowed extensive records for shipwrecks along its coast and offshore waters (and freshwater environments). With over 18,000 documented losses, shipwrecks are the most abundant type of underwater archaeological site found in Irish waters. Wrecks include ancient logboats and wooden sailing, fishing and trading vessels, steamships, ocean-liners and ships and submarines connected with both world wars. Many contain relic cargoes, objects and human remains.

The Underwater Archaeology Unit (UAU) has compiled an inventory of recorded historic wrecks - the Wreck Inventory of Ireland Database - for the coastal and inland waters of Ireland. Records from the database are available to view through the Department’s web site (<https://www.archaeology.ie/underwater-archaeology/wreck-viewer>). It is important to note that the Wreck Viewer displays only wrecks for which there is a recorded location and these are represented on the map canvas as red dots. Due to the nature of the available primary and secondary source material pertaining to wrecks, the vast bulk of these relate to the eighteenth-twentieth centuries, but this should not be taken to infer that losses belonging to earlier periods are not present. Similarly, wrecks with known locations account for only approximately 22% of the total number of records contained in the WIID; there is data held within the WIID on a large number of wrecks for which we have no precise recorded location, co-ordinate or known extent. Information on these wrecks is not displayed in the viewer but is available from the Wreck Viewer.



In compiling the EIAR it is vital, therefore, that all recorded (located and unlocated) losses from the study area and its environs are comprehensively assessed by reviewing the WIID, relevant primary and secondary archival sources, results of geophysical and bathymetric surveys, prior archaeological investigations, local information and other relevant sources in order to determine, as accurately as sources allow, the locations and attendant zones of potential, of all historic wrecks. Assessment should also include areas of high potential for previously unrecorded shipwreck sites within the OWF study area – eg. sandbanks, areas of high concentration of recorded wrecks.

Submerged prehistoric sites and palaeolandscapes

Submerged prehistoric landscapes are areas that were formerly dry land that have been submerged as a result of both long-term and short-term processes of environmental change, most commonly sea-level rise since the retreat of the British and Irish Ice Sheet c. 26 ka. Sea levels during the Last Glacial Maximum were as much as 40-16 m lower than the present day, exposing large areas of what is now sea to human habitation. Isostatic lift has also created raised beaches and relic sea caves that have provided contexts for early prehistoric archaeology.

Evidence of Ireland's drowned landscapes and settlements is distributed across the entire coastline and there are presently some fifty sites where submerged archaeological sites and/or objects have been documented. The relatively small number of sites is probably due to lack of research, as much as taphonomic issues. Identified sites are mainly intertidal find spots or small collections of flint artefacts but monuments are also represented. A small number of fully subtidal sites are known, generally from nearshore regions and consisting, with one exception, of isolated single finds. In addition, there are numerous areas of intertidal and sub-tidal submerged forest and peat deposits around the coast and drowned rivers/lakes.

Information on submerged archaeological sites and objects is available from a broad range of sources, including the RMP/SMR, published secondary sources, the topographical files of the National Museum of Ireland and from prior archaeological investigations. However, these sources are not exhaustive and detailed primary research and fieldwork is required to facilitate further identifications. Geophysical and geotechnical investigations undertaken for OWF projects have the potential to realise a large body of new information on submerged archaeological sites and landscapes and this requires integration into all such investigations. Submerged palaeolandscapes should be regarded as being of high archaeological potential and are of intrinsic archaeological significance due to the palaeoenvironmental evidence they contain. It is vital therefore that they are accorded comprehensive assessment in EIARs.

Maritime and coastal built heritage

Maritime and coastal built heritage requires comprehensive assessment in the compilation and content of the EIAR. This is particularly important in the optioneering and assessment of



locations where cable routes and their associated structures make landfall. As foci for trade routes historic coastal towns are typically associated with concentrations of historic wrecks and associated elements such as relic cargoes and anchors. Maritime trade required extensive port infrastructure including harbours, lighthouses and other navigation aids, piers and jetties, landing stages. Infill (such as dredged spoil) used to reclaim areas of former estuarine floodplain may retain cultural material, including archaeological objects, the remains of abandoned vessels ('hulks') and wrecks used as part of the reclamation process or buried in the underlying original sediments. Similarly, infrastructure relating to past economic exploitation of the coastal areas for fish, shellfish, sea-weed, salt and other natural resources necessitated infrastructure that leaves an archaeological and built heritage legacy in the form of, for example, fish traps, fish weirs, shell middens and kelp grids. The frequency of certain types of monuments and objects within a given landscape forming the study area for an OWF can be strong indicators of previously unknown sites and artefacts remaining within proposed project areas. Assessment of archaeological potential, therefore, is not just site specific but must also include the landscape within which monuments are located, including watercourses and coastal areas.

Many of the site-types noted above are included in the RMP/SMR and Record of Monuments and Places/Sites and Monuments Record, National Inventory of Architectural Heritage and Record of Protected Structures (for a given county), but there are also likely to be sites that have not been previously recorded in these sources and their identification requires specific research that utilises a range of archival source material (e.g. historic maps, historic aerial photographs, port records, oral histories, archaeological investigation reports) and field investigations such as intertidal surveys. An indicator of the potential for the occurrence of maritime heritage is also provided by the annual Excavations Bulletin which contains brief accounts of excavations conducted in Ireland each year; these reports are also at www.excavations.ie. Report references up to 2022 are searchable on the NMS Finding Aid spreadsheet and the reports can be requested from NM Archives. Information on occurrences of chance finds of archaeological objects is also a useful indicator of archaeological potential – information may be obtained from the National Museum, local museums, and primary and secondary archival sources.

Statutory Protections on Underwater Cultural Heritage

The Minister for Housing, Local Government and Heritage is charged under the National Monuments Acts 1930 to 2014 with a range of functions regarding the protection of monuments, wrecks and archaeological objects, including the regulation of activities that impact upon underwater cultural heritage. The 1987 Amendment Act directly addresses the protection of underwater archaeology, which can be particularly relevant to OWF projects. The Acts extend as a minimum to the whole area of the State, including inland and internal waters and the Territorial Sea (the "12 mile limit"). In addition, activities within what is known as the Contiguous Zone (the "24 mile limit") require compliance with the provisions of the legislation relating to legal protection for wrecks over 100 years old and underwater archaeological objects. In September 2023 the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 was signed into law by the President. It is envisaged that



the legislation will be commenced in the coming period but in the interim the National Monuments Acts 1930 to 2004 apply.

The provisions of the National Monuments Acts 1930 to 2014 that are applicable to the assessment, mitigation and construction stages of OWF projects include the following:

Works at or in relation to a site or monument recorded under Section 12 of the 1994 National Monuments (amendment) Act or registered under Section 5 of the 1987 National Monuments (amendment) Act must not take place unless two months' notice has been given to the Minister for Housing, Local Government and Heritage, except in cases of urgent necessity and with the consent of the Minister.

With very limited exceptions, all archaeological excavation (wherever occurring and regardless of whether directed at a known archaeological site or monument) requires an archaeological excavation licence under Section 26 of the National Monuments Act 1930, unless conducted under a Ministerial Consent under Section 14 of the 1930 National Monuments Act (where a proposed archaeological excavation requires a consent under Section 14 of the 1930 National Monuments Act, it will be dealt with under that section, and not under Section 26 of the 1930 National Monuments Act).

The diving on, survey of, or interference with, wrecks of 100+ years old or underwater archaeological objects requires a licence under Section 3 of the 1987 National Monuments Act.²

Wrecks that are less than 100 years old and the potential location of wrecks or underwater archaeological objects may also be protected under Section 3 of the 1987 National Monuments (amendment) Act by the placement of an underwater heritage order if the wreck, area, or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection.

The use of a detection device to search for archaeological objects (or the possession of such a device on a monument protected under the National Monuments Acts 1930 to 2014) is prohibited without a consent under Section 2 of the 1987 National Monuments (amendment) Act.

Section 2 of the 1987 National Monuments (amendment) Act prohibits the possession of a detection device (including geophysical survey equipment) in or at the site of a Recorded Monument or National Monument of which the Minister for Housing, Local Government and Heritage or a local authority is the owner or guardian, or which is subject to a Preservation Order under the National Monuments Acts.

² It should be also noted that many wrecks are also the last resting places of people who perished when the vessel was lost and they should, accordingly, be treated with the utmost respect within the context of OWF development proposals. This may include appropriate liaison with descendants and local communities.



The interference with, or alteration of ground, within, around, or in proximity to a National Monument of which the Minister for Housing, Local Government and Heritage or a local authority is the owner or guardian, or which is subject to a Preservation Order under the National Monuments Acts (and also ground disturbance around or in proximity to any such monument in state care), requires a consent under Section 14 of the 1930 National Monuments Act.

Finds of archaeological objects made other than during licensed archaeological excavations or underwater dive/surveys, or during activity carried out under a Section 14 1930 National Monuments Act consent, must be reported to the National Museum of Ireland (NMI) within 96 hours and must not interfered with (Section 23 of the 1930 National Monuments Act).

Alteration of an archaeological object requires a licence (Section 24 of the 1930 National Monuments Act).

The export of archaeological objects requires a licence under Section 49 (7) of the National Cultural Institutions Act 1997.

Applications for excavation, survey, dive/survey licences and detection consents should be made to the National Monuments Service.

Considerations in Archaeological Assessment of OWF Projects

OWF projects can have a significant effect on a broad range of underwater cultural heritage, which should be comprehensively addressed through the archaeological assessment process. An archaeological assessment and mitigation strategy for a proposed OWF project, including for design and geophysical and geotechnical investigations, and for enabling works and construction activities, should primarily aim to avoid or reduce effects on the underwater cultural heritage. The risk of adverse effects on underwater cultural heritage can be reduced through carrying out mitigation as early as possible and assessment should also inform the design of a given scheme with reasonable alternatives that achieve the maximum amount of preservation in situ of underwater cultural heritage.

Each phase of an OWF requires its own approach and strategy for archaeological assessment and mitigation. As each stage reaches completion, the archaeological strategy and mitigation in place may need to continue onto the next stage or be expanded in the event, for example, that new discoveries are made that warrant additional archaeological inputs. Assessment recommendations, with appropriate avoidance or mitigation measures, require implementation regardless of whether the assessment took place before or after a grant of approval for an OWF. As geophysical and geotechnical investigation works are generally undertaken before a project receives approval, they will require separate screening, assessment, and Section 12 of the National Monuments Act 1930 notification and monitoring, as set out in an assessment report to be submitted and agreed with the NMS.



For each OWF a detailed assessment of underwater cultural heritage, undertaken by suitably qualified and experienced specialists, is required during the pre-design and/or design phase, as part of the EIA process. The purpose of such assessments is to identify, describe and assess the likely significant effects on underwater cultural heritage resulting from, *inter alia*, the construction and operation of a project. This is to ensure that any significant adverse effects can be avoided, reduced or offset, and that mitigation measures can be embedded into the design, wherever possible.

Assessment should address direct and indirect effects on underwater cultural heritage, both positive and negative, and should include issues such as geophysical and geotechnical investigations, all enabling works, vibration, hydrological change, and any cumulative effects. In many cases, cumulative or indirect (secondary) impacts and enabling works may be more significant than direct impacts from a project. Similarly, impacts on the setting of archaeological monuments and on views to and from monuments arising from OWF projects should be assessed and mitigated, where necessary. This is particularly important where there is the potential for the setting of a World Heritage Site (or tentative list World Heritage Site) or National Monument, to be affected by an OWF project.³

Any interactions between impacts on underwater cultural heritage and other environmental factors should also be documented for each underwater cultural heritage asset and captured in a matrix of interactions (for example, an archaeological monument may have amenity value, which would need to be assessed under Population and Human Health in the EIAR). The description of effects should be precise and concise and focus on effects that are probable or likely to occur, including the reasonably foreseeable worst-case scenario. Discussion of negligible effects should be avoided.⁴ Assessment should also include a description of proposed mitigation measures for a given programme of works, consideration of a do-nothing scenario, and alternatives to avoid or reduce significant adverse effects.

Underwater Cultural Heritage in the EIAR

The EIAR chapter on Underwater Cultural Heritage should include a description of the full gamut of underwater cultural heritage (as described above), a synthesis of all prior investigations and assessments and a detailed impact statement and mitigation recommendations. Detailed final reports on all prior investigations should be included as appendices. The chapter should include, as a minimum, the following:

A synthesis of desktop study to include historical and cartographic research, research on primary and secondary archival sources, and the results of a review of the Wreck Inventory of Ireland Database, Record of Monuments and Places/ Sites and Monuments Record, National Inventory of Architectural Heritage and the Record of Protected Structures.

³ UNESCO Guidance on Wind Energy in World Heritage Context <https://whc.unesco.org/en/wind-energy/>

⁴ Further information on describing effects is given in the Environmental Protection Agency (EPA's) *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2022). Available for download at: <https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php>



A synthesis of all underwater surveys, intertidal surveys and any other assessments undertaken.

An inventory of all underwater cultural heritage assets, including wrecks, submerged palaeolandscapes, archaeological features/deposits, sites/monuments, or objects and marine built heritage. All sites should be accompanied by mapping with associated geospatial data; where possible, the full (known/predicted) extent of archaeology identified should be mapped using polygons. For ease of use each item, regardless of designation, should be numbered using a sequential system of identifiers.

A detailed Impact Statement, which includes drawings/mapping that clearly show impacts/effects, and recommendations for appropriate mitigation of any adverse impacts and effects to known or potential archaeological heritage.

OWF projects can lead to significant adverse effects on a broad range of underwater cultural heritage (see above), requiring comprehensive and proactive mitigation informed by a comprehensive archaeological assessment process. It is national policy, as set out in the *Frameworks and Principles for the Protection of the Archaeological Heritage* that ‘there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage’ and it is essential that this overarching, core principle is proactively embedded within the design process. Assessment and an attendant mitigation strategy should therefore aim to avoid or reduce effects on the underwater cultural heritage and inform the design of a given scheme with reasonable alternatives that achieve the maximum amount of preservation in situ. The risk of adverse effects on archaeological heritage, and attendant cost and delay implications for an OWF project progression, can be reduced through carrying out mitigation as early as possible and ideally in the design stage.

Each phase of an OWF requires its own approach and strategy for archaeological mitigation, as guided by the assessment. As each stage towards EIAR completion reaches completion, the archaeological strategy and mitigation in place may need to continue onto the next stage or be expanded in the event, for example, that new discoveries are made that warrant additional archaeological inputs.

Once the likely direct, indirect and cumulative impacts and effects on underwater cultural heritage have been identified and assessed, measures to mitigate any adverse effects should be devised and embedded within the overall EIAR. EIARs will include a Schedule of Environmental Commitments detailing specific measures to be undertaken to mitigate any adverse effects on underwater cultural heritage. The archaeological elements of the Schedule of Environmental Commitments should be reviewed in advance of EIAR submission to the planning authority by the Department as part of the consultative process. The Schedule of Environmental Commitments should comprise of a list of relevant measures that the OWF developer is obligated to undertake to mitigate adverse effects. It is in the developer’s interest to ensure that all undertakings to mitigate are fully understood and accepted and that the resources are available to ensure compliance with such commitments



(such as preservation in situ, test-excavations, monitoring, archaeological excavation, post-excavation requirements and, where relevant, publication of results and other forms of dissemination).

Mitigation by Avoidance ('Preservation in situ')

When no impact is caused, often through consideration of alternatives (that is, a design solution), mitigation by avoidance/preservation in situ is achieved. This is generally the most time- and cost-effective form of impact mitigation. Preservation in situ of underwater cultural heritage, and all cultural heritage assets, should be a primary objective of the archaeological heritage assessment component of OWF projects. This approach is embedded in the EIA process and across other established guidance, including the *UNESCO Convention on the Protection of the Underwater Cultural Heritage* and its Annex Rules and the *UNESCO 1992 Convention for the Protection of the Archaeological Heritage of Europe* (revised). It is also consistent with government policy as outlined in the *Framework and Principles for the Protection of the Archaeological Heritage* (DAHGI 1999, 33), which requires a presumption in favour of avoidance of impacts.

Mitigation by avoidance should occur, to the greatest extent possible, during the OWF project pre-design or design phases, when the presence, location, and extent of archaeological or other cultural heritage assets are known (such as recorded sites or those identified during SI works).

Avoidance will, in general, be designed into the OWF design at an early stage, and may require defined Archaeological Exclusion Zones, buffers, vibration monitoring and periodic inspection. The extent of an Archaeological Exclusion Zone is dependent on the character and extent of the underwater cultural heritage asset requiring its implementation and each case requires bespoke exclusion zones, based on the fullest understanding of the asset. For example, a 50m long wreck may have an extensive, 200m radius debris field associated with it. In order to protect it in its entirety an exclusion zone of 300m radius from the centre of the wreck will be required.

Whilst it is essential that the implementation of Archaeological Exclusion Zones will have been finalised as part of the EIA process, due to practical concerns it may be necessary to carry out additional, post-consent, investigations in order to facilitate preservation in situ of underwater cultural heritage. Investigations may be required in order to characterise and determine the full extent of an underwater cultural heritage asset. Such investigations may include further archival research, geophysical surveys, dive surveys, metal detection surveys, Remote Operated Underwater Vehicle surveys and underwater test-excavations. In addition, archaeological dive surveys may be required to ensure areas to be impacted upon by construction works and pre-lay grapnel runs are devoid of underwater cultural heritage. Where these mitigations are required they should be itemised clearly within the Schedule of Environmental Commitments.



Preservation in situ may also be used where archaeology discovered during construction can be preserved with suitable measures, such as changing the construction design, avoiding impacts using buffer zones, physical protection, once this is agreed with the NMS (and the NMI, where relevant). However, preservation in situ after the discovery of archaeological heritage within construction stage will normally require a variation to the design and construction, which can be costly and impact on the programme of works, and should therefore be avoided, where possible, through adequate prior archaeological assessments. This is particularly critical when dealing with sites underwater.

Mitigation by Remedy/Offsetting ('Preservation by Record', Archaeological Monitoring)

Mitigation by remedy/offsetting is achieved when an adverse effect is compensated for by a remedial action and balanced by a positive effect. For example, gaining and disseminating new knowledge of the past from archaeological excavation or carrying out conservation works on a maritime built heritage structure that is effected, can be considered as mitigation by remedy/offsetting.

Mitigation by remedy or offsetting may be the only option available for OWF projects that cannot avoid significant adverse effects on underwater cultural heritage due to their need to be located on a particular site or within a particular area. However, it is essential that all reasonable alternatives to adverse impacts are fully explored by the design team before this form of mitigation is proposed and it is advisable to consult with the National Monuments Service when this scenario arises.

The two forms of archaeological mitigation by remedy/offsetting are archaeological excavation ('preservation by record') and archaeological monitoring.

Archaeological Excavation ("Preservation by Record")

Where underwater cultural heritage, for example wrecks, submerged settlement sites or historic piers, require removal due to OWF development then it is essential that the approach of preservation by record be applied, i.e. that appropriate archaeological excavation and recording take place. Where adverse impacts on underwater cultural heritage cannot be avoided, a full excavation should be carried out to mitigate the impact of the works by preserving the archaeological remains to be impacted upon (with an appropriate buffer) by record.

Preservation by record is a mitigation of last resort and this principle is an important part of state policy in relation to archaeological heritage. Where underwater cultural heritage is concerned, archaeological excavation can be logistically complex, resource intensive and costly for both excavation and post-excavation phases of a project. Therefore, all reasonable options to avoid impacting upon underwater cultural heritage must be first considered, and only when these alternatives have been proven unviable in the judgement of the NMS will preservation by record be permitted. Before an approval is provided for full archaeological excavation the NMS will require sufficient evidence that all options for preservation in situ



have been exhausted. Mitigation relating to residual impacts of the excavation on remaining archaeological deposits/features/structures may also need to be addressed.

It is stated in the Department's *Policy and Guidelines on Archaeological Excavation* (1999),⁵ in all cases the proposed methods of excavation must be appropriate to the types of archaeology within the site and designed to maximise the amount of new knowledge of the past – the 'research dividend' - that can be obtained from the archaeological investigation. The methodology to be used in the excavation should be informed by any prior desk based study and assessments, field survey, and other investigations such as geophysical surveys, historical research, and archaeological test investigations.

The methodology for the excavation will require approval as part of the archaeological licensing process or Ministerial Consent process (National Monuments Acts 1930 to 2014). A licence must be applied for with a site-specific methodology that outlines the strategy to be employed during the proposed excavation. Such a strategy, as outlined in the Department's *Policy and Guidelines on Archaeological Excavation* (1999), should include (at a minimum) information under the following headings:

Archaeological and historical background to the proposed excavation.

Archaeological research priorities of the proposed excavation, based on prior research, historical and archaeological background.

The size, location, and scope of the proposed excavation.

The methods of underwater excavation envisaged, to include how the site will be excavated to maximise recovery methods (for example by hand-tools or by suction dredge with sieving of spoil on the surface). How structures/features/deposits/objects will be surveyed on site.

The proposed artefact-recovery strategy (metal detection is a standard requirement on all OWF related excavations) and how material will be safely recovered (in accordance with *Standards for the care and treatment of archaeological objects from excavations* (National Museum of Ireland, April 2022)).

Proposed sampling strategies and proposals for dealing with organic materials and human remains in the event of them being encountered.

Details on the size and experience of the underwater archaeological dive team.

How the site will be protected during downtime until excavation has been completed.

The proposed publication/public dissemination programme.

⁵ <https://www.archaeology.ie/sites/default/files/media/publications/excavation-policy-and-guidelines.pdf>



Archaeological Monitoring

Archaeological monitoring is generally undertaken following prior archaeological assessments being carried out for the EIAR/UAIA, with the objective of identifying and protecting previously unidentified underwater cultural heritage, archaeological deposits, features, structures, objects, wrecks, and other materials which may be encountered or otherwise affected by the OWF works.

As archaeological monitoring is generally undertaken during the construction programme, it is essential that it is not carried out as a primary means of mitigation but rather as a method of dealing with any residual risks to underwater cultural heritage that remain following the completion of prior assessments and mitigations. When archaeology is discovered during monitoring of construction works it can often lead to delays whilst the impacts are mitigated. It is critical that, where possible, detailed cultural heritage assessments and mitigations are carried out to identify and manage these risks. For OWF projects archaeological monitoring can include (but is not limited to):

Monitoring of sub-tidal/intertidal excavations of the seabed relating to construction activities.

Monitoring of geotechnical investigations.

Monitoring of dredging works.

Monitoring of dredged spoil through metal detection assessment.

Periodic/intermittent monitoring.

All archaeological monitoring should be carried out under licence. This will ensure that there are no avoidable delays arising from the subsequent application for a licence to mitigate the impacts of the development on any archaeology that may be discovered. If the impacted archaeology is under water, both a Section 26 (National Monuments Act 1930) licence and Section 3 (National Monuments Act (amendment) 1987) licence may be required (see Section 3.2).

In certain cases, the archaeological monitoring methodology for an OWF project should include the archaeological assessment of dredged/excavated spoil that is removed from the seabed. This material, particularly in proximity to urban areas, can be very rich in archaeological materials and objects, including organic materials. It is generally the approach of the Department, in consultation with the NMI, that dredged spoil is assessed by means of spreading, searching for objects, and metal detection (for metal objects). In order for artefacts to be accurately provenanced, where practicable, searching and metal detection should take place before bulk excavations occur, for instance where intertidal areas have been temporarily exposed. The following general approach is applied on a case-by-case basis, where dredged spoil is being removed off-site:



100% volume assessment of spoil – all spoil from areas being dredged within the Zone of Archaeological Potential for an historic town, within or in proximity of a wreck or of a Zone of Notification of a Recorded Monument, at or near a monument that is subject to Section 14 of the National Monuments 1930-2014 Acts, or in areas that are traditionally known to have high potential to contain underwater cultural heritage (e.g areas where there are concentrations of shipwrecks).

25% volume assessment of spoil from all other areas.

Scaling of assessment of dredged spoil. In general, the Department will consider the scaling up or down of 25% volume assessment of the dredged spoil based on the artefactual retrieval results over an agreed time.

Sufficient archaeological personnel need to be on site to monitor all aspects of works for an OWF project. To illustrate the need for adequate provision of competent and experienced personnel, and to highlight areas that need consideration when undertaking such work, archaeological monitoring of dredging/excavation operations may include some or all the following and may have some or all the associated requirements:

Underwater activities and requirements

Activity	Requirements
24-hour Monitoring	Sufficient archaeological personnel to cover monitoring works.
Archaeological Excavation	A full archaeological excavation/underwater team if the site/feature/object cannot be avoided following inspection.
Communications	A communications strategy to ensure that the plant operator will suspend dredging/excavations if potential archaeology is identified.
Dredged Spoil	Management of the archaeological team to assess dredged spoil.
Finds Recovery	A methodology to identify, locate, recover and record find locations; and to assess if the artefacts are associated with an archaeological site or are isolated finds.
High-level Management	Liaison with the developer, relevant consultants and service providers (project archaeologist, planning authority, works contractor, archaeological contractor, plant operators and own archaeological team).
Multiple Dredging Works	Multiple monitoring archaeologists.
Post-excavation Works	As per standards for all archaeological excavation, with added interpretation of underwater finds and discoveries. Specialist analysis and conservation for waterlogged finds.



Reporting	Dedicated Dredge Monitoring Report to form part of Final Report.
Team Management	Coordinating archaeological monitoring team to cover multiple plant and machinery; daily logs; regular reports.
Underwater Discovery and Mitigation	Rapid archaeological dive inspection by suitably qualified and experienced underwater archaeologists to assess archaeology and to secure site/feature/artefacts pending agreed further mitigation.
Waterlogged Material	Recovery of material that requires rapid first-aid and temporary storage in suitable holding tanks of water.
Offshore	Monitoring archaeologists should be on/near the dredge plant to monitor the works.

Follow-up Inspections

There may be a need for periodic follow-up inspections after the main works have been completed on an OWF project, as part of the agreed mitigation. These may be required to assess the effectiveness of certain mitigation measures that were put in place (for example, stabilisation mechanisms for underwater sites or features) or to inspect newly discovered sites/features/objects that were preserved in situ to ensure that no unforeseen residual impacts are occurring.

Project Archaeologist

As is recommended by this Department in relation to all substantive development schemes, such as the project in question, it is advised that the a Project Archaeologist(s) be appointed to oversee and advise on all aspects of this scheme from design, through EIAR compilation to construction.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford, Y35 AP90

Is mise, le meas

Joanne Lyons
Development Applications Unit
Administration

Robert Kennedy

From: EIAPanning <eiapanning@epa.ie>
Sent: 26 September 2023 15:13
To: Robert Kennedy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dr Mr Kennedy,
We acknowledge receipt of your correspondence in relation to the proposed Sceirde Rocks Offshore Wind Farm.

Please refer to the EPA website if you are looking for information on the Dumping at sea permitting process:
[Licensing & Permitting: Dumping at Sea \(DaS\) | Environmental Protection Agency \(epa.ie\)](#)

The Agency advises that a dumping at sea permit is required in the event that any deliberate disposal of a substance or material in the maritime area, as defined in Section 1 of the Dumping at Sea Act 1996 as amended, is proposed.

The email address for Dumping at Sea is licensing@epa.ie

For queries and correspondence relating to planning matters please contact eiapanning@epa.ie

Yours faithfully,
Environmental Licensing Programme

Environmental Licensing Programme
Office of Environmental Sustainability
An Clár um Cheadúnú Comhshaoil
Oifig um Inbhuanaitheacht Chomhshaoil



053-916 0600 (Switch)

eiapanning@epa.ie

www.epa.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 1 September 2023 16:47
To: EIAPanning <eiapanning@epa.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co.

Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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13th October 2023

Sceirde Rocks Offshore Wind Farm,
MKO,
Tuam Road,
Galway.
Co. Galway

By Email: rkennedy@mkofireland.ie

Re: Submission by Fáilte Ireland to the EIAR Scoping stage of the Sceirde Rocks Offshore Wind Farm

A Chara,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the invitation to make a submission in relation to the EIAR Scoping Report for the Sceirde Rocks Offshore Wind Farm

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

We have reviewed the EIAR Scoping report and note the methodology approach along with the comprehensive baseline included within the scope of the document. From a tourism perspective it is considered that the following areas are of most relevance and importance.

- Population and Human Health (including Socio-Economic, Tourism and Recreation).
- Coastal and Marine Infrastructure and Other Users.
- Seascape, Landscape and Visual Impacts.
- Shipping and Navigation; and
- Marine Archaeology and Cultural Heritage

Tourism and the Environment

There are two interactions between tourism and the environment - impacts *caused by* tourism projects and impacts *affecting* tourism. Regarding electricity generation / transmission planning

and development, it is anticipated that the majority of the interactions would occur as impacts affecting tourism.

Fáilte Ireland carries out annual visitor attitude surveys and the Fáilte Ireland's Overseas Holidaymakers' Attitudes to Ireland 2019 identifies the following, as the reasons tourists visit and enjoy Ireland:

- Interesting history and culture (84%)
- Plenty to see and do (89%)
- Beautiful scenery (91%)
- Natural, unspoilt environment (82%)
- Good range of natural attractions (84%)

It is noteworthy that beautiful scenery and natural attractions score highly as reasons for visiting Ireland. These factors are environmental and relate particularly to our landscape, coastal and rural areas.

Beautiful scenery – Particular attention needs to be given to effects on views from existing purpose-built tourism facilities, as well as views from touring routes, walking trails, scenic viewing points, greenways etc. have the potential to be particularly affected by infrastructure related developments which are located within viewing distance from the coast. Indeed, scale and sighting of individual and cumulative developments must also be taken into consideration.

Natural attractions – It is important to avoid any effects that may negatively impact local attractions and experiences.

Connemara Coast and Islands

The Connemara Coast and Islands are renowned for stories and folklore that highlight the unique landscape attributes, the resilience and vibrancy of coastal and island life, and the ways in which this area has been a source of artistic inspiration for centuries.

The Connemara Coast & Aran Islands Visitor Experience Development Plan (VEDP) 2023-2027 includes reference to the Gaelic Coast which refers to the vibrant area between Roundstone and Bearna and to the south of the N59.

“From scenic coastal villages such as Carna and Cill Chiaráin, through inlets and islands to Ceantar nOileán – visitors can experience one of Ireland’s most vibrant Gaeltacht regions where Gaeilge is the everyday language of its people. There is a strong link with the Aran Islands from this coast with ferries from Ros an Mhíl and light plane service from Inverin. An Spidéal to the east has an array of good restaurants, lively nightlife and sandy beaches.”

Relevant Experiences, Hero Products and supporting experiences along with experience gaps (and works underway to fill these gaps) as outlined in the Connemara Coast & Aran Islands VEDP 2023-2027 should be considered in the overall assessment of tourism impacts relating to the proposed Sceirde Rocks Offshore Wind Farm.

Furthermore, the Connemara Coast & Aran Islands (VEDP) 2023-2027 outlines that the

“The region is reliant on authentic community-based tourism enterprises to provide a wide range of visitor experiences. These community enterprises and local experiences deliver a wide range of economic, social, cultural and environmental benefits, together with ensuring a highly authentic experience for our visitors.”

It is crucial that the proposed EIAR undertakes full consideration of any associated potential impacts relating to community-based tourism projects and local experiences as detailed above.

Wild Atlantic Way & EuroVelo 1 – Atlantic Coast Route

The Connemara Coast stretching from Galway Bay to Killary Fjord, the Aran Islands and Inishbofin lie at the heart of Ireland’s Wild Atlantic Way. The region is a land of contrasts – its backdrop of the Twelve Bens and its extensive bog complex, its multiple peninsulas and inlets, and its unique islands all steeped in age-old Gaelic culture and tradition symbolise the essence of the Wild Atlantic Way and have inspired writers, artists and musicians over the centuries.

The Wild Atlantic Way – Regional Tourism Development Strategy 2023-2027 (extract below) outlines the particular emphasis on the ‘*crucial*’ need to protect and ensure any development both enhances and protects the wilderness of the landscape.

“Given that the tourism offering is largely based on the natural and built heritage, it is crucial that the quality, character and distinctiveness of these assets are protected, and any development enhances and protects the wildness of the landscape which is at the heart of its offering. We will also place a particular emphasis on the development and promotion of eco-tourism experiences.”

Also, while reference to the Wild Atlantic Way is included with the EIAR Scoping report, reference should also be made to any impacts relating to the EuroVelo 1 – Atlantic Coast Route. This EuroVelo 1 Cycling Route showcases the very best of our coastline and represents a valuable tourism product in attracting both overseas visitors as well as in encouraging domestic visitors to explore our Atlantic Coast. The EuroVelo 1 Cycling Route with regards to this submission is proximate to Ros an Mhíl before heading northwards along the R374 (see link). <https://en.eurovelo.com/ev1/celtic-coast>

It should be noted that direct and indirect tourism impacts relating to both the offshore array and landfall (grid connection) infrastructure should be considered in the EIAR.

Wild Atlantic Way Coastal Path

The Wild Atlantic Way Regional Tourism Development Strategy 2023-2027 outlines that:

“A framework will be developed to guide the creation of the Wild Atlantic Way Coastal Path through upgrading and enhancing existing coastal trails, and other planned initiatives such as looped driving routes and food trails will support the dispersal of visitors deeper into our Wild Atlantic Way communities”.

It is envisaged that existing coastal trails including in the immediate locality including the Gorumna Loop Walk (Luibín, Garumna) in Ceantar na nOileán, Inis Nee loop in Roundstone and the Moyrus Trail in Carna along with the Slí Chonamara (35km from an Spidéal to Ros an Mhíl:) would potentially comprise elements of this future WAW coastal path and merits consideration also within the EIAR.

Landscape & Visual

The Galway County Development Plan 2022-2028 will be a key consideration in the assessment of both onshore and offshore elements. In particular, the consideration of *“costal landscapes highly sensitive to change in appearance and character by new development of scale”* will require robust assessment. Provision should also be allowed for reference to the Clare County Development Plan 2023-2029 in the assessment of SLVIA.

Also, given the inclusion of a proposed SLVIA viewpoint location at Spiddal Pier (VP1) could a similar location across Galway Bay at Murrooghtoohey in the Burren, Co. Clare (Designated Heritage Landscape & WAW Discovery Point) be considered for potential impacts from here with more direct (albeit more distant) viewpoint?

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects

The purpose of these guidelines is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines. A copy of these has been attached to this submission. It is noted that these guidelines are referenced in the EIAR scoping report, it should also be noted that these were recently updated in July 2023 and attached with this submission.

Additional Studies & Guidance that may be useful as part of the EIAR Scoping process.

- Atlantic Offshore Wind Energy Development: Values and Implications for Recreation and Tourism, US Department of the Interior Bureau of Ocean Energy Management Office of Renewable Energy Programs.
- The Impact of Offshore Wind Energy on Tourism: Good Practices and Perspectives for the South Baltic Region.
- Sectoral marine plan for offshore wind energy: social and economic impact assessment scoping report: A.15. Tourism,
- Public Perceptions of Offshore Wind farm Developments in Scotland, Scottish Government, 2022
- Report On Visitor Awareness and Perceptions of The Irish Landscape, Fáilte Ireland, 2018
- Hynes, S., Aymelek, M., Norton, D., Tsakiridis, A. & Corless, R. (2020). A survey of domestic coastal and marine tourism and leisure activities in Ireland, SEMRU Report Series
- Survey of Marine and Coastal Overseas Tourism in Ireland, SEMRU NUIG, 2019

Conclusion

Fáilte Ireland recognises the importance of developing the State's renewable energy sector and transition to a low carbon energy. It is the policy of Fáilte Ireland to support the sustainable development of electricity generation by sustainable and renewable sources and support its contribution towards a sustainable energy supply at appropriate locations and in accordance with proper planning and sustainable development. However, given the geographical location of the Sceirde Rocks Offshore Windfarm (at its nearest located 5km from the coast) and the size and scale of the project proposed it is envisaged that significant tourism impacts may arise.

The inclusion of the assessment of tourism within the population and human health chapter is noted along with the tourism considerations referenced in the Seascape, Landscape and Visual Impact Assessment. However, given the sensitivities as outlined above in this submission it is considered that a standalone tourism impact assessment be undertaken to ensure the protection of "*the wildness of the landscape*" thereby aligning with the Overall Wild Atlantic Way Strategy.

We trust that the above will provide additional insights which will ensure that tourism and the potential impacts on tourism are adequately considered in the future steps/phases of the project. We thank you for your time and consideration of our submission. Please do not hesitate to contact us if you have any further queries to discuss our submission and/ or provide further information (e.g Current information to ensure robust baseline tourism environment).

Is mise le meas,



John Fallon
Officer – Environmental Engineering, Fáilte Ireland

Encl: EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects, July 2023, Fáilte Ireland.

Robert Kennedy

From: Karen Mannion <k.mannion@forumconnemara.ie>
Sent: 20 October 2023 07:39
To: Robert Kennedy
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

[You don't often get email from k.mannion@forumconnemara.ie. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Hi Robert,
Can you please give me a call at your convenience on 087-9635272.

Kind regards,
Karen Mannion

Sent from my iPhone



MEMO

Project Reference	220404 Sceirde Rocks Offshore Wind Farm
Time & Date	3 rd November 2023
Subject	FORUM Connemara
Author(s)	Rob Kennedy
Doc. file name	FORUM Connemara - Record of Scoping Phone Calls – 2023.11.03 - 220404

Item	Description
1.	20/10/2023: Karen Mannion, CEO of FORUM Connemara, replied to Scoping Document requesting callback.
2.	23/10/2023: Called Ms. Mannion who was unable to take the call at the time.
3.	3/11/2023: Called Ms. Mannion again at a more suitable time. She expressed great support for the Project and is of the opinion that it will be extremely beneficial to the Connemara region. She will respond to the Scoping Document via email to express the full support of FORUM Connemara. Upon submission of the application to An Bord Pleanála, she will make a formal submission on behalf of FORUM Connemara to further demonstrate their support for the Project.
4.	
5.	
6.	
7.	
8.	
9.	
10.	



Robert Kennedy

From: Customer Service <customerservice@galwaycity.ie>
Sent: 04 September 2023 09:23
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning,

Your email has been sent to the environment department for their direct review.

Regards,
Grainne

Customer Service
Galway City Council
City Hall
College Road
Galway
Phone: 091 536400



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 5:06 PM
To: Planning Department <planning@galwaycity.ie>
Cc: Customer Service <customerservice@galwaycity.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

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As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached.

Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Planning Department <planning@galwaycity.ie>
Sent: 04 September 2023 09:05
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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A Chara,

I wish to acknowledge receipt of your email. It has been forwarded to the relevant section for their attention.

Mise le meas

Aoife Keane | Aoife Ní Catháin

Planning Department | Rannóg Pleanála

Galway City Council | Comhairle Cathrach na Gaillimhe

City Hall, College Road, Galway, Ireland | Halla na Cathrach, Bóthar an Choláiste, Gaillimh, Éire

Phone: 091 536400 | **Email:** planning@galwaycity.ie

Planning applications and observations can now be submitted **online**.

To make a planning application online: [Local Government Ireland Planning System](#)

To make a submission on a planning application online: [Local Government Ireland Planning System](#)

To view planning applications online: [Select Search Type \(eplanning.ie\)](#)

For Enforcement queries please contact planningenforcement@galwaycity.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 5:06 PM
To: Planning Department <planning@galwaycity.ie>
Cc: Customer Service <customerservice@galwaycity.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Planning Department <planning@galwaycity.ie>
Sent: 04 September 2023 11:07
To: 'planning@galwaycoco.ie'
Cc: Robert Kennedy
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: EIAR Scoping Report - Sceirde Rocks OWF - Final - September 2023.pdf; Galway City Council - Planning - Scoping Consultee Letter - 2023.09.01 - 220404.pdf

You don't often get email from planning@galwaycity.ie. [Learn why this is important](#)

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A Chara,

Please see information attached and below.

Mise le meas

Aoife Keane | Aoife Ní Catháin

Planning Department | Rannóg Pleanála

Galway City Council | Comhairle Cathrach na Gaillimhe

City Hall, College Road, Galway, Ireland | Halla na Cathrach, Bóthar an Choláiste, Gaillimh, Éire

Phone: 091 536400 | **Email:** planning@galwaycity.ie

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To make a submission on a planning application online: [Local Government Ireland Planning System](#)

To view planning applications online: [Select Search Type \(eplanning.ie\)](#)

For Enforcement queries please contact planningenforcement@galwaycity.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>

Sent: Friday, September 1, 2023 5:06 PM

To: Planning Department <planning@galwaycity.ie>

Cc: Customer Service <customerservice@galwaycity.ie>; Órla Murphy <omurphy@mkoireland.ie>

Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Planning Department <planning@galwaycity.ie>
Sent: 19 October 2023 12:10
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert,
I have forwarded your email to our senior planners here in Galway City Council.

Kind regards,

June Joyce



Comhairle Cathrach na Gaillimhe
Galway City Council

Assistant Staff Officer / Oifigeach Foirne Cúnta
Planning Department / An Rannóg Pleanála
Galway City Council / Comhairle Cathrach na Gaillimhe
City Hall, College Rd, Galway / Halla na Cathrach, Bóthar an Choláiste, Gaillimh
Phone: 091 536578
Email: june.joyce@galwaycity.ie

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To make a submission on a planning application online: [Local Government Ireland Planning System](#)
To view planning applications online: [Select Search Type \(eplanning.ie\)](#)
For Enforcement queries please contact planningenforcement@galwaycity.ie

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:35 AM
To: Planning Department <planning@galwaycity.ie>
Cc: Jim Higgins <Jim.Higgins@galwaycity.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,

Rob

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:06 PM
To: planning@galwaycity.ie
Cc: customerservice@galwaycity.ie; Órla Murphy <omurphy@mkoireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Kind regards,

Robert Kennedy
Environmental Scientist

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Robert Kennedy

From: Roads <roads@GalwayCoCo.ie>
Sent: 04 September 2023 08:26
To: Robert Kennedy
Cc: CarraroeAdmin
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: EIAR Scoping Report - Sceirde Rocks OWF - Final - September 2023.pdf; Galway County Council - Roads Dept - Scoping Consultee Letter - 2023.09.01 - 220404.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Thank you for your correspondence.

This has been forwarded to the Local Area Office in Carraroe for their attention.

Regards,

Patricia Delaney
Infrastructure & Operations
Fire & Emergency Management
Tel (091) 509370

"This e-mail and any attachment contains information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorised to read, copy or use the e-mail or any attachment. If you have received this e-mail in error, please notify the sender by return e-mail and then destroy it."

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 1 September 2023 17:10
To: Roads <roads@GalwayCoCo.ie>; Roads and Services <roadsandservices@galwaycoco.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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Is é Microsoft , Arna Óstáil do Comhairle Contae na Gaillimhe, a rinne an teachtaireacht ríomhphost seo a scanadh agus a ghlanadh ó thaobh ábhair de. Tá míle fáilte roimh chomhfhreagras i nGaeilge nó i mBéarla. Tá eolas atá príobháideach agus rúnda sa ríomhphost seo agus in aon iatán a ghabhann leis agus is don seolaí amháin é. Mura seolaí thú,níl tú údaraithe an ríomhphost nó aon iatán a ghabhann leis a léamh, a chóipeáil ná a úsáid. Má tá an ríomhphost seo faighte agat trí dhearmad, cuir an seoltóir ar an eolas trí ríomhphost a sheoladh ar ais agus scríos ansin é le do thoil. Má tá an ríomhphost seo ag teastáil uait i bhformáid eile téigh i dteagmháil leis an duine a sheol chugat é. This e-mail message has been scanned for content and cleared by Microsoft Hosted for Galway County Council. Correspondence is welcome in Irish or in English. This e-mail and any attachment contains information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorised to read, copy or use the e-mail or any attachment. If you have received this e-mail in error, please notify the sender by return e-mail and then destroy it. If you need this email in an alternative format please contact the sender.

Robert Kennedy

From: DIG <Dig@gasnetworks.ie>
Sent: 04 September 2023 14:42
To: Robert Kennedy
Cc: Órla Murphy; Process Safety; Chris Dillon (C); Brian Steemers
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: Sceirde Offshore Windfarm Galway onshore.pdf; GNI Code of Practice for Working in Vicinity of Tx Network 2021.pdf; Safety Advice for working in the vicinity of Gas pipes 2021.pdf

You don't often get email from dig@gasnetworks.ie. [Learn why this is important](#)

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Robert,

The email below was forwarded on internally. Please send all such correspondence to us using the Dig@gasnetworks.ie address.

The only commentary that we have is in relation to the proposed onshore route in Galway, area of interest screenshotted below for reference. See attached pipeline drawing for this area. When you have more definite routes in Galway, please forward these for review also. We will issue smaller scale drawings at that stage. We have no pipeline assets in the onshore area in Clare or any of the offshore area highlighted in your EIAR Scoping Document.

Brian Steemers cc'ed is the main point of contact on electrical interference in GNI. Below points are the main items to consider when crossing transmission pipelines with electrical cables.

1. Any ducts crossing the pipeline would have to be installed as per the GNI Code of Practice (attached) with 600mm separation between services. We have not seen any detail around the duct crossing formation but if you have >1 AC cables at the crossing, then these must also be laid in a trefoil formation. The trefoil arrangement is primarily used in situations where the three phases are carried by individual cables rather than a single three phase cable and the magnetic field produced by each phase is cancelled out which reduces interaction of stray currents on the pipeline CP system. Crossings should be as close to perpendicular as possible with our pipelines to minimise interactions.
2. All works must be carried out in compliance with the attached Code of Practice with the salient points during the construction phase being wayleave demarcation & installing temp construction traffic crossing points if necessary.
3. Electrical interference assessment is required in line with ISO 21857. Electrical assessment would need to be carried out by the developer. This is a specialised assessment but one company I know that have done it in the past are <https://www.corroconsult.com/> & [CPCL](#) but others are available too. Costs for the electrical assessment & any works that may arise as the result of this assessment would have to be borne by the developer.
4. Please also refer to [Marcogaz WG TP-162](#) : General practices for managing risk increasing structures in the vicinity of high-pressure gas pipelines. This provides further background and guidance on the potential impact from high voltage cables on buried pipeline infrastructure and CP systems, and why interference assessment and mitigation measures may be required.

Standard response below when drawings are issued by GNI:

You recently contacted Gas Networks Ireland and requested information on its infrastructure in the vicinity of your forthcoming works. The Gas Transmission Pipeline in the general area of interest to you is shown, in **RED**, on the drawing attached. Please treat all Gas Networks Ireland Drawings as 'indicative' only.

The Gas Distribution Network in the vicinity is shown, in **GREEN** and/or in **BLUE** on the drawing attached. Please refer to the attached Safety Advice Booklet for guidance on working in the vicinity of this infrastructure.

To verify the in situ position of the Gas Transmission Pipeline please contact Chris Dillon, chris.dillon@gasnetworks.ie. All work in the vicinity of a Gas Transmission Pipeline must be completed in compliance with the attached 'Code of Practice 2021'.

The Gas Transmission Pipelines exist within Gas Networks Ireland Wayleaves. No excavation may take place within any such Wayleave unless consent, in the form of a valid Excavation Permit, has been granted by Gas Networks Ireland. Chris Dillon will issue this permit once all conditions for excavations have been met.

The Strategic Gas Distribution Main in this vicinity is highlighted in **BLUE** on the relevant GNI Drawing as attached. This must be treated as a Gas Transmission Pipeline and contact must be made with GNI prior to any excavation in the vicinity of same. All work in the vicinity of such must be completed in compliance with the attached 'Code of Practice 2021'.

There is some inert, redundant, GNI infrastructure in the vicinity as shown in **BLACK X-X** on the drawing attached. Your site crews should be made aware of same.

Aurora Telecom Ducts, where present, are shown as **MAUVE BROKEN LINES**. Please contact Aurora Telecom, at Auroralink@gasnetworks.ie for advice where Aurora Telecom infrastructure is present. The Aurora Emergency Number is 1800-42 7399

Screenshot of pg 5 of EIAR Scoping document showing onshore study area:



Regards,

Dónal Ó Caoimh

Senior Pipeline Safety Engineer

donal.ocaoimh@gasnetworks.ie

0872841209

Gas Networks Ireland,
P.O. Box 51, Gasworks Road,
Cork, Ireland. T12 RX96.



From: Robert Kennedy <rkennedy@mkoireland.ie>

Sent: Friday, September 1, 2023 5:17 PM

To: Networksinfo <Networksinfo@gasnetworks.ie>

Cc: Órla Murphy <omurphy@mkoireland.ie>; Press <press@gasnetworks.ie>; Marie Sheehan <Marie.Sheehan@gasnetworks.ie>

Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

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Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

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Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimisce the agus féadfar é a bheith neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmisce the na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire.

Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdraithe. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláráithe 555744 agus a tá hoifig chláráithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.



Robert Kennedy
MKO
Tuam Road
Galway H91 VW84

09 October 2023

Re: EIA Scoping Document for the Proposed Sceirde Rocks Offshore Wind Farm

Your Ref: 220404

Our Ref: 23/248

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 01 September 2023, concerning the EIA Scoping Document for the Proposed Sceirde Rocks Offshore Wind Farm, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Marine and Coastal Unit

Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages [INFOMAR](#), Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.

INFOMAR data such as bathymetry, backscatter, sediment classification, shipwrecks and survey metadata can be downloaded free of charge in a variety of formats at the INFOMAR Marine Data Download Portal:

<https://experience.arcgis.com/experience/9213db3d963d4f3cab3a220323d7cd4e/page/Page-1/?views=Download-Vector-Datasets>

Of particular interest to tourism is the extensive database of shipwrecks mapped by the INFOMAR programme, many lost close to the coast and with engaging human interest stories associated with them <https://www.infomar.ie/maps/story-maps/shipwrecks>.

INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment <https://www.infomar.ie/maps/downloadable-maps/maps>. [Story maps](#) have also been developed providing a different perspective of some of the bays and harbors of the Irish coastline. We would therefore recommend use of our Marine and Coastal Unit datasets available on our [website](#) and [Map Viewer](#).

The Marine and Coastal Unit also participate in coastal change projects such as [CHERISH](#) (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found [here](#).



Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audits for Co. Galway and Co. Clare were carried out in 2019 and 2005 respectively. The full report details can be found [here](#) and [here](#). **Our records show that there are CGSs within the vicinity of the Onshore Scoping Areas.**

Spanish Point, Co. Clare (GR 102489, 178198), under IGH theme: IGH 9 Upper Carboniferous and Permian. The coastal section at Spanish Point consists of well-bedded sandstones, siltstones and mudstones of the Upper Carboniferous (Namurian) Central Clare Group. This site is of National Importance and may be proposed as an NHA under the IGH 9 Upper Carboniferous and Permian theme of the GSI's IGH programme. Link to Site Report: [CE037](#)

Roevehagh M18 Road Cuts, Co. Galway (GR 144510, 219447), under IGH theme: IGH8 Lower Carboniferous. Road cuts excavated through limestone bedrock on the M18 motorway between Junction 17 Kiltiernan and Junction 18 at the M6 interlink. The sections are good representative exposures for the Burren Formation and Tubber Formation strata. Link to Site Report: [GY119](#).

Rahasane Turlough, Co. Galway (GR 147523, 219175), under IGH theme: IGH1 Karst. A major turlough on the Dunkellin River, south of Craughwell in the northern part of the Gort lowland karst area, on the southern margins of east Galway's limestone bedrock plains. Rahasane Turlough, despite being partially drained, displays all the hydrogeological characters of a major turlough. This is one of numerous sites broadly within the Gort-Kinvara lowlands which make up a complex of international importance. The site is recommended to NPWS for designation as a geological NHA, comprising one of 16 critical sites within the Gort-Kinvara lowland karst, which is one of the best studied lowland karst areas of the World. Link to Site Report: [GY118](#).

Caherateemore M17 Road Cut, Co. Galway (GR 146694, 233089), under IGH theme: IGH8 Lower Carboniferous. This site comprises an 800 m long road cutting along the M17 motorway, with both high and low cliffs of rock overlain by a veneer of glacial till. The rocks are limestones of Viséan age, from the Lower Carboniferous Period, part of the Burren Formation. The sections have been cut through a high hill, therefore forming some very high cliffs with spectacular bedrock exposure. Link to Site Report: [GY024](#).

Although the Sceirde Rocks Offshore Wind Farm project is in the early stages of planning, there may be potential impacts on the integrity of current CGSs envisaged by the proposed development, should these sites not be assessed as constraints. Ideally, the sites should not be damaged or integrity impacted or reduced in any manner due to the proposed development. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts.

Where the integrity cannot be preserved, we would ask that careful consideration be given in design to accommodating preservation of outcrops and /or subsoil exposures and access to the site during construction to record the exposures to strengthen our knowledge and datasets.

We would also ask that the design of any future development considers the use of information panels as appropriate to highlight the significance of any impacted CGSs. Please contact Geological Survey Ireland Planning Programme (GSIPlanning@gsi.ie) for further information and possible mitigation measures if applicable.



Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. **For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie).** Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Karst Viewer indicates numerous karst features in the Galway Onshore Scoping Area including turloughs, karst springs, swallow holes and enclosed depressions.

The Groundwater Data Viewer indicates aquifers classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Regionally Important Aquifer - Karstified (conduit)' underlie the Onshore Scoping Areas.

The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

There is a groundwater drinking water abstractions for which there are zones of contribution/source protection areas within the Galway Onshore Scoping Area:

- Carheenlea Group Water Scheme
- Brockagh Lisduff Group Water Scheme
- Rhynn Killeeneen Group Water Scheme
- GWDTE-Kiltiernan Turlough Group Water Scheme

Key to groundwater protection in general, and protection of specific drinking water supplies, is preventing ingress of runoff to the aquifer. Design of drainage will need to be cognisant of group water schemes and the interactions between surface water and groundwater as well as run-off. Appropriate design should be undertaken by qualified and competent persons to include mitigation measures as necessary, such as SUDs or other drainage mitigation measures. Note that there could be other groundwater abstractions in the locality for which Geological Survey Ireland has not undertaken studies, and a robust assessment should be undertaken by qualified and competent persons. Given the nearby drinking water sources, (Group Water Schemes and karst springs), the effects of any potential contamination as a result of the wind farm project would need to be assessed.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>**



Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information above.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our [Geotechnical Map Viewer](#). We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>.



Geophysical data

Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the [Tellus programme](#). These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at GSIPlanning@gsi.ie.

Yours sincerely,

Geoheritage and Planning Programme

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plan	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916dc0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?teasting=7&nothing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://www.epa.ie/enforcement/mines/
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

Notes:

- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
- Please read all disclaimers carefully when using Geological Survey Ireland data
- Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

Robert Kennedy

From: Gerry Leen <Gerry.Leen@hse.ie>
Sent: 04 September 2023 09:46
To: Robert Kennedy; PEHO Clare
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

You don't often get email from gerry.leen@hse.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning Robert,

Thank you for your email which I have forwarded to our National Office. They will log same and refer to the relevant sections of HSE for observations, including the Galway Environmental Health office.

Regards,
Gerry

*Gearóid Ó Léinn, Príomhoifigeach Sláinte Comhshaoil, An tSeirbhís Sláinte Comhshaoil, Feidhmeannacht na Seirbhíse Sláinte, Ionad 6 Páirc Ghnó Bothar Chuinche, Inis, Co. An Chlár.
Gerard Leen, Principal Environmental Health Officer, Environmental Health Service, Health Service Executive, Unit 6, Quin Road Business Park, Ennis, Co. Clare.*

Tel: 065 6706660 | gerry.leen@hse.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 1 September 2023 16:31
To: PEHO Clare <PEHOClaire@hse.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached.

Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Robert Kennedy

From: Gerry Leen <Gerry.Leen@hse.ie>
Sent: 20 October 2023 15:46
To: Robert Kennedy; PEHO Clare
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Robert,
You may remember that I referred your original email to our National Office.
I followed up this morning and was advised that Andrew Sulley from HSE Environmental Health will be in contact with you shortly.

Regards,
Gerry

*Gearóid Ó Léinn, Príomhoifigeach Sláinte Comhshaoil, An tSeirbhís Sláinte Comhshaoil, Feidhmeannacht na Seirbhíse Sláinte, Ionad 6 Páirc Ghnó Bothar Chuinche, Inis, Co. An Chlár.
Gerard Leen, Principal Environmental Health Officer, Environmental Health Service, Health Service Executive, Unit 6, Quin Road Business Park, Ennis, Co. Clare.*

Tel: 065 6706660 | gerry.leen@hse.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 19 October 2023 10:48
To: PEHO Clare <PEHOClaire@hse.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
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From: Robert Kennedy
Sent: Friday, September 1, 2023 4:31 PM
To: PEHOclare@hse.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

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Kind regards,

Robert Kennedy
Environmental Scientist

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9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Robert Kennedy

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: 01 November 2023 10:57
To: Robert Kennedy
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Robert,

This has been referred to the National Environmental Health Services Network Support Unit, for consideration. We are a specialist unit that considers large scale development and potential significant health implications on behalf of the HSE. We will liaise with Clare and Galway EHS where appropriate. We will also inform any other stakeholders in the HSE of the development and invite comments in their specialised areas.

The scoping has been referred to Public Health, HSE Estates, Health Protection and the appropriate Community Health Organisations within the HSE. We have not received any comments back from them. This e-mail can be a record for you that you have carried out a full HSE consultation at the scoping stage of the project.

Further communication should go to our unit and we will ensure that any stakeholders in the HSE are notified appropriately.

You can contact me directly at Andrew.sulley@hse.ie

I have been through the scoping document which is comprehensive. The likely significant impacts in the marine environment is a specialised area that is not within the HSE remit, so we will not be making any specific comments at the scoping stage for that.

The HSE will make comments around where the cabling comes onshore and the subsequent connections to the National Grid. We will make comments when the location has been agreed. The reason for this is that we will look at sensitive receptors and any likely significant impact on them, for example any health care premises or schools or private water supplies. Until we know where the onshore site is going to be located we cannot do this. We have a generic scoping report that we send to developers around use of the relevant guidance etc, but this is covered in detail in your scoping report so will not add any value to the scoping process at this stage.

We generally make a recommendation for a dedicated website for all the planning documents and Environmental Assessment and public consultation. The Local Authority planning websites are often difficult to navigate and I note your website at [Sceirde Rocks Windfarm | Powering Irish Communities](#) is addressing this.

In our experience the websites for large scale projects are often mainly used for consensus building for a project and don't always represent the public consultation accurately. Our unit look at every EIAR that is submitted in planning process in Ireland and we continually see the consultation process being used as consensus building and not meaningful

consultation. This inevitably leads to challenges to decisions further down the line and a significant number of legal challenges.

We are also encouraging and supporting additional health gain through large scale development as part of the EIA process. Particularly around opportunities for increasing access to green and blue spaces and opportunities for cycling and pedestrian access. We will make submission on this when we know the onshore route.

Do not hesitate to contact me if you need clarification on the content of this e-mail or need to discuss anything else around the role of the HSE as a statutory consultee in the EIA process.

Regards



Andrew Sulley
Senior Environmental Health Officer

Andrew Sulley
Environment and Climate Action Network Support Unit
National Environmental Health Services
Andrew.sulley@hse.ie

087 2913740

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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Ciarán Fitzgerald

From: Ciarán Fitzgerald
Sent: Tuesday 10 September 2024 12:50
To: Andrew.Sulley@hse.ie
Cc: Órla Murphy; Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Andrew,

Hope you're keeping well. I'm just following up on the below email thread for Robert. Just wondering if there's a more suitable way in which we can send you on the onshore cable route if security is blocking it. Let me know your thoughts?

Just to follow up on some of your questions below. The Community Report will be included in the application which will outline the consultation that took place. The EIAR application will have its own separate website as required by An Bord Pleanála. All documents relating to the EIAR application will be submitted here. This website is usually made closer to submission. We can let you know when this website is live.

If you have any further question, don't hesitate to reach out.

Le gach dea ghruí,
Ciarán.

Ciarán Fitzgerald
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Tuesday 14 May 2024 17:59
To: Robert Kennedy <rkennedy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Robert,

Thank you for the e-mail.

I cannot get past security on our Server to open the documents. I will therefore have to consider the route at the planning stage, which you state is imminent.

I cannot find any information on the bringing the energy onshore on the project website and the project timeline mentions nothing about environmental assessment or planning applications. The project map doesn't show the cable routes.

The virtual consultation section is useful but it basically seems to be selling the project, not actually consultation. The photomontages are very informative. Are the consultation outcomes going to be included in the EIAR? Would it be possible to have a planning section on the website with the EIAR and the planning application?

I'll await the full EIAR and make any observations that the National Environmental Health Service consider appropriate at that stage.

I will ensure the full application is referred to HSE stakeholders for any observations they might want to make.

Regards

Andrew Sulley



Andrew Sulley
Senior Environmental Health Officer

Andrew Sulley
Environment and Climate Change Network Support Unit
National Environmental Health Services
Andrew.sulley@hse.ie

087 2913740

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 18 April 2024 15:07
To: Andrew Sulley <Andrew.Sulley@hse.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Andrew,

I am following up on our below correspondence regarding the proposed Sceirde Rocks Offshore Wind Farm and the associated onshore cable route in Co. Clare. You mentioned providing the grid route when it became available, in order for the HSE to make further comments. Please find the grid route attached. Can you please return any comments or feedback at your earliest convenience as we are approaching our submission date for the EIAR and Planning Application.

If you have any other queries on the grid route or the project in general, please don't hesitate to contact me.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Thursday, November 2, 2023 6:02 PM
To: Andrew Sulley <Andrew.Sulley@hse.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Andrew,

Many thanks for your response, and I note your comments below. I will contact you when further details on the onshore cable route are available.

Kind Regards,
Robert

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Wednesday, November 1, 2023 10:57 AM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Robert,

This has been referred to the National Environmental Health Services Network Support Unit, for consideration. We are a specialist unit that considers large scale development and potential significant health implications on behalf of the HSE. We will liaise with Clare and Galway EHS where appropriate. We will also inform any other stakeholders in the HSE of the development and invite comments in their specialised areas.

The scoping has been referred to Public Health, HSE Estates, Health Protection and the appropriate Community Health Organisations within the HSE. We have not received any comments back from them. This e-mail can be a record for you that you have carried out a full HSE consultation at the scoping stage of the project.

Further communication should go to our unit and we will ensure that any stakeholders in the HSE are notified appropriately.

You can contact me directly at Andrew.sulley@hse.ie

I have been through the scoping document which is comprehensive. The likely significant impacts in the marine environment is a specialised area that is not within the HSE remit, so we will not be making any specific comments at the scoping stage for that.

The HSE will make comments around where the cabling comes onshore and the subsequent connections to the National Grid. We will make comments when the location has been agreed. The reason for this is that we will look at sensitive receptors and any likely significant impact on them, for example any health care premises or schools or private water supplies. Until we know where the onshore site is going to be located we cannot do this. We have a generic scoping report that we send to developers around use of the relevant guidance etc, but this is covered in detail in your scoping report so will not add any value to the scoping process at this stage.

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We are also encouraging and supporting additional health gain through large scale development as part of the EIA process. Particularly around opportunities for increasing access to green and blue spaces and opportunities for cycling and pedestrian access. We will make submission on this when we know the onshore route.

Do not hesitate to contact me if you need clarification on the content of this e-mail or need to discuss anything else around the role of the HSE as a statutory consultee in the EIA process.

Regards



Andrew Sulley
Senior Environmental Health Officer

Andrew Sulley
Environment and Climate Action Network Support Unit
National Environmental Health Services
Andrew.sulley@hse.ie

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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Robert Kennedy

From: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Sent: 19 October 2023 11:53
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Rob,
Thank-you for your email.

The offshore scoping areas and the onshore area in West Clare are all remote from the railway so we have no comments to make on these.

The onshore scoping area near Galway is bisected by the Athenry to Galway Railway line so please consult us about any proposed construction works within 100m of the railway.

Please also bear in mind that should the grid connection for the proposed development be planned to cross railway property then the developer must enter into a wayleave agreement with Iarnród Éireann and CIÉ for the crossings. It is unclear from the documents submitted whether a route is planned for the grid connection or if any development is proposed in the vicinity of the railway line.

Regards,

Colin Hedderly

Senior Track & Structures Engineer, Iarnród Éireann/Irish Rail, CCE Dept,
Old Railway Station, Grace Road, Athlone, Co. Westmeath, N37 C573.

Mobile: 087 9681735 E-mail: colin.hedderly@irishrail.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 10:49 AM
To: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr. Hedderly,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:34 PM
To: colin.hedderly@irishrail.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Mr Hedderly,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Ciarán Fitzgerald

From: Robert Kennedy
Sent: Friday 22 November 2024 16:33
To: Ciarán Fitzgerald
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Best regards,
Robert

Robert Kennedy
Project Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Transport Maritime Strategy and Governance Division <MSGD@transport.gov.ie>

Sent: 30 November 2023 13:00

To: Robert Kennedy <rkennedy@mkoireland.ie>

Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Good Afternoon Robert,

Apologies for the delay in replying to your request. Please see reply below from IRCG.

Regards,
Angela

From: Conor Kelly (IRCG) <Conor.Kelly@transport.gov.ie>
Sent: Thursday 30 November 2023 12:11
To: Transport Maritime Strategy and Governance Division <MSGD@transport.gov.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Good afternoon,

My apologies for the delay in replying.

Please see comments below from IRCG.

The EIAR scoping report does not take into account the contents of the National Maritime Oil/HNS Spill Contingency Plan and the National SAR plan which can be found on the links below. Suggest that the EIAR report is updated to include and take account of the contents of the plans.

<https://www.gov.ie/en/publication/79e5d-national-maritime-oilhns-spill-contingency-plan-nmoscp/>

<https://www.youtube.com/watch?v=WjqMsimyNLc>

<https://www.gov.ie/en/publication/856af1-the-national-search-and-rescue-plan/?referrer=http://www.gov.ie/en/publication/856af1-the-national-search-and-rescue-plan-2019/>

Kind Regards
Conor

Conor Kelly
Operations & Training Officer
Preparedness, Response & Planning Section
Irish Coast Guard

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 678 3478
Conorkelly@transport.gov.ie www.gov.ie/transport

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 19 October 2023 10:52
To: Transport IRCG DIVISION <admin@irishcoastguard.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:37 PM
To: admin@irishcoastguard.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Keelin Bourke

From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Monday 24 June 2024 10:13
To: Robert Kennedy
Cc: Padraic O'Malley; Jane Gilleran; Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Importance: High

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Thanks Robert,

Emails and attachments now received. Future consultations are best sent direct to the relevant IFI Environmental Officer ([Main Office Areas](#) | [Main Office Areas](#) | [IFI Open Data Portal \(arcgis.com\)](#)).

I have also copied in my colleague FEO Jane Gilleran as Doonbeg, Co Clare forms part of her operational area.

Could you confirm what stage the planning application is at and the deadline for submissions?

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • ☎ +353 (0)91 563118 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



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From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, June 21, 2024 5:06 PM
To: David Harrington <David.Harrington@fisheriesireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

Apologies for the delay in getting back to you. Attached is the initial email that was sent to IFI Galway. The same email was also sent to the main mailbox. I will follow up with the scoping document in a separate email, as it is too large to attach here.

The project has progressed significantly since scoping was first issued, and the grid connection option at Cashla substation referenced in the scoping document is no longer under consideration. The grid connection cable will now come ashore near Doonbeg in Co. Clare and connect to the national grid at Moneypoint.

More up to date information can be found on the project's website, including virtual consultation rooms - <https://www.sceirderockswindfarm.ie/>

Please let me know if you need any additional information.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Thursday, June 6, 2024 11:02 AM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Importance: High

You don't often get email from david.harrington@fisheriesireland.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert,

Could you send on the original email and referenced attachment to my email please for review.

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • ☎ +353 (0)91 563118 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



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From: Galway Info <Galway@fisheriesireland.ie>

Sent: Thursday, June 6, 2024 10:56 AM

To: David Harrington <David.Harrington@fisheriesireland.ie>; Galway Info <Galway@fisheriesireland.ie>; Collette Higgins <Collette.Higgins@fisheriesireland.ie>

Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

I have searched the Galway Info email and the only other email I can find is the email dated 31.05.24 below.

Anna.

From: David Harrington <David.Harrington@fisheriesireland.ie>

Sent: Thursday, June 6, 2024 10:21 AM

To: Galway Info <Galway@fisheriesireland.ie>; Collette Higgins <Collette.Higgins@fisheriesireland.ie>

Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Collette,

Have you the original email and referred attachment as it doesn't appear to have been sent to me?

Thanks,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • 📱 087 2379906 • ☎ 091 865177 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



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Inland Fisheries Ireland



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To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: Galway Info <Galway@fisheriesireland.ie>

Sent: Tuesday, June 4, 2024 9:41 AM

To: David Harrington <David.Harrington@fisheriesireland.ie>; Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>

Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Guys,

Not sure if ye spotted this or if you have any feedback for Rob?

Collette

From: Robert Kennedy <rkennedy@mkoireland.ie>

Sent: Friday, May 31, 2024 2:48 PM

To: Galway Info <Galway@fisheriesireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

I wish to again follow up on the below emails in relation to the Scoping Document for the proposed Sceirde Rocks Offshore Wind Farm. I would like to kindly remind you that we first attempted to issue the document for IFI's consideration and feedback in early September 2023, and to date we have received no feedback from IFI.

We are keen to get IFI's feedback on this project as soon as possible as we approach our lodgement of the application to An Bord Pleanála. If you have any comments or feedback, can you please respond at your earliest convenience.

Many thanks.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Thursday, October 19, 2023 10:55 AM
To: galway@fisheriesireland.ie
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:38 PM
To: galway@fisheriesireland.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Ciarán Fitzgerald

From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Tuesday 17 September 2024 15:53
To: Ciarán Fitzgerald
Cc: Rachel Cooper; Robert Kennedy; Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Ciarán,

I expect to have a response finalised by the weeks end.

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • ☎ +353 (0)91 563118 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



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From: Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Sent: Tuesday 17 September 2024 10:58
To: David Harrington <David.Harrington@fisheriesireland.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Rachel Cooper <Rachel.Cooper@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

I'm just following up on the email below. Just wondering when we might expect your response as we're trying to collate all our scoping responses at the moment. Thanks a million.

Le gach dea ghuí,
Ciarán.

Ciarán Fitzgerald
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611



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From: Ciarán Fitzgerald

Sent: Tuesday 3 September 2024 09:41

To: David Harrington <David.Harrington@fisheriesireland.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Rachel Cooper <Rachel.Cooper@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

Thanks for getting back to me. The letter can be addressed to Robert Kennedy of MKO and the application is proposed to be submitted in Q4 of 2024 so before the end of the year.

If you have any other questions don't hesitate to ask.

Le gach dea ghuí,

Ciarán.

Ciarán Fitzgerald

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

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From: David Harrington <David.Harrington@fisheriesireland.ie>

Sent: Tuesday 3 September 2024 09:31

To: Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Rachel Cooper <Rachel.Cooper@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>

Subject: Re: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Good morning Ciaran,

IFi are in the process of finalising our observations regarding same. Could you please advise whom the letter should be addressed to within MKO.

I'd also appreciate if you could confirm when the application is expected to be lodged with An Bord Pleanála.

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer
Western River Basin District - Galway

Iascach Intíre Éireann
Inland Fisheries Ireland
Teach Breac
Earl's Island
Galway
H91 K6D2

Tel [+353 \(0\)91 563118](tel:+353091563118)
Email david.harrington@fisheriesireland.ie
Web www.fisheriesireland.ie

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David Harrington
Senior Fisheries Environmental Officer

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The banner features the Inland Fisheries Ireland logo on the left, which consists of a stylized fish and the text 'Iascach Intíre Éireann Inland Fisheries Ireland'. In the center is a circular inset image of a woman talking on a mobile phone. On the right, the text 'beolín / hotline' is above the large number '0818 34 74 24'. Below this number, it says 'Oscailte 24 uair an lá / 7 lá in aghaidh na seachtaine' and 'Open 24 hours a day / 7 days a week'.

Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

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From: Ciarán Fitzgerald <cnfitzgerald@mkofireland.ie>
Sent: Tuesday, September 3, 2024 9:07:52 AM
To: David Harrington <David.Harrington@fisheriesireland.ie>
Cc: Robert Kennedy <rkennedy@mkofireland.ie>; Rachel Cooper <Rachel.Cooper@fisheriesireland.ie>; Órla Murphy <omurphy@mkofireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

Hope all is well? I'm just following up on this email for Robert. Just wondering if you've had a chance to review this further. Thanks a million.

Le gach dea ghuí,
Ciarán.

Ciarán Fitzgerald
Graduate Environmental Scientist

MKO

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From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Wednesday, July 24, 2024 12:41 PM
To: Robert Kennedy <rkennedy@mkofireland.ie>
Cc: Órla Murphy <omurphy@mkofireland.ie>; Rachel Cooper <Rachel.Cooper@fisheriesireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Robert,

IFI are currently reviewing the proposed development with a view to having a response compiled in the coming weeks.

We have also liaised with An Bord Pleanála regarding the application.

Kind regards,

David

David Harrington
Senior Fisheries Environmental Officer



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From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, July 19, 2024 2:27 PM
To: David Harrington <David.Harrington@fisheriesireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>; Jane Gilleran <Jane.Gilleran@fisheriesireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

We are still at pre-planning and expect to submit the application to An Bord Pleanála in the coming weeks. We welcome any feedback or responses to the scoping document at your earliest convenience.

Regards,
Rob

Robert Kennedy
Project Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W

Offices in Galway and Dublin
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From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Monday, June 24, 2024 10:13 AM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>; Jane Gilleran <Jane.Gilleran@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Importance: High

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Thanks Robert,

Emails and attachments now received. Future consultations are best sent direct to the relevant IFI Environmental Officer ([Main Office Areas](#) | [Main Office Areas](#) | [IFI Open Data Portal \(arcgis.com\)](#)).

I have also copied in my colleague FEO Jane Gilleran as Doonbeg, Co Clare forms part of her operational area.

Could you confirm what stage the planning application is at and the deadline for submissions?

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • ☎ +353 (0)91 563118 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



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From: Robert Kennedy <rkennedy@mkoireland.ie>

Sent: Friday, June 21, 2024 5:06 PM

To: David Harrington <David.Harrington@fisheriesireland.ie>

Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>; Órla Murphy <omurphy@mkoireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

Apologies for the delay in getting back to you. Attached is the initial email that was sent to IFI Galway. The same email was also sent to the main mailbox. I will follow up with the scoping document in a separate email, as it is too large to attach here.

The project has progressed significantly since scoping was first issued, and the grid connection option at Cashla substation referenced in the scoping document is no longer under consideration. The grid connection cable will now come ashore near Doonbeg in Co. Clare and connect to the national grid at Moneypoint.

More up to date information can be found on the project's website, including virtual consultation rooms - <https://www.sceirderockswindfarm.ie/>

Please let me know if you need any additional information.

Regards,
Rob

Robert Kennedy
Environmental Scientist

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From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Thursday, June 6, 2024 11:02 AM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Importance: High

You don't often get email from david.harrington@fisheriesireland.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert,

Could you send on the original email and referenced attachment to my email please for review.

Kind Regards,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • ☎ +353 (0)91 563118 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species.
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: Galway Info <Galway@fisheriesireland.ie>
Sent: Thursday, June 6, 2024 10:56 AM
To: David Harrington <David.Harrington@fisheriesireland.ie>; Galway Info <Galway@fisheriesireland.ie>; Collette Higgins <Collette.Higgins@fisheriesireland.ie>

Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi David,

I have searched the Galway Info email and the only other email I can find is the email dated 31.05.24 below.

Anna.

From: David Harrington <David.Harrington@fisheriesireland.ie>
Sent: Thursday, June 6, 2024 10:21 AM
To: Galway Info <Galway@fisheriesireland.ie>; Collette Higgins <Collette.Higgins@fisheriesireland.ie>
Cc: Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Collette,

Have you the original email and referred attachment as it doesn't appear to have been sent to me?

Thanks,

David

David Harrington
Senior Fisheries Environmental Officer

✉ David.Harrington@fisheriesireland.ie • 📞 087 2379906 • 📞 091 865177 • 🌐 www.fisheriesireland.ie • 🏠 H91 E2A2



At Inland Fisheries Ireland, we work flexibly. I'm sending this message now because it suits my work hours. I don't expect that you will read this message outside of usual hours. If you have any concerns or feel overwhelmed or need further support please consider visiting our Employee Support Spectrum which can offer you or your family support on any personal or work related issues.

To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: Galway Info <Galway@fisheriesireland.ie>
Sent: Tuesday, June 4, 2024 9:41 AM
To: David Harrington <David.Harrington@fisheriesireland.ie>; Padraic O'Malley <Padraic.O'Malley@fisheriesireland.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hi Guys,
Not sure if you spotted this or if you have any feedback for Rob?
Collette

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, May 31, 2024 2:48 PM

To: Galway Info <Galway@fisheriesireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

I wish to again follow up on the below emails in relation to the Scoping Document for the proposed Sceirde Rocks Offshore Wind Farm. I would like to kindly remind you that we first attempted to issue the document for IFI's consideration and feedback in early September 2023, and to date we have received no feedback from IFI.

We are keen to get IFI's feedback on this project as soon as possible as we approach our lodgement of the application to An Bord Pleanála. If you have any comments or feedback, can you please respond at your earliest convenience.

Many thanks.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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From: Robert Kennedy
Sent: Thursday, October 19, 2023 10:55 AM
To: galway@fisheriesireland.ie
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:38 PM
To: galway@fisheriesireland.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Robert Kennedy

From: Christophe O'BRIEN <Christophe.O'BRIEN@IAA.ie>
Sent: 11 September 2023 10:11
To: Robert Kennedy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Some people who received this message don't often get email from christophe.o'brien@iaa.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning Robert,

Can you please forward your email and associated documentation to: planning@iaa.ie and it will be reviewed in due course.

Best Regards,

Christophe

Christophe O'Brien

Aerodromes Inspector

M: +353 (0) 86 33 22022 |

E: obrienc@iaa.ie | www.iaa.ie

The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449



ÚDARÁS EITLÍOCHTA NA hÉIREANN
IRISH AVIATION AUTHORITY

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday, September 1, 2023 5:42 PM
To: Christophe O'BRIEN <Christophe.O'BRIEN@IAA.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr O'Brien,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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=====

Robert Kennedy

From: Planning <planning@iaa.ie>
Sent: 19 October 2023 14:14
To: Robert Kennedy
Cc: Planning
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Robert,

Scoping report and the request for IAA comment is received with thanks.
The request is currently under review and we will revert in due course.

Kind regards,

Dave

David McCann

Aerodromes Inspector

M: +353 1 603 1039 |

E: david.mccann@iaa.ie | www.iaa.ie

The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449



IRISH AVIATION AUTHORITY
ÚDARÁS EITLÍOCHTA NA HÉIREANN

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: 19 October 2023 10:56
To: Planning <planning@iaa.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

*** This message originated from outside the Irish Aviation Authority. Please treat hyperlinks, attachments and instructions in this email with caution. ***

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Thursday, September 14, 2023 4:51 PM
To: planning@iaa.ie
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Hello,

I was advised by Christophe O'Brien that this email address is more appropriate to contact regarding the Sceirde Rocks Offshore Wind Farm Scoping document. Please see below email and attached documentation.

Many thanks,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:42 PM
To: obrienc@iaa.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Mr O'Brien,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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company

=====

Robert Kennedy

From: Irish Peatland Conservation Council <bogs@ipcc.ie>
Sent: 19 October 2023 15:00
To: Robert Kennedy
Subject: Re: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Robert,

Apologies we haven't had a chance to look at this yet, but it is on the list of things to do.

Thanks

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

045 860133

bogs@ipcc.ie

CHY6829

Registered Charity Number 20013547

Visit <http://www.ipcc.ie> to learn all about the Save the Bogs Campaign or to arrange your visit to the Bog of Allen Nature Centre

On 19 Oct 2023, at 10:56, Robert Kennedy <rkennedy@mkoireland.ie> wrote:

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO

<image001.jpg>

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From: Robert Kennedy
Sent: Friday, September 1, 2023 5:44 PM
To: bogs@ipcc.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

<image001.jpg>

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Business Park, Dublin, D12 XN9W

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<EIAR Scoping Report - Sceirde Rocks OWF - Final - September 2023.pdf><Irish Peatland Conservation Council - Scoping Consultee Letter - 2023.09.01 - 220404.pdf>



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293

Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133

e-mail/riomhphost: bogs@ipcc.ie

web/idirlíon: www.ipcc.ie

Robert Kennedy - Environmental Scientist

18th December 2023

McCarthy Keville O'Sullivan Ltd

9C Beckett Way

Park Way Business Park

Dublin

D12 XN9W

RE:220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Mr Kennedy,

Thank you for consulting the Irish Peatland Conservation Council (IPCC) regarding the proposed off-shore wind farm. The IPCC was established in 1982 and has 41 years of experience in peatland conservation. Our aim is to conserve a representative sample of intact peatlands. Only 18% of Ireland's original range of peatland habitats are deemed worthy of conservation. 82% have become degraded from multiple pressures such as peat extraction, agriculture, forestry and habitat fragmentation (Ireland's Peatland Conservation Action Plan 2020, Malone & O'Connell, 2009). Originally County Clare held 61,489ha of intact peatland while County Galway held 159,739 ha. Currently, County Clare has only 6,552ha of intact peatland habitat while County Galway now only has 47,158ha. That is only 11% and 30% respectively. Peatland originally accounted for approximately 1/5th (~1.2M ha) of the habitat in Ireland, yet with only 18% functioning ecologically and hydrologically Ireland has experienced heavy biodiversity loss which the Government officially announced in 2019 by declaring an Climate and Biodiversity Emergency.

Our work is guided by our 6th Action Plan "Ireland's Peatland Conservation Action Plan 2020" and a recent amendment "Peatlands & Climate Change Action Plan 2030", which focuses on the role of peatlands in tackling predicted climate change. These documents are available for download on our website at www.ipcc.ie. Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The "National Peatlands Strategy" can be downloaded from www.npws.ie.

While we are not inherently opposed to the construction of wind farms as we understand that Ireland has legal obligations to provide 40% of its energy production from renewable sources by 2020 (under the 2009 Renewable Energy Directive), there is a responsibility on wind farm developers to ensure that there is no loss of important peatland habitat and the species that utilise it through the development of wind farms. Also, bad construction practices can result in an active carbon sink being converted to a carbon source which is detrimental to any effort in combating anthropogenically caused global climate change.

We urge developers to properly assess and screen for any adverse impacts on the habitat or species utilising them that may occur during the construction of any infrastructural development such as wind farms. We would also implore developers to have proper plans in place for the habitat regarding after-use restoration which clearly sets out a proposed timeline for the project area.

We have a number of concerns pertaining to the proposed development which need to be given due consideration within the pre-planning stage before IPCC could support the project.

Legal Obligations to Protect Peatlands

We are legally bound by National and European legislation (The Wildlife Acts, EU Habitats and Bird's Directives) and international conventions (Ramsar, Bern Convention, Convention on Biological Diversity) to do our utmost to protect peatlands now and for future generations. Peatland habitats have been severely diminished in the country and this destruction is an issue in other legislation and conventions such as the UN

40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

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Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Miriam Mooney, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar

Patrons: Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland, Kathrine Geoghegan Tina Claffey, Monty Don OBE, Helen Conneely.

Convention on Climate Change, Bonn Convention, World Heritage Convention, Water Framework Directive, Environment Liability Directive, Planning and Development Acts, National Monuments Acts, Environmental Directive, EIA and SEA. All of these legislative instruments have been adopted by Ireland and the IPCC ask that you assess your development with regard to these legal obligations.

National Monuments

Peatlands in Ireland hold a great deal of cultural and ancestral history, preserved in the anaerobic conditions. Ireland has international obligations under the European Convention on the Protection of the Archaeological Heritage, ratified by Ireland in 1997. Article 1 of this convention states that Ireland must “protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study”. There needs to be scientific supervision from an independent body that will evaluate the proposed project areas for their archaeological importance. The IPCC could not support the development before a full archaeological survey is undertaken and the necessary precautions and mitigations are in place to ensure that no loss of cultural archaeological information occurs as course of the proposed project areas.

Bogland

The IPCC would advise any developer planning construction in, or within close proximity to peatland habitat to be familiar with the Environmental Protection Agency funded project BOGLAND (www.ucd.ie/bogland). This project recommends the best practice guidelines to ensure no damaging development occurs on, or affects peat soils and peatlands of conservation value. Its overall objective was to develop guidance in the development of strategies for the sustainable future management of peatlands in Ireland. To this effect, the report aimed to provide a synthesis of knowledge on this key natural resource, the important functions and roles that peatland ecosystems perform, their various utilisations and how attitudes and policies affect them.

Nitrogen

It has been highlighted to the Irish Peatland Conservation Council that nitrogen is becoming an issue for designated sites. In 2018 in the UK 39 of 57 Special Areas of Conservation listed on the APIS website (<http://www.apis.ac.uk>) exceeded the Critical Load Threshold for nitrogen. This is having negative impacts on the vegetation of the designated habitats. There are various sources of excess nitrogen such as construction (e.g. roads, developments), urban waste water (pollution) and agriculture (e.g. fertilizer/piggerys) and can enter a habitat via wet or dry deposition. Please assess the proposed developments in terms of their impact on habitats and designated sites through excess nitrogen inputs. The materials used in construction, transportation of the materials, increased amenity use via improved access and increases in traffic should all be accounted for and projected into the future. This would also pose as an opportunity to collaborate with state organisations such the National Parks & Wildlife Service, Environmental Protection Agency and Irish Water in the management of the wider environment.

Biosecurity

Peatlands are susceptible to invasive species when they are drained and/or degraded as when the peat dries out it allows species which would not normally survive in the wet acidic conditions to take hold. The introduction of invasive species can exacerbate erosion and transpiration increasing degradation of the peatland. They can be introduced by many vectors such as traffic, which is increased through developments and fragmentation of the peatland habitat as access roads and construction lorries traverse and fragment the landscape. The movement of soils and machinery has to be monitored in and out of construction sites to ensure that best practice in relation to biosecurity is adhered to. The affects of fragmentation and increasing traffic and how they increase the risk of invasives needs to be accounted for in the pre-planning stage. The IPCC could not support a project that does not assess the risks in relation to the spread of invasive species. Please refer to www.npws.ie, National Biodiversity Action Plan 2017-2021 and Ireland's Peatland Conservation Action Plan 2020 for information regarding the need to control invasives.

Water Framework Directive

Ireland has legal obligations under the WFD to ensure that all rivers and lakes are of “Good Ecological Status” by 2027. Please ensure that the proposed development will not adversely impact on water quality and lower Ireland's standing with our legal obligations in protecting our waterways. Silt runoff and chemical/construction pollution can be disastrous for aquatic wildlife and this should also be factored into the management and construction plans of the proposed development. The monitored rivers surrounding the proposed development area range from “Moderate”, “Good” and “High”. The proposed development should not be allowed to go ahead if any degradation of the aquatic habitats is possible as an outcome. There may also be rivers or waterways that are not monitored by the Environmental Protection Agency and these should also be evaluated ecologically and hydrologically and included in pathways of influence assessments.

Curlew (*Numenius aquata*)

The Curlew is one of the most endangered species in Ireland and the resident breeding population has declined by 98% since the 1980s (NPWS, 2022). Curlew are listed as an ANNEX II section II bird species within the E.U Birds Directive [Council Directive 79/409/EEC] and also has a national status of Red on the Birds of Conservation Concern in Ireland list. The Curlew Conservation Programme (NPWS) is working to bring this species back from near extinction in Ireland and we would urge developers to liaise with them and BirdWatch Ireland in relation to any development. Breeding Curlew are site specific and will possibly not return if there are construction or operational disturbances and loss of habitat. This needs to be scrutinized with ornithological surveys within the recommended survey times for breeding Curlew to ascertain as to whether they are present and if they utilise the site for any other purposes such as foraging. It would be disastrous if this project was to contribute to the further decline of this nearly extinct species.

Wetland Surveys Ireland

There are a number of wetlands recorded by Wetland Surveys Ireland (www.wetlandsurveysireland.com) within the proposed project areas. These sites need due consideration to ensure that they will not be affected by the development and also please liaise with Wetland Surveys Ireland in regards to this proposed development. More than 90% of wetlands in North Western Europe have been drained/destroyed (EPA, 2011), leading us into a feedback loop where we have lost the habitats and ecological systems which sequester carbon, provide refugia for wildlife and protect us from climate change.

Fen

The National Parks and Wildlife Service have yet to publish the results of a National Fen Survey and as such Ireland is not aware of the full diversity and variation in fen habitats or the species that utilise them. This is important as it means that we can not effectively conserve a representative sample of fen peatland and we also do not know what parameters are important in regards this proposed development. Please ensure that all fen habitats maintains its integrity. All fen habitat must be identified and given due regard as part of this project proposal. There has been a preliminary study in regards to starting the National Fen Survey and the IPCC ask the developers to be familiar with it (Scoping Study and Pilot Survey of Fens Irish Wildlife Manual 143, NPWS, 2023)

Peat Depth

Historically, Ireland has predominantly been concerned with the extractive uses of peatland - and as such peatland was identified by using depth of peat, i.e to identify the areas where it would be profitable to drain and extract peat. As science and knowledge has moved forward we now know that this is not an effective way of habitat identification or cataloging Ireland's emissions or a habitats importance in-terms of biodiversity and conservation. As the content of organic matter in soils can vary, using peat depth misrepresents the peatland landscape as it is important to protect the full spectrum of peatland sites, from shallow slithers of peat to deep basins. Some peatlands which may be only 5cm deep can contain 100% organic matter, holding lots of carbon, but would not be classed as peatland as it is too shallow, excluding the land from policy making and land management decisions. A better way to represent and identify peatland is to use 30% organic matter weight, which has shown to include the more transitional peatland landscapes which are also hugely important for biodiversity. Please ensure that the developers are familiar with "Use of Peat Depth Criteria: Accounting for the lost peatlands - IUCN UK Peatland Programme" .

Designated Sites

The proposed wind farm is in an area rich in recognised and designated conservation sites. **Inner Galway Bay (SiteCode=4031), Creganna Marsh (SiteCode=4142), Rahasane Turlough SPA (SiteCode=4089), Cliffs of Moher SPA (SiteCode=4005), River Shannon & River Fergus Estuaries (SiteCode=4077), Lower River Shannon (SiteCode=2165), Tullagher Lough & Bog (SiteCode=2343), Inagh River Estuary (SiteCode=1036), Kilkee Reefs (SiteCode=2264), Carrowmore Dunes (SiteCode=2250), Carrowmore Point to Spanish Point & Islands (SiteCode=1021), Galway Bay Complex (SiteCode=0268), Lough Fingall Complex (SiteCode=0606), Lough Corrib (SiteCode=0297), Slievacallan Mountain Bog (SiteCode=2397), Cragnashingaun Bogs (SiteCode=2400), Lough Namina Bog (SiteCode=2367), Lough Acrow Bogs (SiteCode=2421), Poulmasherry Bog (SiteCode=0065), Farrihy Lough (SiteCode=0200), Whitestrand Carrowmore Marsh (SiteCode=1007), Clonderalaw Bay (SiteCode=0027), Castletaylor Complex SiteCode=0242), Killtullagh Turlough (SiteCode=0287), Monieva Bog (SiteCode=2352).**

The proposed project needs to ascertain possible negative impacts on the designated areas and ensure that no part of the proposed development detrimentally impacts on the integrity of the wetlands included within them. Physically, the hydrology needs to be maintained, this includes ensuring that no drainage of peatlands occur, flow rates of water ways are not impacted, that ground water is not polluted (peatlands are naturally nutrient poor so any addition to nutrient load can be detrimental and go against the conservation objectives of the site) and that the flora and fauna are not detrimentally impacted by fragmentation of the habitats or disturbance, during construction or operation.

The proposed project needs to ensure that there is no net-loss of biodiversity and that migration routes for mobile species keep their integrity, especially for nocturnally migrating species or over-wintering species (night time surveys need to be conducted, using acoustic methods and radar). Species will also be moving between sites and this needs to be ascertained using best practice guidelines and extensive long term monitoring. Smaller feeding and roosting areas outside the core areas also need to be protected from the development to ensure that the smaller designated sites have extra satellite habitats to support the species utilising the sites in their range. Weather patterns also need to be incorporated into the monitoring and impact projections as species can become disoriented and enter danger zones, posing a risk to biodiversity, especially during the winter months.


Please ensure that lighting of the proposed project (offshore and onshore) is appropriate and is also not going to detrimentally impact on species, such as during bad weather where birds may focus on lighted structures for navigation, this may also cause a collision, there is information regarding this within the research paper - *The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures, NatureScot Information Note, September 2020 v1.1*.

Many peatlands are currently being rehabilitated and restored by private organisations, the National Parks and Wildlife Service and Bord na Mona due to the eco-system services peatlands provide - which has been previously been ignored and disregarded, specifically, biodiversity, water regulation/filtration and carbon sequestration. The proposed project needs to ensure that no drainage of these habitats occurs and that the future restoration potential of peatlands are also not impacted. The offshore windfarm is being built to reduce carbon emissions and to move the national electricity network to sustainable energy generation but if the onshore component of the proposed project damages peatlands it will have the opposite effect, reducing the carbon sequestration power of natural habitats, causing carbon emissions, reducing water quality and directly losing habitat for internationally rare species.

Conclusion

Thank you for consulting with the Irish Peatland Conservation Council regarding the proposed project and please get back to us if you need further clarification

Your Sincerely,



Tristram Whyte - Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council

References

Status and Distribution of Breeding Curlew in Ireland 2021, Irish Wildlife Manuals 138, National Parks and Wildlife Service, 2022

Peatlands and Climate Change Action Plan 2030, O'Connell, C.A., Madigan, N., Whyte, T. & Farrell, P., 2021, Irish Peatland Conservation Council.

Ireland's Peatland Conservation Action Plan 2020, Sarah Malone B.A. Heritage Studies, Dr Catherine O'Connell, The Irish Peatland Conservation Council, 2009.

EPA STRIVE Programme 2007–2013 - BOGLAND: Sustainable Management of Peatlands in Ireland, Florence Renou-Wilson, Tom Bolger, Craig Bullock, Frank Convery, Jim Curry, Shane Ward, David Wilson and Christoph Müller, 2011, Environmental Protection Agency & University College Dublin.

Use of Peat Depth Criteria: Accounting for the lost peatlands - IUCN UK Peatland Programme, IUCN UK, June 2023.

IRISH RED GROUSE CONSERVATION TRUST

Patrons: Mr. P. J. O Hare Mr. Dan Kinney

Merlin Becker
The Wilderness
Lough Dan
Roundwood
Co. Wicklow
info@irgct.com
083 081 7554

20th October 2023

Dear Robert/Fuinneamh Sceirde Teoranta

We hope this finds you all well in these challenging times. The IRGCT is writing to you in relation to an important matter regarding the management of Ireland's natural environments.

We are making this submission on behalf of our members and supporter as well as the native flora and fauna of the island of Ireland. The IRGCT fully supports the governments drive for renewable energy but feels mitigation efforts should be significantly increased to help combat the damage that anthropogenic activities are causing to our planet.

In light of the climate and biodiversity emergency that Ireland now faces, the IRGCT finds it extremely pertinent that funds from wealthy wind farm developments should be put in place to achieve a net biodiversity gain during and after the development of such a site. One such example could be to employ local contractors to carry out sensitive habitat management work coupled with legal predator control as this combination of land management options is scientifically proven to increase wading bird productivity three-fold. Forestry England is now employing personnel to control generalist predators such as foxes and crows, the number one driver of ground nesting bird species decline, on many of their sites. The IRGCT strongly believes large multi-national corporations across Ireland should also adopt this forward-thinking conservation measure as without it many species face imminent extinction in less than 10 years. Local employment will support local communities to protect their native, living heritage and this in the grand scheme of things would cost very little when project budgets stretch into many millions of euros.

Many red listed species like ringed plover, curlew, and lapwing, all of which reside/nest on or around the onshore scoping area that is mapped out in your EIAR report, are vanishing in front of our very eyes. The question is, will large financial corporations stand by and ignore this wipeout of our natural heritage, or will they stand together for the protection and preservation of our precious natural environments through meaningful practical land management actions that delivers tangible results at grass root level.

Yours sincerely

Merlin Becker



IRGCT Hon Secretary
on behalf of the Irish Red Grouse Conservation Trust

Robert Kennedy

From: Tim Bourke <tim.bourke@sailing.ie>
Sent: 20 October 2023 14:27
To: Robert Kennedy
Cc: Tim Bourke
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: EIAR Scoping Report - Sceirde Rocks OWF - Final - September 2023.pdf; Irish Sailing Association - Scoping Consultee Letter - 2023.09.04 - 220404.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from tim.bourke@sailing.ie. [Learn why this is important](#)

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Dear Robert,

Apologies, I did not receive your earlier communication.

Could you please call me to discuss the attached at your earliest convenience.

Tim

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 19 October 2023 10:58
To: ISA General Enquiry <info@sailing.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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From: Robert Kennedy
Sent: Monday, September 4, 2023 10:00 AM
To: info@sailing.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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MEMO

Project Reference	220404 Sceirde Rocks Offshore Wind Farm
Time & Date	19 th December 2023
Subject	Irish Sailing
Author(s)	Rob Kennedy
Doc. file name	Irish Sailing - Record of Scoping Phone Calls – 2023.11.03 - 220404

Item	Description
1.	20/10/2023: Tim Bourke (TB), CEO of Irish Sailing, replied to Scoping Document requesting a callback.
2.	23/10/2023: Called TB who was interested to learn more about the Project. More information was provided on the Project, the EIAR process, Scoping, MKO's role as Environmental and Planning Consultants, and general queries on the Project were answered. It was clarified that turbines would only be built within the Marine Area Consent boundary, and not within the entire Offshore Scoping Area. Upon learning this information, TB clarified that Irish Sailing would not have any objections to the Project and that it will not be located within any sailing race zones. TB also acknowledged the need for renewable energy generation. It was recommended that MKO contact local sailing clubs in the area, TB would follow up by email with a list of clubs to consult with.
3.	2/11/2023: Sent a follow up email to TB requesting details of the local sailing clubs.
4.	3/11/2023: TB replied by email and advised that Irish Sailing have a staff member who works in the area. He will be connecting with him in a week's time to discuss and will revert to MKO.
5.	19/12/2023: TB provided contact details for sailing clubs. Forwarded to Kieran O'Malley to see if Corio want to engage with these clubs, however no response received.
6.	
7.	
8.	
9.	
10.	



Robert Kennedy

From: Ciarán Murphy <ciaran.murphy@sailing.ie>
Sent: 19 December 2023 13:26
To: Robert Kennedy
Cc: Vera Quinlan; Shona Gibson; Tim Bourke
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

You don't often get email from ciaran.murphy@sailing.ie. [Learn why this is important](#)

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Hi Robert

Please find below the contact details for our affiliated Clubs who may be impacted by the project and would be good to contact as part of your scoping process:

Clifden Boat Club	Beach Road, Clifden, Galway	info@clifdenboatclub.com	Damian Ward
Club Mara Chonamara Lair Mhurchú	Carna, Chonamara, Galway	clubmarachonamaralair@gmail.com	Pauline Uí
Cumann Seoltóireachta An Spidéil	Doire Uachtair, Furbo, Galway	cgroonell@gmail.com	Eoin Ó Conghaile
Galway Bay Sailing Club	Renville, Oranmore, Galway	info@gbsc.ie	Johnny Shorten
Galway City Sailing Club	Galway Harbour, Galway	info@galwaycitysailingclub.com	Martin Roe
Galway Hooker Sailing Club	13 Claddagh Quay, Galway	galwayhookercrew@gmail.com	Ciaran Oliver
Cumann Húicéirí na Gaillimhe	Tir an Fhia, Lettermore, Galway	cathalgriffin98@gmail.com	Cathal Griffin
Cumann Bádóireachta agus Seoltoireachta	Scoil Chiaráin, An Ceathrú Rua, Gaillimhe	seanmacdonncha@gmail.com	Seán Mac Donncha
Club Seolteoreachta Árannn Ghoill	Ionad Fiontar, Cill Ronáin, Inishmór, Arann,	cnighoill@eircom.net	Cathy Ní

Yours sincerely

Ciarán Murphy

Irish Sailing

From: Robert Kennedy
Sent: Monday, September 4, 2023 10:00 AM
To: info@sailing.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Robert Kennedy, MKO
rkennedy@mkoireland.ie

11 October 2023

Re: Sceirde Rocks OWF Environmental Impact Assessment Scoping Report

Dear Robert,

The Irish Whale and Dolphin Group (IWDG) was established in December 1990 and is an All-Ireland group “*dedicated to the conservation and better understanding of cetaceans (whales, dolphins and porpoises) in Irish waters through study, education and interpretation*”.

The IWDG welcomes the opportunity to comment on this scoping report. The following comments are offered in the context of the protection and conservation of marine mammals, basking sharks and their habitats during the development of the Sceirde Rocks OWF. The document *IWDG Policy Document on Offshore Windfarm Development* (2020) states the group’s overall position on ORE; this document is currently under review in light of current developments in legislation, guidance, and technology and an update will issue in due course.

Specific comments on the Scoping Report are presented followed by some more general observations and suggestions.

Table 8-9 *Policy and Guidance Relevant to Marine Mammals and Reptiles*.

Reference is made to the document *Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters* (DAHG, 2014). This guidance is currently under review and the updated guidance is likely to take a significantly different form.

Table 8-13 *Potential impacts on marine mammals and reptiles during construction/ decommissioning, operations and maintenance of the Project*

Impacts of operational noise was scoped out. A recent study by Thomsen et al (2023) indicated that operational noise from larger turbines (i.e. 20MW) may result in TTS ranges of 700m from source, potentially overlapping with TTS zones from other turbines and forming a barrier to cetaceans across entire windfarm sites. This should be taken into account in the EIAR when the specifications of the proposed turbines are finalized, and operational noise scoped in for assessment if necessary.

Section 7 Offshore physical environment and Section 8 Offshore biological environment.

No mention is made of any intention to establish baseline noise levels for the underwater environment at or near to the proposed development. The IWDG argue that there is an intrinsic value to establishing the baseline noise level to determine accurately the additional operational noise in the marine environment from the windfarm. Without establishing a baseline any measurements of operational noise would lack reference levels, and comparison could not be made between the pre- and post-construction soundscapes. This is important at the individual project level but also in terms of cumulative impacts on marine mammals from multiple projects and to inform future planning. In addition, an accurate baseline may inform modelling of noise during the construction phase and would help to more accurately predicting impacts on marine receptors. Sceirde Rocks is a unique dynamic environment and an understanding of the baseline noise regime in different weather conditions and throughout the tidal cycle may also be important in keeping noise levels under defined limits during any piling operations.

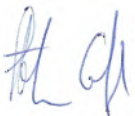
There is no reference to the use of acoustic techniques to establish baseline information about the presence of cetacean species. Click-detecting and broadband recorder hydrophones, deployed underwater over extended time periods, provide valuable 24-hour data on the presence or absence of vocalising whales, dolphins and porpoises and their use of the habitat. These devices not only help characterise the habitat for the purpose of EIA but also allow analysis of any change of use over time. Well-designed survey programmes allow Before-After-

Control-Impact type analysis to be carried out on marine mammals. By designing programmes in a timely manner and initiating survey effort well in advance of construction, an accurate assessment can be made of the impacts, if any, of construction and operation which can in turn inform the consent process for future developments and add knowledge of the marine realm, which is notoriously data-poor.

There is great potential to ensure a net benefit to the marine ecosystem of ORE through biodiversity enhancement. Development of natural biogenic reefs, i.e. using mussels or oysters, can form substrates for other sessile and mobile organisms and initiate the recovery of seabed and the broader ecosystem formerly modified by bottom trawling and dredging. Artificial reefs are another tool to enhance biodiversity; careful choice of materials used for in-water structures such as moorings, scour protection, and cable protection can provide a three-dimensional environment suitable for colonisation.

Monitoring of all parameters across the marine ecosystem should begin before project construction with bird, marine mammal, fish and benthic surveys. To have real value as a measure of the impacts of all phases of the project, and the success or otherwise of planning, mitigation and enhancement measures applied, a detailed programme of continuous monitoring across all parameters must be developed. ORE projects will have significant impacts on marine species and on the whole ecosystem. These need to be continually assessed at a meaningful scale to understand the impacts and to inform future development.

Yours faithfully



Dr Stephen Comerford
Marine Policy Officer IWDG
stephen.comerford@iwdg.ie

References

DAHG (2014). *Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters*. NPWS Department of Arts, Heritage and the Gaeltacht, January 2014.

IWDG (2020). *Offshore Wind Policy Document*. Published by the Irish Whale and Dolphin Group, 2020.

Thomsen, Frank & Stöber, Uwe & Sarnocińska-Kot, Joanna. (2023). Hearing Impact on Marine Mammals Due to Underwater Sound from Future Wind Farms. 10.1007/978-3-031-10417-6_163-1.

Robert Kennedy

From: IWT Info <info@iwt.ie>
Sent: 06 September 2023 08:42
To: Robert Kennedy
Subject: Re: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: image001.jpg

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Robert,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,
Fabiola Vieira

On Mon, 4 Sept 2023 at 10:33, Robert Kennedy <rkennedy@mkoireland.ie> wrote:

Ms Vieira,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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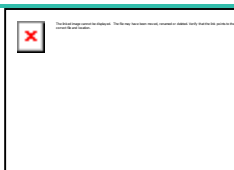
Kind regards,

Robert Kennedy

Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin

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HELP SUPPORT OUR WORK - Join the IWT Today - <https://iwt.ie/support-us/become-a-member/>

Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2

Registered Charity (CRA) Number: 20010966

Facebook: IrishWildlifeTrust

Twitter: @irishwildlife

Phone: 01 445 7259 (landline available Wednesday-Thursday 9:30 to 5pm)

Robert Kennedy

From: Transport Maritime Safety Policy Division
<MaritimeSafetyPolicyDivision@transport.gov.ie>
Sent: 04 September 2023 13:50
To: Robert Kennedy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Robert,

I confirm receipt of the scoping document.

Kind Regards,
Gerard

Gerard Noonan
Maritime Safety Policy Division

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 678 3423
gerard.noonan@transport.gov.ie www.gov.ie/transport

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Monday 4 September 2023 10:52
To: Transport Maritime Safety Policy Division <MaritimeSafetyPolicyDivision@transport.gov.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Transport Maritime Safety Policy Division
<MaritimeSafetyPolicyDivision@transport.gov.ie>
Sent: 20 October 2023 08:36
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Mr Kennedy,

Apologies for not replying to you earlier. My division does not have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm.

Regards,
Gerard

Gerard Noonan
Maritime Safety Policy Division

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 678 3423
gerard.noonan@transport.gov.ie www.gov.ie/transport

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 19 October 2023 11:04
To: Transport Maritime Safety Policy Division <MaritimeSafetyPolicyDivision@transport.gov.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Rob

Robert Kennedy
Environmental Scientist

MKO

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From: Transport Maritime Safety Policy Division <MaritimeSafetyPolicyDivision@transport.gov.ie>
Sent: Monday, September 4, 2023 1:50 PM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Robert Kennedy
Environmental Scientist

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Offices in Galway and Dublin
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Robert Kennedy

From: Sinead Duffy <sinead.duffy@met.ie>
Sent: 07 November 2023 13:14
To: Robert Kennedy
Cc: Radar; Enquiries; Sarah Gallagher; Tony O'Leary
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

You don't often get email from sinead.duffy@met.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon Mr. Kennedy,

Thanks for taking my call yesterday afternoon about feedback from Met Éireann on the Scoping Study for the Sceirde Rocks Offshore Wind Farm.

As discussed, the proposed offshore array area as shown in figure 7.1 of the EIAR Scoping Report (and below) may have a detrimental impact on the measurement of wind speed and direction at Met Éireann's automatic weather station at Mace Head Atmospheric Research Station near Carna, Co. Galway (Location: 53°19'33" N, 09°54'03" W). Mace Head weather station has been operational since 2003, with measurements of wind speed and direction taken along with air temperature, rainfall, humidity, etc.

The closest turbine in the offshore array area looks to be within 6km of the Mace Head automatic weather station, and the wind turbine generators (WTGs) may be up to 325m tall (Table 5-1 below from the EIAR Scoping Study). The offshore array area should be at least 9.75km away from the Mace Head wind measurement equipment. This is 30 times the height of the WTGs, ie 30 x 325m. This calculation is taken from World Meteorological Organisation's Guide to Instruments and Methods of Observation Volume 1. See section 5.9.2 of the guide [here](#) about information on using anemometers to measure wind speed and direction.

We would be grateful if you could take this feedback into the next stage planning process for Sceirde Rocks Offshore Wind Farm and address the point we have raised about the proposed offshore array area's impacts on wind measurements at Met Éireann's automatic weather station at Mace Head.

When do you anticipate that this project will progress to apply for planning permission to An Bord Pleanála? We would be grateful if you could keep us informed.

Table 5-1 Anticipated Maximum Design Envelope for Wind Turbine Generators (WTGs)

Design Parameter	Maximum Design Envelope
Number of WTGs	Up to 30
Hub height (m, above mean sea level)	Up to 185m
Rotor diameter (m)	Up to 290m
Maximum rotor tip height (m, above LAT)	Up to 325m

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Monday, September 4, 2023 11:16 AM
To: 'enquiries@met.ie' <enquiries@met.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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MEMO

Project Reference	220404 Sceirde Rocks Offshore Wind Farm
Time & Date	6 th November 2023
Subject	Met Éireann
Author(s)	Rob Kennedy
Doc. file name	Met Éireann - Record of Scoping Phone Calls – 2023.11.03 - 220404

Item	Description
1.	06/11/2023: Call received from Sinead Duffy in Met Éireann (Meteorologist, Observations Division). Ms. Duffy asked some questions in relation to the Project and its status. She raised concerns regarding the impact that the Project may have on the Mace Head Atmospheric Research Station near Carna (location: 53°19'33" N, 09°54'03" W). Mace Head weather station has been operational since 2003, with measurements of wind speed and direction taken along with air temperature, rainfall, humidity, etc. The Project may have a detrimental impact on the weather station's measurement of wind speed and direction. Many turbines do not meet the World Meteorological Organisation's guidelines regarding minimum setback distance from weather stations.
2.	07/11/2023: Ms. Duffy followed up with further information and feedback in an email. Also requested that we keep them informed of the Project's progression through the planning process.
3.	07/11/2023: Discussed above with client on weekly call. Above email was then forwarded to client with offer to set up a meeting with Met Éireann.
4.	
5.	
6.	
7.	
8.	
9.	
10.	



Robert Kennedy

From: O Connor, Denis <denis.oconnor@universityofgalway.ie>
Sent: 22 November 2023 14:35
To: Robert Kennedy
Cc: Ovadnevaite, Jurgita
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: Impact Assessment Document MHD 2023 v2.pdf

You don't often get email from denis.oconnor@universityofgalway.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Robert

Please find attached a report that we have conducted showing the impact of the proposed scheme on the weather station located at Mace Head.

Our research team plan to provide a separate response to your document and I will share as soon as received

Regards

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 3 November 2023 16:06
To: O Connor, Denis <denis.oconnor@universityofgalway.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

EXTERNAL EMAIL: This email originated outside the University of Galway. Do not open attachments or click on links unless you believe the content is safe.

RÍOMHPHOST SEACHTRACH: Níor tháinig an ríomhphost seo ó Ollscoil na Gaillimhe. Ná hoscail ceangaltáin agus ná cliceáil ar naisc mura gcreideann tú go bhfuil an t-ábhar sábháilte.

Mr. O'Connor,

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If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, it would be much appreciated. Please note, I attempted to engage with you earlier in the scoping process

but did not have an email address for your department. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

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Business Park, Dublin, D12 XN9W



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On the Potential Impact of the Off-Shore Screidre Rocks Wind Farm upon the Credibility of Baseline Monitoring Status: Mace Head Atmospheric Research Station

Authors

Prof. Colin O'Dowd, Prof. Jurgita Ovadnevaite, Dr Damien Martin, Gerard Spain, Dr Joe Pitt, Dr Dickon Young* and Prof. Simon O'Doherty**

School of Natural Sciences, Physics, the Ryan Institute Centre for Climate & Air Pollution Studies, University of Galway, Galway, Ireland

**School of Chemistry, University of Bristol, Cantock's Close, Bristol, UK*





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Background Mace Head Atmospheric Research Station (WMO Global Atmosphere Watch station: Identifier MHD, further referred as Mace Head or station here) is one of the leading climate and air pollution research and monitoring stations world-wide and a **national facility** that empowers the assessment of Climate Change. With its ultra-high resolution climate record extending from the ozone depletion and acid rain days of the 1980s, Mace Head's observation record became increasingly more important with time, particularly for underpinning international policy and intervention as well as national Climate Actions.

The station is a vital long-term sampling location for many international climate change and ozone depletion research networks including the Advanced Global Atmospheric Gases Experiment (AGAGE), the UK DECC Network (funded by the UK Governments Department for Energy Security and Net Zero), the Integrated Carbon Observing System (ICOS), the European Monitoring and Evaluation Programme (EMEP), and the World Meteorological Organisation/Global Atmosphere Watch (WMO/GAW) network. It is one of only thirty GAW background stations on the planet (Figure 1), selected because of its' remoteness from major sources of industrial emissions and the **only one located in mid-latitude Western Europe**, upwind of the region where the majority of the population lives, thus, both globally and regionally important.



Figure 1 The map of GAW Global stations. Currently GAW coordinates activities and data from 30 Global stations, more than 400 Regional stations, and around 100 Contributing stations operated by Contributing networks. GAW Global stations have the most extensive measurement programme in at least three of the six GAW focal areas.

Research Activities and Themes

Mace Head has a number of robust, long-term, research activities and themes, including monitoring climate change, atmospheric composition, ozone depletion, aerosol-cloud interactions, air quality, atmosphere-ocean exchange and climate-ecosystem interactions. The data produced from the many studies carried out there underpin a vast amount of research output and reports including the WMO Scientific Assessment of Ozone Depletion, IPCC Climate Change documents, as well as estimation of Greenhouse Gas (GHG) emissions to enable the verification of the GHG inventory submission to the UNFCCC. Mace Head also strives to promote education within the topics of climate, air pollution, and the atmosphere. In terms of established scientific metrics, (e.g. Web of Science) Mace Head has been the focus of more than 1000 publications, 50,000 citations, an *h*-index over 100 and ranking among the best stations internationally.

Impact of Sceirde rocks windfarm development on measurements at Mace Head

Following successful early stages of planning application processes to locate a large-scale offshore wind farm directly upwind of the station in its prevailing clean air sampling sector (Figure 2), e.g., 4-5 day transit of air over the clean North Atlantic before touching land in Europe (Figure 3). We highlight major impacts that the development will have on one of the planet's key environmental monitoring resources.

MAJOR IMPACT

Sources of pollution and perturbations to natural system within the Mace Head measurement footprint area render it not fit for purpose as a baseline station – there is no tolerance in gradation acceptable.

The document summarises the key biogeochemical and climate related elements of Mace Head monitoring system which encapsulates the cleanest air entering and the most polluted air being exported from Europe. This ultimately allows us to determine how dirty our cleanest air has become, and how it impacts on climate. We aim to evaluate the extent of the impact that the wind farm operations will have on Mace Head through a collation of our current expert knowledge. **Sources of pollution and perturbations to natural systems within the station's clean air sector will render it not fit for purpose as a baseline station – there is no tolerance in gradation acceptable.**

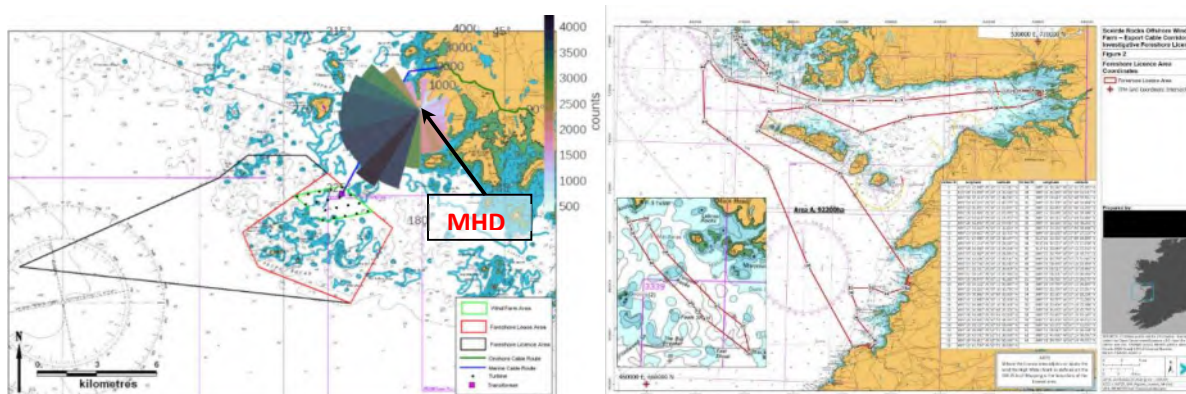


Figure 2 (Left) Prevailing winds as shown by the wind rose centred at Mace Head (MHD) and derived from 2-year wind LIDAR measurements. Concentric circles around the station from the wind rose mark circles each 1 up to 5 km from the centre. The original proposed wind farm (array of black dots) is of the order of 5 km from Mace Head and is directly in the prevailing wind direction. **(Right)** The map of currently proposed development with the scale of the output capacity increased by a factor of 4-5 from the original one which translates to an area increase of 50% with essential obliteration of the Mace Head clean sector.

Baseline Monitoring

Mace Head is a baseline monitoring station which means it has the capability of determining the reference state of the environment from which assessments of climate and environmental changes are made, enabling the highest quality data necessary for reliable evidence based decision-making and interventions. The baseline station status is acquired for being exposed to pristine (mostly anthropogenically undisturbed, Figure 3) or background air and being able to accumulate a long-term record over decadal scales to illustrate the success or failure of global and regional interventions.

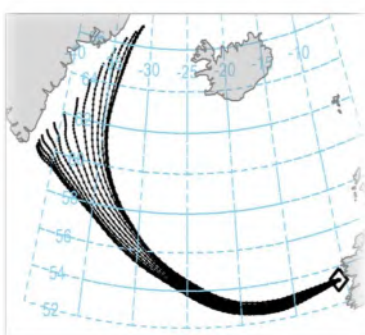


Figure 3 Air mass back trajectories (AKA pathways of air parcels) arriving at the station's prevailing winds sector, from the South-West approaches, illustrating a 4-5-day transit of air over the clean North Atlantic Ocean before touching land in Europe.

The pristine data are widely used to derive baselines for climate assessments of national, regional and global significance. An additional important role of background stations is that they are excellent locations for large scale studies to elucidate key processes in the atmosphere and at the ocean surface with much better cost effectiveness, compared to ships or aircraft.

Supersite stations like Mace Head generate data to unravel complex natural systems, or components of the climate system and benchmark the condition of preindustrial era (baseline conditions from natural sources). Therefore, any small sources of local pollution, however small, will alter these natural conditions and diminish the importance of the measurements, observations and resulting assessments.

Changes in Atmospheric Composition (air pollutants and greenhouse gases) are likely to result in superimposed signals from the different stages of the wind farm's development (i.e., site investigation, construction of operations, support, and development) and perturbations in the natural baseline that is currently evaluated at the station.

The most obvious way that such a development can affect a GAW station is via direct emissions that are injected into the air, or directly entrained and transported into a receptor air parcel advecting towards the monitoring facility. Perhaps equally as important, if not more so in some cases, is an indirect pathway where pollutants are brought to the sea-air interface and transported into the air *via* bubble bursting processes. Such indirect routes can involve a range of processes, e.g., multiphase chemical reactions like those involved in ozone depletion where chemical reactions on the surfaces of particles or supercooled droplets can prevail. The most important Processes and Parameters selected and identified as **impacted** by either direct or indirect emissions, are discussed below.

There are two main impact pathways identified involving: (i) **changes in the air-sea exchange of mass (including chemical composition) and energy (e.g., micrometeorological fluxes like heat and momentum); and (ii) direct emissions of air pollutants and greenhouse gases into the marine boundary layer or surface waters.**

IMPACT ON METEOROLOGY: [turbulence, wind fields, vertical temperature and humidity gradients, precipitation]

One of the most impressive images of an offshore wind farm is captured when a combination of meteorological conditions leads to the formation of 'wake clouds' emerging from each turbine in the array (Figure 4). This cloud, while it persists, serves to allow the observer to see the turbulent nature of the normally invisible structure to a human eye. The structure results from lower windspeeds and increased turbulence downwind of the turbine.



Figure 4. Photo illustration of a turbine wake effect visualised with the aid of a mixing cloud. Reproduced from NOAA (<https://www.climate.gov/news-features/featured-images/wind-turbines-churn-air-over-north-sea>). The wake formation drives the formation of liquid condensation mixing cloud.

The higher intensity turbulence leads to a more disrupted sea surface as whitecaps entrain air into the breaking waves. This leads to indirect effects for aerosol production and gas transfer, as discussed later in the **Aerosol and Gas sections**. The 'mixing cloud' trail extends up to several kms, or even 10s of kms down wind of the turbine array and occurs when mixing of near or slightly saturated air parcels occurs,

spontaneously forming cloud. The collective impact of the full array of turbines, or farm, is significant as the effects can stretch to 10s of km of visible cloud as a result of the invisible turbulence. As the wakes become established downwind, the drag coefficient at the ocean surface can increase, providing more resistance to the air flow movement. This impacts on whitecaps and bubble mediated sea-air transfer of both particles and trace gases (discussed later). The disruption of the boundary layer structure propagates down the surface. **The main impact of the turbines is, thus, to disrupt the natural air flow arriving in the prevailing southwesterlies at the station** with increased turbulence and significantly lower windspeeds concomitant with as much as 20% energy loss as the turbine interacts with the turbulent air.

An important point to take home from these impressive wind farm cloud trails is that the spatial scales of interference are the same magnitude as the distance the proposed wind farm is from the station (10s of kms).

This will result in profound errors in the quantification of biogeochemical parameterisations derived from the Mace Head measurements, or flux, footprint since many parameters are related to one another through power-law relationships – often leading to larger than expected sensitivity and ever-increasing uncertainties associated with one parameters dependence on another. This will lead to misrepresentation of parameters if the parameterisation is implemented into a global model.

IMPACT ON GASES: [greenhouse and trace gas concentrations, natural baseline, trends, and reactive gas phase chemistry]

The time series from long-term baseline monitoring stations are very scarce and incredibly valuable. Figure 5 shows the Keeling Curve – the longest *in-situ* atmospheric record for CO₂ – made at the Mauna Loa Observatory in Hawaii. These measurements are reproduced at Mace Head, which has the longest record of background greenhouse gases (GHG) in Europe.

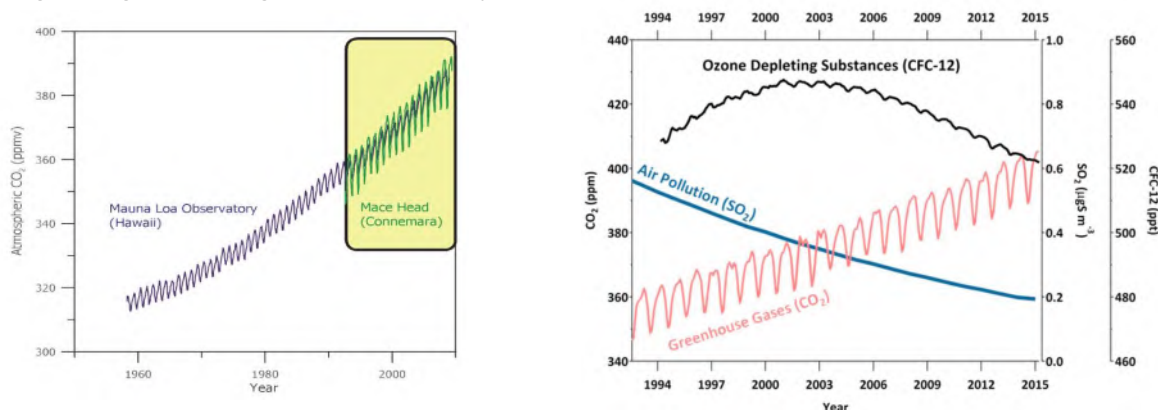


Figure 5. (Left) The carbon dioxide data at **Mauna Loa** constitute the longest record of direct measurements of CO₂ in the atmosphere. They were started by C. David Keeling of the Scripps Institution of Oceanography in March of 1958. **(Right)** Mace Head's uniqueness in the multiplicity of the long-term time series and its location, which enables it to provide a mid-latitude northern-hemispheric baseline.

The Figure 5 (right panel) also indicates different long-term trends in atmospheric gases due to success or failure of different international agreements e.g., the success of Montreal protocol resulting in stabilisation and then reduction of CFC-12 concentrations, or different air quality policies, targeting tailpipe emissions, resulting in 80% decrease in sulfur emissions as well as concentrations (SO₂ trend). However, the unfortunate failure to curb the CO₂ emissions is indicated by the constant increase in CO₂ concentrations shown in this figure. Different gases contribute to different phenomena: CO₂ is a greenhouse gas and is relatively unreactive whereas SO₂ is more reactive and is an air pollutant and precursor for aerosol particles, ozone (not shown) is even more reactive and both a GHG and an air pollutant, depending on where it is concentrated. In addition, ozone acts as a UV shield. Ozone, unlike other gases cannot be directly regulated as it is not emitted directly. The most important of the gases are halogen gases that impact both GHG and air pollution. One of the most damaging of the polluting gases are from the CFC family which are essentially unreactive lower in the atmosphere but highly reactive, depleting ozone, in the upper atmosphere. **Mace Head measurements provide a North Atlantic background record for these key species, which will be disturbed by the wind farm operations.**

Currently, the clean-air-sector CO₂ time series at the station exhibits only pristine, baseline conditions, with the natural seasonal cycle in CO₂ superimposed on rising background concentrations. If this GAW station did not have baseline capability, changes in North Atlantic background CO₂ concentrations would not be captured or evaluated.

Over oceans, the transfer of CO₂ is more of a function of wind speed, temperature/solubility and chemical reactivity at the surface and the flux can be either into the ocean or out. Fundamental understanding on how these processes change with changing climate is crucial for future climate predictions and mitigation but also for quantifying natural carbon dioxide removal (CDR) processes. Both direct and indirect impacts from the wind farm *via* emissions and perturbation to the natural system will potentially influence these processes and complicate the evaluation if not make it impossible.

While fuel combustion emission will be the most significant concern, there are potentially other emissions which have not been considered in the planning application. Greenhouse gas and Ozone depleting gas species (ODS's) are widely used e.g., in air conditioning and refrigeration (HCFCs, HFC, HFOs), fire extinguishers (Halons), as blowing agents and fire retardants in foams (HCFCs, HFCs, HFOs) and arc suppression in switchgear (SF₆). In considering potential emissions in the planning application, these species have been ignored – however they are ubiquitous and the systems in which they are used invariably leak, resulting in unquantifiable effects.

Sulphur Hexafluoride (SF₆) is an exceptionally strong greenhouse gas, over 20,000 times more potent per molecule than CO₂ (when considered over a 100-year period). With a lifetime of 3,200 years, emissions of this gas continue to contribute to a steady increase in atmospheric concentrations. Its main use, and main emission source, is as an insulating material for medium and high voltage electrical infrastructure. In wind turbines, SF₆ is typically used in switchgear. It can be emitted to the atmosphere either through leakage or during maintenance events.

Measurements of SF₆ have been made at Mace Head in situ since 2003 and in flasks since 1997. This represents the longest continuous timeseries of SF₆ measurements in Europe. As for other species, Mace Head measurements from the clean-air sector are used to define the North Atlantic background for this species, against which pollution at other European sites are referenced. **The presence of local SF₆ emissions in the station's clean-air sector from the proposed wind farm would therefore be highly problematic for SF₆ emission estimation throughout Europe.**

In addition to producing emissions outlined above, turbines will generate turbulence and enhance mixing, which, in turn, will affect the dynamics of observed natural species emitted from the ocean (e.g. methyl bromide and methyl iodide) and thus no longer be representative of the natural unperturbed atmosphere.

IMPACT ON AEROSOLS: [marine and regional aerosol concentrations, natural baseline, trends, aerosol cloud interactions, and new particle formation]

Aerosols, also known as particulate matter (PM), come in many forms, but they can generally be classified in their most simple of terms as primary or secondary, the former from the breakup of a parent material or incomplete combustion and the latter, through phase changes or chemical reactions. Aerosol particles extend several orders of magnitude in size from few nanometres to several hundred micrometres.

Aerosols and aerosol-cloud interactions continue to be a major uncertainty in Climate Models, impeding their ability to reproduce the observed historical warming and to project changes in global climate and water cycle. Moreover, establishing a well-defined preindustrial baseline for aerosols (levels before anthropogenic emissions) and aerosol-cloud interactions is an ultimate constraint for quantitative and accurate climate modelling. Process-based studies in pristine environments, such as Mace Head, are, thus, crucial for any advancement in energy budget representation. Globally, marine aerosols, both primary and secondary are a significant if not dominant contributor to this preindustrial baseline. Marine biological activity generates substantial amounts of organic matter which produces both primary and secondary aerosols with complex chemical properties. Marine aerosols are perhaps the most climate relevant of all aerosols giving

their haze and cloud formation potential and that their reflective layers overly a dark (absorbing) oceanic surface which covers 70% of the globe.

The global international Surface Ocean - Lower Atmosphere Study (SOLAS) programme has highlighted the importance of the diversity of marine aerosols and of their sources in remote regions. It stressed that understanding the relationship between ocean emissions of primary and secondary aerosols and cloud properties requires a more comprehensive knowledge of their origin and interactions. **Mace Head is at the forefront of facilitating these studies and hosting numerous international field campaigns and long-term observations of aerosol production and aerosol-cloud interactions.**

The wind farm in the footprint of the most pristine marine aerosol measurements will affect the natural system with contributions to the **primary sea spray aerosol** which is formed by wind induced wave breaking. E.g., changes in the wind fields and turbulence discussed above will also manifest in changes and more likely additional production of primary sea spray that will be superimposed to the open ocean signal that is studied at Mace Head. This effect will be significant and difficult to quantify due to a power-law relationship between wind speed and the sea spray emissions. The surfactants present as organic compounds, potentially leaking during operations, can also significantly enhance sea spray production by affecting the stability of bursting bubbles, which is much more complicated to account for than any direct emissions of pollutants.

Furthermore, emissions of secondary aerosol precursors, like DMS or oxygenated volatile organic compounds (OVOCs), also depend on wind shear, which again will be affected by the wind farm infrastructure and will have an impact on the release of the gases that in turn form secondary aerosol.

In addition to the perturbation of this natural system, construction and support of the wind farm will require regular ship traffic in front of Mace Head that will contribute to the aerosol load from direct ship emissions.

Ships predominantly use fossil fuels for propulsion and electricity generation, which emit greenhouse gases such as carbon dioxide and methane, and air pollutants such as particulate matter, sulfur oxides, nitrogen oxides, and volatile organic compounds. Recent laboratory, shipborne, satellite and modelling studies provided convincing evidence that ship-emitted air pollutants have significant impacts on atmospheric chemistry, clouds, and ocean biogeochemistry (Figure 6).

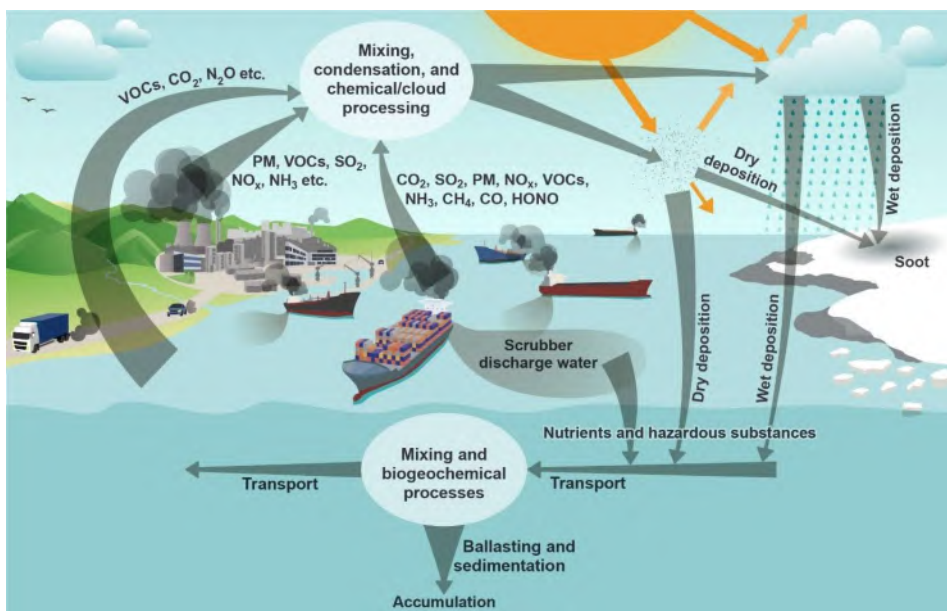


Figure 6. An overview of the emissions, processes, and impacts of shipping. Ship-emitted air pollutants (primary) are mixed in the atmosphere with other pollutants and undergo complex chemical and physical processing, leading to formation of secondary pollutants such as particulate matter; the primary and secondary pollutants interact with radiation to cause light absorption and scattering, affecting the climate; particulate matter can also interact with clouds to further

affect the climate (indirectly); once deposited to the surface ocean, **the nutrients and hazardous substance from the particles can then affect ocean biogeochemistry**, with indirect impacts on the climate. Reproduced from Shi et al. (10.1525/elementa.2023.00052).

Particulate and gaseous emissions from shipping will, thus, affect the baseline conditions measured at Mace Head, with impossible quantification of the effect. Our measurements at Dublin port indicate that shipping emissions have a profound impact on local air quality and Particulate Matter (PM) concentrations as shown in the Figure 7 below with ship emissions accounting over 75% of the pollution plumes. More importantly, **these are not captured in the state-of-the-art models due to challenges in accounting for the relevant emissions in the emission inventories**. Figure 7 indicates that if regional pollution transport is reasonably well captured (Dec 30 - Jan 03), the short ship plumes are missed completely in the model (regular short-term plumes). Pointing to inability of current models to properly assess the impacts from ship emissions and contributing to the challenge of quantifying the impact on Mace Head measurements. To put things into perspective, the pristine marine aerosol concentrations that are normally observed at the station are mostly $<0.5 \mu\text{g m}^{-3}$ with maximum reaching of $3.5 \mu\text{g m}^{-3}$, indicating few orders of magnitude higher potential contributions from shipping emissions than what is measured from the marine environment.

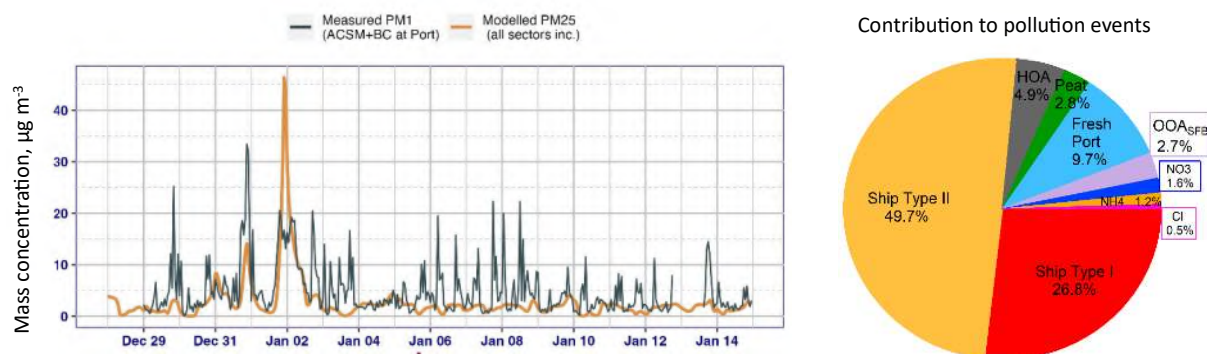


Figure 7. (Left) Temporal trends of PM concentration as measured and modelled in Dublin port and **(Right)** pie chart contribution of sources to the pollution events with ship emission contributions amounting to 77%.

Last but not least, the nutrients and hazardous substance from the particles (emitted by ships) can then deposit into the water and affect ocean biogeochemistry as well as alter the natural conditions even further.

IMPACT ON CLOUDS: [cloud microphysics, aerosol activation processes and precipitation].

CLOUD formation and aerosol-cloud interactions not only amongst the most challenging to elucidate, but potentially most devastating in impact in the context of floods and drought, and in terms of cleaning our atmosphere, e.g., rain washout of pollution.

Aerosols control the reflectance of haze and cloud layers which, in turn, determines a large component of the heating and cooling effects of the atmosphere. Even when a parcel of air is sub-saturated, the relative humidity is sufficient for a droplet to uptake even 8 times its own weight of water to form a haze particle. The Kelvin (curvature) Effect explains the need for higher vapour pressures required to maintain a droplet in equilibrium, as the particle size decreases while the solute effect competes for available liquid water.

The change of phase when a parcel changes from a cloud free to a liquid water cloud involves phase changing of massive volumes of water but only requires a fraction of 1 percent super saturation. Despite the sensitivity of the cloud layers to aerosol particles or nuclei (i.e., the activation response), the cloud layer itself and how it responds to forcings such as injection of nuclei is quite conservative. All else being equal, the cloud droplet concentration monotonically increases with nuclei (aerosol) availability increasing (e.g., from ship emissions). As the nuclei compete for liquid water, the plume forms a ship track in the cloud which manifests itself as an extensive plume of higher reflectance cloud area.

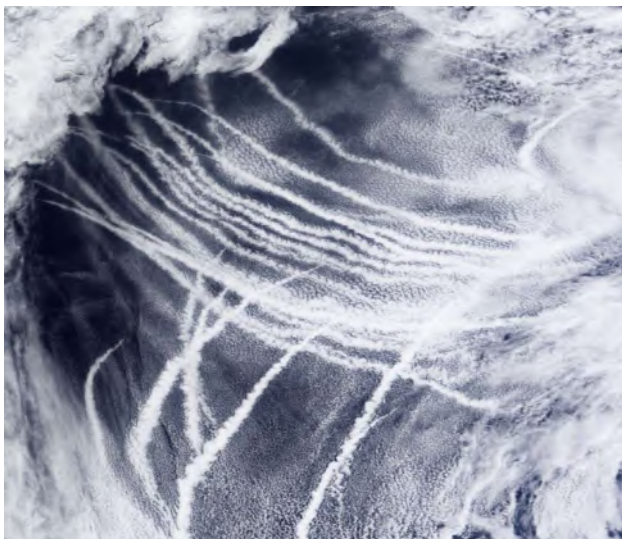


Figure 8. Satellite image of visual ship trails, indicating the impact of ship emissions on cloud formation.

Such changes in the cloud reflectance, are clearly visible from space, as shown in Figure 8. In the cloud region with elevated cloud nuclei (ship track), there is an increase in droplet concentration and a reduction in effective radius of the droplet, both effects combining to increase cloud top brightness. This effect is optimal especially when clouds overly the dark absorbing ocean surface leading to one of the most sensitive aerosol-cloud-radiation components of the Earth's radiative budget. These ship tracks persist many 10s to 100s of km over timescales of hours. Latest studies also indicate the presence of 'invisible ship tracks' that can dominate in certain areas and alter the cloud properties as

well as radiative budget but are not visible to satellites, therefore, much more difficult to quantify.

In addition to the direct ship emissions of aerosol affecting clouds, the impacts on natural aerosols described above will propagate to cloud effects *via* changes in aerosol properties and population, thus, **will superimpose the natural cloud baseline investigated at Mace Head similarly to all the parameters listed above.**

Moreover, another important impact is that of cloud lifetime and delays in precipitation onset with smaller droplet sizes, leading to precipitation reduction, particularly for stratiform clouds. These monotonic effects hold for clouds forming on a single species population like sulphate nuclei, but large deviations in monotonicity emerging from another species present in lower abundance but higher activity, leading to even further complexity in an apparently simple binary system comprising sulphate and sea-salt.

The complexity is again even further enhanced when considering even more convective, mixed-phase clouds, particularly those invigorated by black carbon, a strong absorber.

Concluding remarks

In the above assessment of some of the processes and effects on air composition and climate, we have briefly given a flavour of the diversity of parameters contributing to the complexity of the system, thus, making it challenging to evaluate the specific impact of local and transported sources to a baseline signal.

It can be shown that the uncertainty associated with many of the aerosol-cloud interactions can exceed several 100%, and similar uncertainties can be demonstrated for the aerosol formation part. To date, sufficient data are not available to quantify these processes to any reasonable level of confidence in terms of detailed models and while in some cases measurements with sufficient resolution for detection can be made, they are a long way off for others.

Given that many compounds in question have natural sources as well, this makes an assessment of the anthropogenic emissions or contribution equally challenging. We have shown that the perturbation in the meteorological structure and associated processes, as visualised through wake clouds, are to such extent that their interference over the spatial scales is unlikely to be viewed as acceptable for a non-disturbed environment. Progressing our qualitative approach, we discuss the complexity of greenhouse gas emissions and reactive gas formation, illustrating many unknowns in the system that won't be solved in the immediate future.

The off-shore array will have a significant impact on the turbulence structure, the wind speed profiles, white-capping and through to cloud reflectance, cloud-microphysics, and precipitation formation – all contributing to natural impacts, alongside the additional anthropogenic species that will be added directly to the system:

- Disruption of boundary layer flow and air-sea exchange (increase in turbulence, change in wind fields) leading to indirect effects on aerosol production, gas transfer, cloud activation
- Disruption of natural aerosol-cloud system (increase in turbulence, change in wind fields, new sources of pollutants) leading to changes in cloud lifetime, microphysics, precipitation reduction or delays in precipitation
- Contamination (new sources of pollutants) of background baseline greenhouse gas emissions, leading to changes in the North Atlantic background reference and jeopardizing greenhouse gas emission estimations throughout Europe
- Contamination (new sources of pollutants) of the background baseline aerosol signature, leading to changes in the North Atlantic background reference for climate models

For a baseline observing system to work, there can be no source of pollutants emitted from the Focus (Study) Area. It is not a question of acceptable levels; the facility would simply be not fit for purpose. Therefore, the impact assessment cannot be solely based on air pollution emissions and air quality limits, instead it should assess an interference with the baseline conditions. E.g., **evaluating the wind farm impact against Air Quality regulations is not appropriate or relevant for the baseline stations like Mace Head as they study the pristine conditions where there is no tolerance in local pollution sources.**

The majority of the compounds, listed as potential atmospheric emissions in the planning application and above, are measured at high frequency at Mace Head. Therefore, even if 'elevated concentrations will be short-lived' during the Site investigation Phase, a significant part of the work undertaken at Mace Head involves the determination of northern hemisphere pristine air background concentrations and these perturbations in baseline observations will have a significant impact on the number of the research themes outlined above and by implication on the aims and mission of the observatory.

The associated impact on research aims and themes and the overall station mission will have long lasting implications on national and international Climate and Climate Action assessments.

Robert Kennedy

From: O Connor, Denis <denis.oconnor@universityofgalway.ie>
Sent: 28 November 2023 14:23
To: Robert Kennedy
Cc: Ovadnevaite, Jurgita
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Robert

Just to follow up on the document that we issued last week, note the below summary

University Of Galway note that they have opted not to develop a point-by-point response to MKO's Sceidre Rocks EIAR Scoping Report. Instead, we elaborate in our general submission on the potential impacts of the functioning of the Mace Head Atmospheric Research Station, that the major issue of concern by the Project, as highlighted in Section 9.7 (pages 167-168) of the report, and of duration extending through all stages of the Project's life cycle (i.e. Construction, Decommissioning Operation and Maintenance) in the submission entitled "***On the Potential Impact of the Off-Shore Sceidre Rocks Wind Farm upon the Credibility of Baseline Monitoring Status: Mace Head Atmospheric Research Station***".

Our submission, the assessment of the potential impact on the functions of Mace Head Atmospheric Research Station, and our major conclusion, remains the same: ***Sources of pollution and perturbations to the natural system within the Mace Head measurement footprint area render it not fit for purpose as a baseline station – there is no tolerance in gradation acceptable: i.e., any small source of local pollution, however small or short, will alter the natural conditions and diminish the importance of the measurements, observations and resulting assessments, which is in addition to the perturbations to the natural system (including wind, wave fields, natural emissions, cloud formation and precipitation).***

Regards

From: O Connor, Denis
Sent: Wednesday 22 November 2023 14:35
To: Robert Kennedy <rkennedy@mkoireland.ie>
Cc: Ovadnevaite, Jurgita <jurgita.ovadnevaite@universityofgalway.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Robert

Please find attached a report that we have conducted showing the impact of the proposed scheme on the weather station located at Mace Head.

Our research team plan to provide a separate response to your document and I will share as soon as received

Regards

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 3 November 2023 16:06
To: O Connor, Denis <denis.oconnor@universityofgalway.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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RÍOMHPHOST SEACHTRACH: Níor tháinig an ríomhphost seo ó Ollscoil na Gaillimhe. Ná hoscail ceangaltáin agus ná cliceáil ar naisc mura gcreideann tú go bhfuil an t-ábhar sábháilte.

Mr. O'Connor,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, it would be much appreciated. Please note, I attempted to engage with you earlier in the scoping process but did not have an email address for your department. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: 08 September 2023 15:51
To: Robert Kennedy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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A chara,

I acknowledge receipt of the below referral. The Department's reference for this referral is G Pre00218/2023

Le meas,

Joanne

Joanne Lyons
Higher Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigi an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Friday 1 September 2023 16:21
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr Hillis,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Our Ref: **G Pre00218/2023**

(Please quote in all related correspondence)

01/05/2024

MKO
9C Beckett Way
Park West Business Park
Dublin
D12 XN9W
Via email

Re: EIA Scoping Document for the Proposed Sceirde Rocks Offshore Wind Farm

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading(s).

Archaeology

The submission documents have been reviewed by the Underwater Archaeology Unit of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage which is the state body with responsibility for the protection and preservation of archaeological heritage, including underwater cultural heritage, in Ireland and its territorial waters. It has responsibility for, *inter alia*:

Implementing legislation in relation to the protection of monuments and sites, including historic wrecks and underwater archaeological sites.

Regulating archaeological excavations, use of detection devices for archaeological purposes, diving on historic wrecks and on underwater archaeological sites or for archaeological purposes.

Providing advice to planning authorities on development proposals (development plans, heritage plans and individual planning applications) that may have implications for the archaeological heritage.

The role of the NMS Underwater Archaeology Unit (UAU) is to manage and ensure the protection of underwater archaeological heritage. Where OWF projects are concerned, the brief spans underwater and intertidal archaeological heritage as well as marine/underwater built heritage. Terrestrial elements of OWF developments are dealt with by the Licencing and Planning Unit of the National Monuments Service and certain built heritage aspects are dealt



with by the National Built Heritage Service of the Department of Housing, Local Government and Heritage. Applications and consultations, which can include OWF pre-design scoping, various archaeological assessment reports, Underwater Archaeological Impact Assessment (UAIA) reports, EIAs and EIARs are received by the UAU through the Development Applications Unit (DAU).

OWF applications/consultations received are assessed and observations, submissions and recommendations for assessment and mitigation are issued to the relevant applicants/authorities. To ensure consistency, all planning consultations on OWF projects must be channelled through the DAU.

Assessment of consultations received may include a review for approval of UAIA reports, geophysical survey reports, archaeological assessment of geotechnical investigation reports, EIARs, test-excavations reports, built heritage assessments and other reports undertaken as part of the EIA process or for ongoing OWF projects.

- The Department vets all licence applications received, that is, detection device, underwater, excavation or Ministerial Consent applications, including submitted Method Statements (MSs) and requests for extensions. All licence applications should be sent to the archaeological licencing section of the NMS. The NMS will vet, discuss, and approve licence/consent applications and attendant MSs submitted.
- The NMS will review and may, if necessary, issue observations/comments/further requirements on archaeological reports received pertaining to licenced works.
- Further requirements will be issued by the Department, through the DAU.
- The NMS may carry out inspections of licenced archaeological works to ensure that they are being undertaken in compliance with the conditions of licences, consents and the methodologies described in their attendant method statements.
- The Department will review and provide feedback on all information submitted pertaining to OWF projects, including early or pre-design scoping documentation.
- The Department may be invited to attend pre-design scoping meetings and workshops to become better informed on a scheme, to discuss same and to engage with the main stakeholders.

It is noted there have been a series of prior engagements between the Department and the Sceirde Rocks OWF project design team and we would welcome further comprehensive engagement as the EIAR is being progressed. The Department has also submitted observations to Foreshore Investigative Licence Applications FS07161 and FS07543 these remain relevant.

Please note this submission provides general recommendations relating to the assessment of underwater cultural heritage for the EIAR and should not be taken to infer approval of the project by this Department. The Department will comment in detail on subsequent consultations and submissions.



Scope of Underwater Cultural Heritage in EIAR

In defining the scope of the EIAR it is vital that the entirety of what constitutes underwater cultural heritage is reflected in its content. The UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage defines underwater cultural heritage as ‘all traces of human existence having a cultural, historical or archaeological character which have been partially or totally under water, periodically or continuously, for at least 100 years such as:

- (i) sites, structures, buildings, artefacts and human remains, together with their archaeological and natural context;
- (ii) vessels, aircraft, other vehicles or any part thereof, their cargo or other contents, together with their archaeological and natural context; and
- (iii) objects of prehistoric character.’¹

The Historic and Archaeological Heritage Act provides for the enabling of ratification of the Convention.

In determining the scope of underwater cultural heritage in the EIAR it should be noted that Section 3.3.6 of the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (Environmental Protection Agency 2022, 32) states that EIAR Cultural Heritage chapters should contain the following:

Cultural Heritage

Archaeology

Known archaeological monuments

Areas of archaeological potential (including unknown archaeology)

Underwater archaeology

Architectural heritage

Designated architectural heritage

Other significant architectural heritage

Folklore and history

Designations or sensitivities

The Landscape

Landscape Appearance and Character

Landscape Context

Views & Prospects

Historical Landscapes’.

¹ <https://en.unesco.org/about-us/legal-affairs/convention-protection-underwater-cultural-heritage>



Furthermore, Section 3.6.4 of *Frameworks and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) document states in relation to the scope of archaeological assessments that they:

‘may, as appropriate, include documentary research, field-walking, examination of upstanding or visible features or structures, examination of existing or new aerial photographs or satellite or other remote sensing imagery, geophysical survey, topographical assessment, general consideration of the archaeological potential of the area or areas effected by a development based on their environmental characteristics, or archaeological testing.’

Section 1.1 of the same document specifically notes that

‘... date is not in itself a determinant of archaeological significance or interest. Any material remains which can contribute to understanding past societies may be considered to have an element of archaeological significance’.

Therefore, it is vital that the scope of an OWF EIAR needs to include the broadest gamut of underwater cultural heritage to be sufficiently accurate to provide a reliable reference against which effects of a project can be assessed. The following constitutes some of the key elements of underwater cultural heritage that require detailed assessment in the EIAR.

Wrecks

Ireland’s long and varied maritime history has bestowed extensive records for shipwrecks along its coast and offshore waters (and freshwater environments). With over 18,000 documented losses, shipwrecks are the most abundant type of underwater archaeological site found in Irish waters. Wrecks include ancient logboats and wooden sailing, fishing and trading vessels, steamships, ocean-liners and ships and submarines connected with both world wars. Many contain relic cargoes, objects and human remains.

The Underwater Archaeology Unit (UAU) has compiled an inventory of recorded historic wrecks - the Wreck Inventory of Ireland Database - for the coastal and inland waters of Ireland. Records from the database are available to view through the Department’s web site (<https://www.archaeology.ie/underwater-archaeology/wreck-viewer>). It is important to note that the Wreck Viewer displays only wrecks for which there is a recorded location and these are represented on the map canvas as red dots. Due to the nature of the available primary and secondary source material pertaining to wrecks, the vast bulk of these relate to the eighteenth-twentieth centuries, but this should not be taken to infer that losses belonging to earlier periods are not present. Similarly, wrecks with known locations account for only approximately 22% of the total number of records contained in the WIID; there is data held within the WIID on a large number of wrecks for which we have no precise recorded location, co-ordinate or known extent. Information on these wrecks is not displayed in the viewer but is available from the Wreck Viewer.



In compiling the EIAR it is vital, therefore, that all recorded (located and unlocated) losses from the study area and its environs are comprehensively assessed by reviewing the WIID, relevant primary and secondary archival sources, results of geophysical and bathymetric surveys, prior archaeological investigations, local information and other relevant sources in order to determine, as accurately as sources allow, the locations and attendant zones of potential, of all historic wrecks. Assessment should also include areas of high potential for previously unrecorded shipwreck sites within the OWF study area – eg. sandbanks, areas of high concentration of recorded wrecks.

Submerged prehistoric sites and palaeolandscapes

Submerged prehistoric landscapes are areas that were formerly dry land that have been submerged as a result of both long-term and short-term processes of environmental change, most commonly sea-level rise since the retreat of the British and Irish Ice Sheet c. 26 ka. Sea levels during the Last Glacial Maximum were as much as 40-16 m lower than the present day, exposing large areas of what is now sea to human habitation. Isostatic lift has also created raised beaches and relic sea caves that have provided contexts for early prehistoric archaeology.

Evidence of Ireland's drowned landscapes and settlements is distributed across the entire coastline and there are presently some fifty sites where submerged archaeological sites and/or objects have been documented. The relatively small number of sites is probably due to lack of research, as much as taphonomic issues. Identified sites are mainly intertidal find spots or small collections of flint artefacts but monuments are also represented. A small number of fully subtidal sites are known, generally from nearshore regions and consisting, with one exception, of isolated single finds. In addition, there are numerous areas of intertidal and sub-tidal submerged forest and peat deposits around the coast and drowned rivers/lakes.

Information on submerged archaeological sites and objects is available from a broad range of sources, including the RMP/SMR, published secondary sources, the topographical files of the National Museum of Ireland and from prior archaeological investigations. However, these sources are not exhaustive and detailed primary research and fieldwork is required to facilitate further identifications. Geophysical and geotechnical investigations undertaken for OWF projects have the potential to realise a large body of new information on submerged archaeological sites and landscapes and this requires integration into all such investigations. Submerged palaeolandscapes should be regarded as being of high archaeological potential and are of intrinsic archaeological significance due to the palaeoenvironmental evidence they contain. It is vital therefore that they are accorded comprehensive assessment in EIARs.

Maritime and coastal built heritage

Maritime and coastal built heritage requires comprehensive assessment in the compilation and content of the EIAR. This is particularly important in the optioneering and assessment of



locations where cable routes and their associated structures make landfall. As foci for trade routes historic coastal towns are typically associated with concentrations of historic wrecks and associated elements such as relic cargoes and anchors. Maritime trade required extensive port infrastructure including harbours, lighthouses and other navigation aids, piers and jetties, landing stages. Infill (such as dredged spoil) used to reclaim areas of former estuarine floodplain may retain cultural material, including archaeological objects, the remains of abandoned vessels ('hulks') and wrecks used as part of the reclamation process or buried in the underlying original sediments. Similarly, infrastructure relating to past economic exploitation of the coastal areas for fish, shellfish, sea-weed, salt and other natural resources necessitated infrastructure that leaves an archaeological and built heritage legacy in the form of, for example, fish traps, fish weirs, shell middens and kelp grids. The frequency of certain types of monuments and objects within a given landscape forming the study area for an OWF can be strong indicators of previously unknown sites and artefacts remaining within proposed project areas. Assessment of archaeological potential, therefore, is not just site specific but must also include the landscape within which monuments are located, including watercourses and coastal areas.

Many of the site-types noted above are included in the RMP/SMR and Record of Monuments and Places/Sites and Monuments Record, National Inventory of Architectural Heritage and Record of Protected Structures (for a given county), but there are also likely to be sites that have not been previously recorded in these sources and their identification requires specific research that utilises a range of archival source material (e.g. historic maps, historic aerial photographs, port records, oral histories, archaeological investigation reports) and field investigations such as intertidal surveys. An indicator of the potential for the occurrence of maritime heritage is also provided by the annual Excavations Bulletin which contains brief accounts of excavations conducted in Ireland each year; these reports are also at www.excavations.ie. Report references up to 2022 are searchable on the NMS Finding Aid spreadsheet and the reports can be requested from NM Archives. Information on occurrences of chance finds of archaeological objects is also a useful indicator of archaeological potential – information may be obtained from the National Museum, local museums, and primary and secondary archival sources.

Statutory Protections on Underwater Cultural Heritage

The Minister for Housing, Local Government and Heritage is charged under the National Monuments Acts 1930 to 2014 with a range of functions regarding the protection of monuments, wrecks and archaeological objects, including the regulation of activities that impact upon underwater cultural heritage. The 1987 Amendment Act directly addresses the protection of underwater archaeology, which can be particularly relevant to OWF projects. The Acts extend as a minimum to the whole area of the State, including inland and internal waters and the Territorial Sea (the "12 mile limit"). In addition, activities within what is known as the Contiguous Zone (the "24 mile limit") require compliance with the provisions of the legislation relating to legal protection for wrecks over 100 years old and underwater archaeological objects. In September 2023 the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 was signed into law by the President. It is envisaged that



the legislation will be commenced in the coming period but in the interim the National Monuments Acts 1930 to 2004 apply.

The provisions of the National Monuments Acts 1930 to 2014 that are applicable to the assessment, mitigation and construction stages of OWF projects include the following:

Works at or in relation to a site or monument recorded under Section 12 of the 1994 National Monuments (amendment) Act or registered under Section 5 of the 1987 National Monuments (amendment) Act must not take place unless two months' notice has been given to the Minister for Housing, Local Government and Heritage, except in cases of urgent necessity and with the consent of the Minister.

With very limited exceptions, all archaeological excavation (wherever occurring and regardless of whether directed at a known archaeological site or monument) requires an archaeological excavation licence under Section 26 of the National Monuments Act 1930, unless conducted under a Ministerial Consent under Section 14 of the 1930 National Monuments Act (where a proposed archaeological excavation requires a consent under Section 14 of the 1930 National Monuments Act, it will be dealt with under that section, and not under Section 26 of the 1930 National Monuments Act).

The diving on, survey of, or interference with, wrecks of 100+ years old or underwater archaeological objects requires a licence under Section 3 of the 1987 National Monuments Act.²

Wrecks that are less than 100 years old and the potential location of wrecks or underwater archaeological objects may also be protected under Section 3 of the 1987 National Monuments (amendment) Act by the placement of an underwater heritage order if the wreck, area, or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection.

The use of a detection device to search for archaeological objects (or the possession of such a device on a monument protected under the National Monuments Acts 1930 to 2014) is prohibited without a consent under Section 2 of the 1987 National Monuments (amendment) Act.

Section 2 of the 1987 National Monuments (amendment) Act prohibits the possession of a detection device (including geophysical survey equipment) in or at the site of a Recorded Monument or National Monument of which the Minister for Housing, Local Government and Heritage or a local authority is the owner or guardian, or which is subject to a Preservation Order under the National Monuments Acts.

² It should be also noted that many wrecks are also the last resting places of people who perished when the vessel was lost and they should, accordingly, be treated with the utmost respect within the context of OWF development proposals. This may include appropriate liaison with descendants and local communities.



The interference with, or alteration of ground, within, around, or in proximity to a National Monument of which the Minister for Housing, Local Government and Heritage or a local authority is the owner or guardian, or which is subject to a Preservation Order under the National Monuments Acts (and also ground disturbance around or in proximity to any such monument in state care), requires a consent under Section 14 of the 1930 National Monuments Act.

Finds of archaeological objects made other than during licensed archaeological excavations or underwater dive/surveys, or during activity carried out under a Section 14 1930 National Monuments Act consent, must be reported to the National Museum of Ireland (NMI) within 96 hours and must not interfered with (Section 23 of the 1930 National Monuments Act).

Alteration of an archaeological object requires a licence (Section 24 of the 1930 National Monuments Act).

The export of archaeological objects requires a licence under Section 49 (7) of the National Cultural Institutions Act 1997.

Applications for excavation, survey, dive/survey licences and detection consents should be made to the National Monuments Service.

Considerations in Archaeological Assessment of OWF Projects

OWF projects can have a significant effect on a broad range of underwater cultural heritage, which should be comprehensively addressed through the archaeological assessment process. An archaeological assessment and mitigation strategy for a proposed OWF project, including for design and geophysical and geotechnical investigations, and for enabling works and construction activities, should primarily aim to avoid or reduce effects on the underwater cultural heritage. The risk of adverse effects on underwater cultural heritage can be reduced through carrying out mitigation as early as possible and assessment should also inform the design of a given scheme with reasonable alternatives that achieve the maximum amount of preservation in situ of underwater cultural heritage.

Each phase of an OWF requires its own approach and strategy for archaeological assessment and mitigation. As each stage reaches completion, the archaeological strategy and mitigation in place may need to continue onto the next stage or be expanded in the event, for example, that new discoveries are made that warrant additional archaeological inputs. Assessment recommendations, with appropriate avoidance or mitigation measures, require implementation regardless of whether the assessment took place before or after a grant of approval for an OWF. As geophysical and geotechnical investigation works are generally undertaken before a project receives approval, they will require separate screening, assessment, and Section 12 of the National Monuments Act 1930 notification and monitoring, as set out in an assessment report to be submitted and agreed with the NMS.



For each OWF a detailed assessment of underwater cultural heritage, undertaken by suitably qualified and experienced specialists, is required during the pre-design and/or design phase, as part of the EIA process. The purpose of such assessments is to identify, describe and assess the likely significant effects on underwater cultural heritage resulting from, *inter alia*, the construction and operation of a project. This is to ensure that any significant adverse effects can be avoided, reduced or offset, and that mitigation measures can be embedded into the design, wherever possible.

Assessment should address direct and indirect effects on underwater cultural heritage, both positive and negative, and should include issues such as geophysical and geotechnical investigations, all enabling works, vibration, hydrological change, and any cumulative effects. In many cases, cumulative or indirect (secondary) impacts and enabling works may be more significant than direct impacts from a project. Similarly, impacts on the setting of archaeological monuments and on views to and from monuments arising from OWF projects should be assessed and mitigated, where necessary. This is particularly important where there is the potential for the setting of a World Heritage Site (or tentative list World Heritage Site) or National Monument, to be affected by an OWF project.³

Any interactions between impacts on underwater cultural heritage and other environmental factors should also be documented for each underwater cultural heritage asset and captured in a matrix of interactions (for example, an archaeological monument may have amenity value, which would need to be assessed under Population and Human Health in the EIAR). The description of effects should be precise and concise and focus on effects that are probable or likely to occur, including the reasonably foreseeable worst-case scenario. Discussion of negligible effects should be avoided.⁴ Assessment should also include a description of proposed mitigation measures for a given programme of works, consideration of a do-nothing scenario, and alternatives to avoid or reduce significant adverse effects.

Underwater Cultural Heritage in the EIAR

The EIAR chapter on Underwater Cultural Heritage should include a description of the full gamut of underwater cultural heritage (as described above), a synthesis of all prior investigations and assessments and a detailed impact statement and mitigation recommendations. Detailed final reports on all prior investigations should be included as appendices. The chapter should include, as a minimum, the following:

A synthesis of desktop study to include historical and cartographic research, research on primary and secondary archival sources, and the results of a review of the Wreck Inventory of Ireland Database, Record of Monuments and Places/ Sites and Monuments Record, National Inventory of Architectural Heritage and the Record of Protected Structures.

³ UNESCO Guidance on Wind Energy in World Heritage Context <https://whc.unesco.org/en/wind-energy/>

⁴ Further information on describing effects is given in the Environmental Protection Agency (EPA's) *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2022). Available for download at: <https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php>



A synthesis of all underwater surveys, intertidal surveys and any other assessments undertaken.

An inventory of all underwater cultural heritage assets, including wrecks, submerged palaeolandscapes, archaeological features/deposits, sites/monuments, or objects and marine built heritage. All sites should be accompanied by mapping with associated geospatial data; where possible, the full (known/predicted) extent of archaeology identified should be mapped using polygons. For ease of use each item, regardless of designation, should be numbered using a sequential system of identifiers.

A detailed Impact Statement, which includes drawings/mapping that clearly show impacts/effects, and recommendations for appropriate mitigation of any adverse impacts and effects to known or potential archaeological heritage.

OWF projects can lead to significant adverse effects on a broad range of underwater cultural heritage (see above), requiring comprehensive and proactive mitigation informed by a comprehensive archaeological assessment process. It is national policy, as set out in the *Frameworks and Principles for the Protection of the Archaeological Heritage* that ‘there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage’ and it is essential that this overarching, core principle is proactively embedded within the design process. Assessment and an attendant mitigation strategy should therefore aim to avoid or reduce effects on the underwater cultural heritage and inform the design of a given scheme with reasonable alternatives that achieve the maximum amount of preservation in situ. The risk of adverse effects on archaeological heritage, and attendant cost and delay implications for an OWF project progression, can be reduced through carrying out mitigation as early as possible and ideally in the design stage.

Each phase of an OWF requires its own approach and strategy for archaeological mitigation, as guided by the assessment. As each stage towards EIAR completion reaches completion, the archaeological strategy and mitigation in place may need to continue onto the next stage or be expanded in the event, for example, that new discoveries are made that warrant additional archaeological inputs.

Once the likely direct, indirect and cumulative impacts and effects on underwater cultural heritage have been identified and assessed, measures to mitigate any adverse effects should be devised and embedded within the overall EIAR. EIARs will include a Schedule of Environmental Commitments detailing specific measures to be undertaken to mitigate any adverse effects on underwater cultural heritage. The archaeological elements of the Schedule of Environmental Commitments should be reviewed in advance of EIAR submission to the planning authority by the Department as part of the consultative process. The Schedule of Environmental Commitments should comprise of a list of relevant measures that the OWF developer is obligated to undertake to mitigate adverse effects. It is in the developer’s interest to ensure that all undertakings to mitigate are fully understood and accepted and that the resources are available to ensure compliance with such commitments



(such as preservation in situ, test-excavations, monitoring, archaeological excavation, post-excavation requirements and, where relevant, publication of results and other forms of dissemination).

Mitigation by Avoidance ('Preservation in situ')

When no impact is caused, often through consideration of alternatives (that is, a design solution), mitigation by avoidance/preservation in situ is achieved. This is generally the most time- and cost-effective form of impact mitigation. Preservation in situ of underwater cultural heritage, and all cultural heritage assets, should be a primary objective of the archaeological heritage assessment component of OWF projects. This approach is embedded in the EIA process and across other established guidance, including the *UNESCO Convention on the Protection of the Underwater Cultural Heritage* and its Annex Rules and the *UNESCO 1992 Convention for the Protection of the Archaeological Heritage of Europe* (revised). It is also consistent with government policy as outlined in the *Framework and Principles for the Protection of the Archaeological Heritage* (DAHGI 1999, 33), which requires a presumption in favour of avoidance of impacts.

Mitigation by avoidance should occur, to the greatest extent possible, during the OWF project pre-design or design phases, when the presence, location, and extent of archaeological or other cultural heritage assets are known (such as recorded sites or those identified during SI works).

Avoidance will, in general, be designed into the OWF design at an early stage, and may require defined Archaeological Exclusion Zones, buffers, vibration monitoring and periodic inspection. The extent of an Archaeological Exclusion Zone is dependent on the character and extent of the underwater cultural heritage asset requiring its implementation and each case requires bespoke exclusion zones, based on the fullest understanding of the asset. For example, a 50m long wreck may have an extensive, 200m radius debris field associated with it. In order to protect it in its entirety an exclusion zone of 300m radius from the centre of the wreck will be required.

Whilst it is essential that the implementation of Archaeological Exclusion Zones will have been finalised as part of the EIA process, due to practical concerns it may be necessary to carry out additional, post-consent, investigations in order to facilitate preservation in situ of underwater cultural heritage. Investigations may be required in order to characterise and determine the full extent of an underwater cultural heritage asset. Such investigations may include further archival research, geophysical surveys, dive surveys, metal detection surveys, Remote Operated Underwater Vehicle surveys and underwater test-excavations. In addition, archaeological dive surveys may be required to ensure areas to be impacted upon by construction works and pre-lay grapnel runs are devoid of underwater cultural heritage. Where these mitigations are required they should be itemised clearly within the Schedule of Environmental Commitments.



Preservation in situ may also be used where archaeology discovered during construction can be preserved with suitable measures, such as changing the construction design, avoiding impacts using buffer zones, physical protection, once this is agreed with the NMS (and the NMI, where relevant). However, preservation in situ after the discovery of archaeological heritage within construction stage will normally require a variation to the design and construction, which can be costly and impact on the programme of works, and should therefore be avoided, where possible, through adequate prior archaeological assessments. This is particularly critical when dealing with sites underwater.

Mitigation by Remedy/Offsetting ('Preservation by Record', Archaeological Monitoring)

Mitigation by remedy/offsetting is achieved when an adverse effect is compensated for by a remedial action and balanced by a positive effect. For example, gaining and disseminating new knowledge of the past from archaeological excavation or carrying out conservation works on a maritime built heritage structure that is effected, can be considered as mitigation by remedy/offsetting.

Mitigation by remedy or offsetting may be the only option available for OWF projects that cannot avoid significant adverse effects on underwater cultural heritage due to their need to be located on a particular site or within a particular area. However, it is essential that all reasonable alternatives to adverse impacts are fully explored by the design team before this form of mitigation is proposed and it is advisable to consult with the National Monuments Service when this scenario arises.

The two forms of archaeological mitigation by remedy/offsetting are archaeological excavation ('preservation by record') and archaeological monitoring.

Archaeological Excavation ("Preservation by Record")

Where underwater cultural heritage, for example wrecks, submerged settlement sites or historic piers, require removal due to OWF development then it is essential that the approach of preservation by record be applied, i.e. that appropriate archaeological excavation and recording take place. Where adverse impacts on underwater cultural heritage cannot be avoided, a full excavation should be carried out to mitigate the impact of the works by preserving the archaeological remains to be impacted upon (with an appropriate buffer) by record.

Preservation by record is a mitigation of last resort and this principle is an important part of state policy in relation to archaeological heritage. Where underwater cultural heritage is concerned, archaeological excavation can be logistically complex, resource intensive and costly for both excavation and post-excavation phases of a project. Therefore, all reasonable options to avoid impacting upon underwater cultural heritage must be first considered, and only when these alternatives have been proven unviable in the judgement of the NMS will preservation by record be permitted. Before an approval is provided for full archaeological excavation the NMS will require sufficient evidence that all options for preservation in situ



have been exhausted. Mitigation relating to residual impacts of the excavation on remaining archaeological deposits/features/structures may also need to be addressed.

It is stated in the Department's *Policy and Guidelines on Archaeological Excavation* (1999),⁵ in all cases the proposed methods of excavation must be appropriate to the types of archaeology within the site and designed to maximise the amount of new knowledge of the past – the 'research dividend' - that can be obtained from the archaeological investigation. The methodology to be used in the excavation should be informed by any prior desk based study and assessments, field survey, and other investigations such as geophysical surveys, historical research, and archaeological test investigations.

The methodology for the excavation will require approval as part of the archaeological licensing process or Ministerial Consent process (National Monuments Acts 1930 to 2014). A licence must be applied for with a site-specific methodology that outlines the strategy to be employed during the proposed excavation. Such a strategy, as outlined in the Department's *Policy and Guidelines on Archaeological Excavation* (1999), should include (at a minimum) information under the following headings:

Archaeological and historical background to the proposed excavation.

Archaeological research priorities of the proposed excavation, based on prior research, historical and archaeological background.

The size, location, and scope of the proposed excavation.

The methods of underwater excavation envisaged, to include how the site will be excavated to maximise recovery methods (for example by hand-tools or by suction dredge with sieving of spoil on the surface). How structures/features/deposits/objects will be surveyed on site.

The proposed artefact-recovery strategy (metal detection is a standard requirement on all OWF related excavations) and how material will be safely recovered (in accordance with *Standards for the care and treatment of archaeological objects from excavations* (National Museum of Ireland, April 2022)).

Proposed sampling strategies and proposals for dealing with organic materials and human remains in the event of them being encountered.

Details on the size and experience of the underwater archaeological dive team.

How the site will be protected during downtime until excavation has been completed.

The proposed publication/public dissemination programme.

⁵ <https://www.archaeology.ie/sites/default/files/media/publications/excavation-policy-and-guidelines.pdf>



Archaeological Monitoring

Archaeological monitoring is generally undertaken following prior archaeological assessments being carried out for the EIAR/UAIA, with the objective of identifying and protecting previously unidentified underwater cultural heritage, archaeological deposits, features, structures, objects, wrecks, and other materials which may be encountered or otherwise affected by the OWF works.

As archaeological monitoring is generally undertaken during the construction programme, it is essential that it is not carried out as a primary means of mitigation but rather as a method of dealing with any residual risks to underwater cultural heritage that remain following the completion of prior assessments and mitigations. When archaeology is discovered during monitoring of construction works it can often lead to delays whilst the impacts are mitigated. It is critical that, where possible, detailed cultural heritage assessments and mitigations are carried out to identify and manage these risks. For OWF projects archaeological monitoring can include (but is not limited to):

Monitoring of sub-tidal/intertidal excavations of the seabed relating to construction activities.

Monitoring of geotechnical investigations.

Monitoring of dredging works.

Monitoring of dredged spoil through metal detection assessment.

Periodic/intermittent monitoring.

All archaeological monitoring should be carried out under licence. This will ensure that there are no avoidable delays arising from the subsequent application for a licence to mitigate the impacts of the development on any archaeology that may be discovered. If the impacted archaeology is under water, both a Section 26 (National Monuments Act 1930) licence and Section 3 (National Monuments Act (amendment) 1987) licence may be required (see Section 3.2).

In certain cases, the archaeological monitoring methodology for an OWF project should include the archaeological assessment of dredged/excavated spoil that is removed from the seabed. This material, particularly in proximity to urban areas, can be very rich in archaeological materials and objects, including organic materials. It is generally the approach of the Department, in consultation with the NMI, that dredged spoil is assessed by means of spreading, searching for objects, and metal detection (for metal objects). In order for artefacts to be accurately provenanced, where practicable, searching and metal detection should take place before bulk excavations occur, for instance where intertidal areas have been temporarily exposed. The following general approach is applied on a case-by-case basis, where dredged spoil is being removed off-site:



100% volume assessment of spoil – all spoil from areas being dredged within the Zone of Archaeological Potential for an historic town, within or in proximity of a wreck or of a Zone of Notification of a Recorded Monument, at or near a monument that is subject to Section 14 of the National Monuments 1930-2014 Acts, or in areas that are traditionally known to have high potential to contain underwater cultural heritage (e.g areas where there are concentrations of shipwrecks).

25% volume assessment of spoil from all other areas.

Scaling of assessment of dredged spoil. In general, the Department will consider the scaling up or down of 25% volume assessment of the dredged spoil based on the artefactual retrieval results over an agreed time.

Sufficient archaeological personnel need to be on site to monitor all aspects of works for an OWF project. To illustrate the need for adequate provision of competent and experienced personnel, and to highlight areas that need consideration when undertaking such work, archaeological monitoring of dredging/excavation operations may include some or all the following and may have some or all the associated requirements:

Underwater activities and requirements

Activity	Requirements
24-hour Monitoring	Sufficient archaeological personnel to cover monitoring works.
Archaeological Excavation	A full archaeological excavation/underwater team if the site/feature/object cannot be avoided following inspection.
Communications	A communications strategy to ensure that the plant operator will suspend dredging/excavations if potential archaeology is identified.
Dredged Spoil	Management of the archaeological team to assess dredged spoil.
Finds Recovery	A methodology to identify, locate, recover and record find locations; and to assess if the artefacts are associated with an archaeological site or are isolated finds.
High-level Management	Liaison with the developer, relevant consultants and service providers (project archaeologist, planning authority, works contractor, archaeological contractor, plant operators and own archaeological team).
Multiple Dredging Works	Multiple monitoring archaeologists.
Post-excavation Works	As per standards for all archaeological excavation, with added interpretation of underwater finds and discoveries. Specialist analysis and conservation for waterlogged finds.



Reporting	Dedicated Dredge Monitoring Report to form part of Final Report.
Team Management	Coordinating archaeological monitoring team to cover multiple plant and machinery; daily logs; regular reports.
Underwater Discovery and Mitigation	Rapid archaeological dive inspection by suitably qualified and experienced underwater archaeologists to assess archaeology and to secure site/feature/artefacts pending agreed further mitigation.
Waterlogged Material	Recovery of material that requires rapid first-aid and temporary storage in suitable holding tanks of water.
Offshore	Monitoring archaeologists should be on/near the dredge plant to monitor the works.

Follow-up Inspections

There may be a need for periodic follow-up inspections after the main works have been completed on an OWF project, as part of the agreed mitigation. These may be required to assess the effectiveness of certain mitigation measures that were put in place (for example, stabilisation mechanisms for underwater sites or features) or to inspect newly discovered sites/features/objects that were preserved in situ to ensure that no unforeseen residual impacts are occurring.

Project Archaeologist

As is recommended by this Department in relation to all substantive development schemes, such as the project in question, it is advised that the a Project Archaeologist(s) be appointed to oversee and advise on all aspects of this scheme from design, through EIAR compilation to construction.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford, Y35 AP90

Is mise, le meas

Joanne Lyons
Development Applications Unit
Administration

Robert Kennedy

From: Info Opw <info@opw.ie>
Sent: 04 September 2023 11:47
To: Robert Kennedy
Subject: Automatic reply: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Thank you for your email to the Office of Public Works.
Your query has been forwarded to the relevant section within the OPW for direct reply.
If you do not receive a response within 20 working days, please email this address again for further assistance.

All Media queries should be emailed to pressoffice@opw.ie

This is an automated response. Please do not respond to this email.

Go raibh maith agat as an ríomhphost uait chuig Oifig na nOibreacha Poiblí.
Seoladh do cheist chuig an rannóg chuí taobh istigh den OPW a thabharfaidh freagra díreach duit.
Sa chás nach bhgaigheann tú freagra taobh istigh de 20 lá oibre, seol ríomhphost chuig an seoladh seo arís le do thoil, chun cúnamh breise a fháil.

Ba chóir ceisteanna meáin a sheoladh trí ríomhphost chuig pressoffice@opw.ie

Is freagra uathobrithe é seo. Ná seol freagra ar an ríomhphost seo le do thoil.

Communications

Oifig na nOibreacha Poiblí
Office of Public Works

Sráid Jonathan Swift, Baile Átha Troim, Co na Mí, C15 NX36
Jonathan Swift Street, Trim, Co Meath, C15 NX36

T +353 46 942 6000
<https://gov.ie/opw>

Email Disclaimer: <https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/>

Robert Kennedy

From: Drainage Admin <drainage.admin@opw.ie>
Sent: 25 October 2023 09:31
To: Robert Kennedy
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

You don't often get email from drainage.admin@opw.ie. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Robert,

Thank you for your email, which was sent to The Office of Public Works (OPW) regional drainage maintenance office who have provided the following comments:

If any new culverts or bridges (or modifications to any existing culverts or bridges) are required to cross watercourses as part of the development or on proposed or existing access roads to serve or access the development, you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.

Further information on the process including copies of the appropriate application form and brochure are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>

Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 100 year flood), increased by 20% to cater for the effects of Climate Change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.

You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.

With regard to any proposed Grid Connection Route which may cross several watercourses. If the cable and ducting are to be buried in the road, as they cross bridges over the water courses, and there is no interference with the opening in the bridge spanning the watercourse, then there is no issue. On the other hand, if it is proposed to pass the cable in its ducting through the opening of any bridge or culvert, this would be considered to be a modification of a bridge and it would require the consent of the Commissioners under Section 50 as mentioned above. Similarly, if it is proposed to carry the cable in its ducting across watercourses on new support structures spanning the watercourses, these should be treated as if they are bridges, and the consent of the commissioners under Section 50 should be obtained. If the cable and ducting is to be buried under the natural bed of the watercourses being crossed, Section 50 would not apply, and we would recommend that the duct be buried a sufficient distance below the natural bed to allow for erosion and mobility of the stream bed.

Please use the following reference number **385- 2023** in any further correspondence with the office on this matter.

Kind regards
Karen

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday 19 October 2023 11:07
To: Info Opw <info@opw.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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From: Robert Kennedy
Sent: Monday, September 4, 2023 11:46 AM
To: 'info@opw.ie' <info@opw.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in

the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Robert Kennedy

From: Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>
Sent: 19 October 2023 14:28
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

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Good day Robert.

I have taken a look at the document, and it is substantial and seems to cover all areas, I will examine the document more closely early next week, at the first glance it looks to me to cover all areas and I wouldn't have anything to add to it.

Le dea mhéin,

Ciaran Seoighe



**An Roinn Talmhaíochta,
Bia agus Mara**
Department of Agriculture,
Food and the Marine

Captain Ciaran Seoighe | Harbour Master

Lárionad Chuan Iascaigh Ros An Mhíl,
Ros An Mhíl, Co. Na Gaillimhe, H91 NFN1
Rossaveel Fishery Harbour Centre
Ros An Mhíl, Co. Galway, H91 NFN1

www.agriculture.ie | [Ríomhphost ciarán.seoighe@agriculture.gov.ie](mailto:ciarán.seoighe@agriculture.gov.ie)
Fón oifige +353 91 560506

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 1:05 PM
To: Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Ciaran,

That has been sent to your personal email address. Please let me know if there's any issues.

Regards,
Rob

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>
Sent: Thursday, October 19, 2023 12:01 PM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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If you like to send it to my personnel email ciaran.seoighe@yahoo.ie

Le dea mhéin,

Ciaran Seoighe



**An Roinn Talmhaíochta,
Bia agus Mara**
Department of Agriculture,
Food and the Marine

Captain Ciaran Seoighe | Harbour Master

Lárionad Chuan Iascaigh Ros An Mhíl,
Ros An Mhíl, Co. Na Gaillimhe, H91 NFN1
Rossaveel Fishery Harbour Centre
Ros An Mhíl, Co. Galway, H91 NFN1

www.agriculture.ie | Ríomhphost ciaran.seoighe@agriculture.gov.ie
Fón oifige +353 91 560506

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:55 AM
To: Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Hi Ciaran,

It appears that I am unable to forward you the scoping document, perhaps due to size limit restrictions placed on your email inbox. Can you suggest another way that I can issue the document to you that would be convenient?

Many thanks,
Rob

Robert Kennedy
Environmental Scientist

MKO

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Business Park, Dublin, D12 XN9W



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From: Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>
Sent: Thursday, October 19, 2023 11:45 AM
To: Robert Kennedy <rkennedy@mkoireland.ie>
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Good day Robert.

Could you please send me the scoping document?

Le dea mhéin,

Ciaran Seoighe



**An Roinn Talmhaíochta,
Bia agus Mara**
Department of Agriculture,
Food and the Marine

Captain Ciaran Seoighe | Harbour Master

Lárionad Chuan Iascaigh Ros An Mhíl,
Ros An Mhíl, Co. Na Gaillimhe, H91 NFN1
Rossaveel Fishery Harbour Centre
Ros An Mhíl, Co. Galway, H91 NFN1
www.agriculture.ie | Ríomhphost ciarán.seoighe@agriculture.gov.ie
Fón oifige +353 91 560506

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:08 AM
To: RossaveelFHC <RossaveelFHC@agriculture.gov.ie>; Seoighe, Ciaran <Ciaran.Seoighe@agriculture.gov.ie>

Cc: Órla Murphy <omurphy@mkoireland.ie>

Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr. Seoighe,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Monday, September 4, 2023 2:03 PM
To: rossaveelfhc@agriculture.gov.ie; ciaran.seoighe@agriculture.gov.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Mr Seoighe,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

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Robert Kennedy

From: Paul Hennessy <paul.hennessy@snnairportgroup.ie>
Sent: 04 September 2023 15:50
To: Robert Kennedy
Subject: RE: [External] 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Importance: High

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert,

I can confirm receipt of the Scoping Document and have forwarded to counterparts in AirNAV Ireland for info and comment purposes.

Should we have comments we will be in touch.

Brgds,

Paul



Paul Hennessy

Safety Compliance & Environment Manager



061 712471 / 087 2382453



www.SNNAirportGroup.ie



Shannon Airport, Co. Clare, Ireland, V14 EE06

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: 04 September 2023 13:10
To: Comments <comments@shannonairport.ie>
Cc: Paul Hennessy <paul.hennessy@snnairportgroup.ie>; Órla Murphy <omurphy@mkoireland.ie>
Subject: [External] 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: 27 September 2023 16:58
To: Robert Kennedy; Landuse Planning
Cc: Órla Murphy
Subject: TII23-124323 Sceirde Rocks Offshore Wind Farm - EIAR Scoping
Attachments: TII23-124323 - Sceirde Rocks Offshore Wind Farm - Scoping - Connemara Galway.docx

Follow Up Flag: Follow up
Flag Status: Flagged

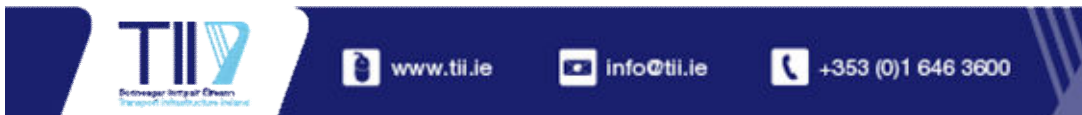
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Dear Mr. Kennedy,
I attach TII's observations on Sceirde Rocks Offshore Wind Farm.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

Regards

Tara Spain
Head of Land Use Planning .
Transport Infrastructure Ireland.
Email: LandUsePlanning@tii.ie



From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Monday, September 4, 2023 12:28 PM
To: Landuse Planning <LandUsePlanning@tii.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Mr Mills,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Órla Murphy
Senior Environmental Scientist
MKO
Tuam Road
Galway
H91 VW84

by e.mail; omurphy@mkoireland.ie

Dáta | Date
21 March, 2024

Ár dTag | Our Ref.
TII24-126549

Re. Sceirde Rocks Offshore Wind Farm - Scoping - Connemara Galway

Dear Ms. Murphy,

I acknowledge receipt of your e.mail of 13 March, 2024. The contents have been noted. In reply, in the first instance, I advise that Transport Infrastructure Ireland (TII) is not a planning authority. Our core function in relation to national roads is to deliver a modern, efficient and safe network. The Authority has, however, the status of a statutory consultee under planning legislation.

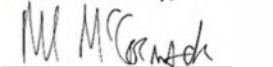
As a statutory consultee, submissions or comments to planning authorities, including An Bord Pleanála, on planning applications, if any, and on proposed development represent TII's primary input to the planning process. The approach adopted in making such submissions or comments seeks to uphold official policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). It is expected that Galway County Council will similarly abide by the provisions of official policy.

As planning and roads authority for the area concerned, any information you consider relevant to the SID application concerned is most appropriately referred to Galway County Council. TII's position remains as set out in TII's EIAR Scoping Response of 28 September, 2023 (TII ref. TII23-124323).

Galway County Council can liaise directly with TII in accordance with established practice, if necessary, to discuss any matters relating to national roads and TII will be available to assist the Council. However, TII is not in a position to engage directly with an applicant for planning consents in the manner requested.

I trust the foregoing is of assistance.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

Robert Kennedy
Environmental Scientist
MKO
9C Beckett Way,
Park West Business Park,
Dublin,
D12 XN9W
Email: rkennedy@mkoireland.ie

Dáta | Date 28/09/23

Ár dTag | Our Ref :TII23-124323

RE: - Sceirde Rocks Offshore Wind Farm - Scoping - Connemara Galway

Dear Mr. Kennedy,

I acknowledge receipt of your correspondence dated 4th of September . In the first instance, I advise that Transport Infrastructure Ireland (TII) is not a planning authority. Our core function in relation to national roads is to deliver a modern, efficient, and safe network. The Authority has, however, the status of a statutory consultee under planning legislation.

TII is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. As a statutory consultee, submissions, or comments to planning authorities on planning applications, if any, on proposed development represent TII's primary input to the planning process. The approach adopted in making such submissions or comments seeks to uphold official national planning policy outlined in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard should also be had to other relevant guidance available at www.TII.ie. It is expected that the planning authorities and the roads authorities for the areas concerning your proposed development, will similarly abide by the provisions of official policy.

The developer is also advised that National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred. Therefore, the developer/scheme promoter should have regard, inter alia, to the following;

1. The onshore elements of the Proposed Development could comprise of
 - One onshore export cable corridor and onshore substation (from landfall to Cashla grid connection);
 - One onshore export cable corridor and onshore substation (from landfall to Moneypoint grid connection).

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It is noted that the landfall location(s) and onward connections will be determined following further studies and consultation, but potential options are initially identified in both Counties Clare and Galway . It appears that it is intended that the onshore cable routes will follow the local and national road system . For national roads , it is observed that it is proposed to use the N67, and also a crossing of the M6. It is also noted that it is anticipated that open-cut trenching for cables laid in ducts will be the primary installation method and that this grid connection cabling will be located within the road infrastructure.

TII advises that grid connection and cable routing proposals should be developed to safeguard proposed road schemes (minor, major or for maintenance) as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.

In the context of the existing national roads network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

There is around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

TII notes the proposed grid connection routing options include a proposed routing along the national roads. The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. The Authority requests referral of all proposals agreed and licensed between the road authority and the applicant which affect the national road network.

2. In the interests of maintaining the safety and standard of the national road network, methods/techniques proposed for any works traversing/in proximity to the national road network should be identified.

TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits, and other licences may be required in connection with the proposed haul route. All structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements, including delivery timetabling, etc. to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

3. Where grid connection involves proposals to cross a motorway Works Specific Deeds of Indemnities, arrangements for third party access or consent from TII in accordance with Section 53 of the Roads Act, 1993, is required. Arrangements for third party access are also likely to be required. Contact should be made to 'thirdpartyworks@tii.ie' to progress this element when proposals for the crossings have been developed.

General requirements for directional drilling under a motorway include;

- The launch and reception pits for the crossing are located outside the Motorway boundary,
- The cabling will be installed at such depth so as not to conflict with the drainage for the Motorway,
- Neither the Works nor the cable crossing will damage or interfere with the Motorway,
- Any maintenance and/or future planned upgrades of the cabling at the crossing location can be carried out without access to the motorway boundary,
- There are no bolted joints in that part of the crossing within the motorway fence-line,
- A pre and post construction survey shall be required along the length of the crossing over the extents of the motorway boundary,
- Specific requirements may also arise for these proposed works.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

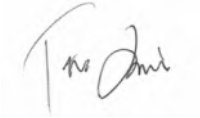
4. The developer, in preparing EIAR, should have regard to TII Publications .
5. It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, the Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs.

6. The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practise.

I trust that the above comments are of use in your EIAR preparation.

Yours sincerely,



Tara Spain,
Head of Land Use Planning.

Robert Kennedy

From: Cillian Claffey (C) <cillian.claffey@water.ie>
Sent: 19 September 2023 09:54
To: Robert Kennedy
Cc: Órla Murphy; Planning
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping
Attachments: UisceÉireann_EIAScopingOpinion_Sceirde Rocks OWF.pdf

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Good morning Robert,

Hope you are keeping well today.

Please find attached Uisce Éireann's response to your EIA scoping request relating to Fuinneamh Sceirde Teoranta Ltd.'s forthcoming planning application for an offshore windfarm in Co. Galway.

Just to note going forward that I am the planning lead for this region (North / West) and will act as interface for Uisce Éireann on this application.

Could you please notify myself OR planning@water.ie upon submission on this application so that we can get a heads up and ensure we receive the referral in adequate time.

If you have any questions, please let me know and I will do my best to assist you with your query.

Kind regards,

Cillian Claffey
Development Management Planning

Mallow
Uisce Éireann
Teach na hAbhann Duibhe, Mala, Co. Chorcaí, P51 K3CX
Uisce Éireann
Blackwater House, Mallow, Co. Cork, P51 K3CX

M +353 89 260 3904
cillian.claffey@water.ie
www.water.ie
[Facebook](#) | [Twitter](#) | [LinkedIn](#)

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Monday 4 September 2023 12:42
To: Planning <Planning@water.ie>; Datarequests <Datarequests@water.ie>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

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Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

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Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eitis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh

a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraíthe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scríos an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraíthe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

For the attention of Robert Kennedy
MKO, 9C Beckett Way,
Park West Business Park,
Dublin,
D12 XN9W

By Email: rkennedy@mkoireland.ie

Date: 19th September 2023

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
D01 WA07
Éire

Uisce Éireann
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Re: EIA Scoping Request – Proposed fixed-bottom foundation offshore wind farm off the West Coast of Ireland with an estimated capacity of 450 megawatts.

Dear Robert Kennedy,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to Fuinneamh Sceirde Teoranta Ltd.'s forthcoming planning application for an offshore windfarm in Co. Galway.

Please see attached, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and the EIA scoping opinions below should be directed to planning@water.ie

PP. *Ali Robinson*

Yvonne Harris

Connections and Developer Services

Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.

All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.

- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.

Robert Kennedy

From: Sabine Browne <Sabine.Browne@waterwaysireland.org>
Sent: 14 September 2023 09:28
To: Robert Kennedy; Cormac McCarthy
Cc: Órla Murphy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Some people who received this message don't often get email from sabine.browne@waterwaysireland.org. [Learn why this is important](#)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning Robert,

This is not within any Zone of Influence of our waterways so we will not be commenting.

Kind regards,

Sabine Browne

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Monday, September 4, 2023 12:49 PM
To: Sabine Browne <Sabine.Browne@waterwaysireland.org>; Cormac McCarthy <cormac.mccarthy@waterwaysireland.org>
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Dear Sir/Madam,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

As part of the EIA process, we would welcome any comments that you may have in relation to the Project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the Project is attached. Please note, the attached Scoping Document is low-resolution due to limits placed on sending email attachments. If you require a high-resolution version, please let me know.

If you could confirm receipt of the Scoping Document and return any comments or suggestions at your earliest convenience, or within the next 6 weeks, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Robert Kennedy
Environmental Scientist

MKO

9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



Offices in Galway and Dublin
mkoireland.ie | +353 (0)1 584 6162

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Robert Kennedy

From: Bernadette White <bwhite@lawaters.ie>
Sent: 19 October 2023 12:02
To: Robert Kennedy
Subject: RE: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Robert,
Thanks for the email. LAWPRO are a national shared service delivering River Basin Management Plan Actions on behalf of Local Authorities. As such we are not a statutory authority and don't make comments on development projects. However, I would recommend that the EIAR ensures appropriate consideration of the draft River Basin Management Plan for Ireland 2022 – 2027, which is due to be finalised in Q4 of 2023.
Best wishes,
Bernie

**Dr Bernadette White | Regional Co-ordinator – West,
& Blue Dot Catchments Programme Manager**
Local Authority Waters Programme (LAWPRO)
M 085 8030094

From: Robert Kennedy <rkennedy@mkoireland.ie>
Sent: Thursday, October 19, 2023 11:16 AM
To: Bernadette White <bwhite@lawaters.ie>
Cc: Info <info@lawaters.ie>
Subject: FW: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Ms. White,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm. If so, can please get back to me at your earliest convenience.

Thank you,
Rob

Robert Kennedy
Environmental Scientist

MKO
9C Beckett Way, Park West
Business Park, Dublin, D12 XN9W



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From: Robert Kennedy
Sent: Monday, September 4, 2023 12:57 PM
To: bwhite@lawwaters.ie; info@lawwaters.ie
Cc: Órla Murphy <omurphy@mkoireland.ie>
Subject: 220404 Sceirde Rocks Offshore Wind Farm - Scoping

Ms White,

On behalf of Fuinneamh Sceirde Teoranta, MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed Sceirde Rocks Offshore Wind Farm (the Project), a proposed fixed-bottom foundation wind farm that is recognised as a Relevant or Phase One project and located between 5 km and 11.5 km off the coast of Connemara, Co. Galway. From the results of assessments undertaken to date, it is projected that the subject site will be capable of generating up to 450 MW from up to 30 turbines.

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Kind regards,

Robert Kennedy
Environmental Scientist

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