codling wind park

Planning Report Addendum

codling wind park

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Abbreviations

Abbreviation	Term in Full
ACP	An Coimisiún Pleanála
BSAP	Biodiversity Sectoral Adaptation Plan
CAP	Climate Action Plan
CWP	Codling Wind Park
CWPL	Codling Wind Park Limited
DCEE	Department of Climate, Energy and the Environment
DECC	Department of the Environment, Climate and Communications
DHLGH	Department of Housing, Local Government and Heritage
DLRCC	Dún Laoghaire–Rathdown County Council
DMAP	Designated Maritime Area Plan
DPC	Dublin Port Company
EIAR	Environmental Impact Assessment Report
EPA	Environmental Protection Agency
FIR	Further Information Request
GES	Good Environmental Status
GHG	Greenhouse Gas
IAC	Inter Array Cable
IPPEMP	In Principle Project Environmental Monitoring Plan
LPF	Local Planning Framework
MAC	Maritime Area Consent
MARA	Maritime Area Regulatory Authority
MAP	Maritime Area Planning
MPA	Marine Protected Area
MSFD	Marine Strategy Framework Directive
MPPS	Marine Planning Policy Statement
MUL	Maritime Usage Licence
NMPF	National Marine Planning Framework
NIS	Natura Impact Statement
NMPF	National Marine Planning Framework
NPO	National Planning Policy Objective
NPWS	National Parks and Wildlife Services

NRP	Nature Restoration Plan
OfTI	Offshore Transmission Infrastructure
OMPP	Overarching Marine Planning Policy
ORE	Offshore Renewable Energy
OWDT	Offshore Wind Delivery Taskforce
OWF	Offshore wind farm
O&M	Operations and maintenance
OSS	Offshore substation structure
OTI	Onshore Transmission Infrastructure
PDA	Planning and Development Act
RED	Renewable Energy Directive
SI	Site Investigation
SLVIA	Seascape and Landscape Visual Impact Assessment
SMPP	Sectoral Marine Planning Policy
SPAR	Southern Port Access Road
WTG	Wind turbine generator

1 INTRODUCTION

1.1 The CWP Project

1. Codling Wind Park Limited (CWPL) (hereafter 'the Applicant') is proposing to develop the Codling Wind Park (CWP) Project, which is located in the Irish sea approximately 13–22 km off the east coast of Ireland, at County Wicklow.

2. The Applicant is applying for permission for all components of the CWP Project under Section 291 of the Planning and Development Act 2000 (as amended) (PDA) (as inserted by the Maritime Area Planning (MAP) Act 2021). This includes:

   - The generating station, which comprises the wind turbine generators (WTGs), inter array cables (IACs) and interconnector cables;
   - The offshore transmission infrastructure (OfTI), which comprises the offshore substation structures (OSSs) and offshore export cables;
   - The landfall which describes the point at which the offshore export cables are brought onshore; and
   - The onshore transmission infrastructure (OTI) which comprises the onshore export cables, the onshore substation and network cables to a planned extension to the existing ESB Networks 220 kV substation.

3. A detailed description of the CWP Project is provided **Volume 2**, **Chapter 4 Project Description** in the Environmental Impact Assessment Report (EIAR), as amended by **Section 4** of the **EIAR Addendum (Part 1)**.

1.2 Scope and purpose of the report

4. MacCabe Durney Barnes has prepared this **Planning Report Addendum** in response to the Applicant's further information request (FIR) from An Coimisiún Pleanála (the Commission) on 1st August 2025.

5. This **Planning Report Addendum** provides an update in relation to marine and land use planning issues, particularly in relation to policy, since the submission of the CWP Project planning application in September 2024.

6. This **Planning Report Addendum** should be read in conjunction with the **Planning Report** and **Planning Report Appendices** documents that were submitted with the CWP Project planning application. The overarching aim of this document, alongside the **Planning Report** and **Planning Report Appendices**, is to demonstrate compliance with the relevant policy framework.

7. It seeks to avoid repetition and is focussed on compliance with the new policy documents that were adopted since the CWP Project planning application was lodged and is structured as follows:

   - **Section 1 Introduction**
   - **Section 2 The Proposed Development** – briefly describes the proposed development and the minor amendments to the project design that have been made in response to the Commission's FIR.
   - **Section 3 Legislative Changes since September 2024** - gives an overview of relevant legislative changes since the submission of the planning application.
   - **Section 4 Updated Planning Policy Compliance Statement** - particularly regards the national, regional and local policy framework.
   - **Section 5 Planning Appraisal** - considers updates to the EIA, Natura Impact Statement (NIS) and other relevant documents made as a result of the FIR

- **Section 6** – **Conclusion** reiterates the reasons for which the development should be granted permission.

8. This document is supported by several other documents that form part of the overall FIR response. This is illustrated by Table 1 below which shows the full set of documents that make up the Applicant's FIR response. Throughout this document cross reference is made to information provided in the **FIR Response Document**, the **Observations Response Document**, the **EIAR Addendum**, the **NIS Addendum**, and other supporting documents. And it should be read in conjunction with these documents and those submitted as part of the CWP Project planning application.

9. **Appendix B - Schedule of post application consultations** of the **FIR Response Document** provides details of further consultation that has been carried out with statutory consultees and other stakeholders since the planning application was submitted.

Table 1 FIR response schedule of documents

Document	Appendices
FIR Response Document This document provides a point by point response to each request made in the Commission's FIR. It cross refers to information provided in the documents listed below.	• Appendix A - List of prescribed and transboundary bodies • Appendix B - Schedule of post application consultations • Appendix C - Data validation statements • Appendix D - Letter from IRCG r.e. Safety Justification • Appendix E - Marine Guidance Note 654 Compliance Checklist • Appendix F - Offshore and Intertidal Ornithology Cumulative Migratory Collision Risk Modelling • Appendix G - Utility of Radar • Appendix H - Suitability of DAS for Characterising Manx Shearwater Activity • Appendix I - Alternative Outputs Referencing NatureScot Higher Displacement and Mortality Rates • Appendix J - Site-specific Flight Height Distribution Data for Collision Risk Modelling • Appendix K - Project-Only PVA Requirement Review • Appendix L - Potential Appendix for alternative outputs for TTS • Appendix M - NMS approval of draft Marine Archaeology Management Plan (MAMP) • Appendix N - Letter from AirNav Ireland r.e. Dublin Airport • Appendix O - SLVIA additional maps • Appendix P - Temporary bailey bridge drawings
Observations Response Document This document provides a point by point response to observations received on the Applicant's planning application.	• Appendix A – Schedule of Transboundary Consultations

Document	Appendices
EIAR Addendum This document provides new or revised information to support and / or update the planning application EIAR and Non Technical Summary (NTS). Part 1 - Non-Technical Summary and Chapters 1 to 13 of the EIAR. Part 2 - Chapters 14 to 34 of the EIAR.	• Appendix 4-A Updated preliminary offshore export cable crossing schedule • Appendix 6-A Modelling Report Addendum • Appendix 6-B Intertidal Assessment • Appendix 7-A Water Framework Directive Assessment Addendum • Appendix 8-A Benthic Subtidal Survey Report 2025 • Appendix 8-B Landfall and Intertidal Survey Report 2025 • Appendix 8-C DDV Wicklow Reef Survey Report 2025 • Appendix 9-A CWP Migratory Fish eDNA Survey Report 2025 • Appendix 9-B Noise overlap with spawning and nursery ground calculations • Appendix 9-C Underwater Noise Modelling Assessment • Appendix 10-A Tern and Black Guillemot Survey Report 2025 • Appendix 10-B Migration Survey Report • Appendix 10-C ESAS Survey Report 2025 • Appendix 10-D Baseline and contemporary data comparison • Appendix 10-E Intertidal Crepuscular Tern Survey Report 2025 • Appendix 10-F Intertidal Waterbirds Survey Report 2025 • Appendix 10-G Regional Population Assessment • Appendix 10-H Kittiwake Displacement Matrices • Appendix 10-I Design-based Density, Abundance Estimates and Distributional Response of the Red-throated Diver • Appendix 10-J Parameterisation of Red-throated Diver Displacement Rates • Appendix 10-K Roseate Tern Collision Risk Modelling • Appendix 10-L Great Black-backed Gull Population Viability Analysis Parameter Log • Appendix 11-A Update to Marine Mammal Baseline Characterisation • Appendix 11-B SMRU Consulting TTS Position Statement • Appendix 11-C Assessment of disturbance from mitigated pile driving – Full results

Document	Appendices
	• Appendix 12-A Evidence of fishing within OWF array areas • Appendix 13-A Offshore Bat Survey Report 2025 • Appendix 13-B LUX Assessment Report • Appendix 16-A IRCG Safety Justification • Appendix 16-B Navigational Risk Assessment Addendum • Appendix 21-A Badger and Otter Survey Report 2025 • Appendix 21-B Bat Assessment 2025
NIS Addendum This document provides new or revised information to support and/ or update the planning application NIS. It is split into three parts; Part 1 – Introduction, Screening and SAC/ SPA Project Alone Assessment. Part 2 – SAC In-combination Assessment Part 3 – SPA In-combination Assessment	• Appendix A - SPAs Site Specific Conservation Objectives • Appendix B - SACs Site Specific Conservation Objectives
Cumulative Effects Assessment (CEA) Report This document provides updated cumulative assessments for each of the EIA topics. It is split into three parts; Part 1 – Introduction and Methodology Part 2 – Offshore Topics (Chapters 6 to 18 of the EIAR) Part 3 – Onshore and Project-wide Topics (Chapters 19 to 32 of the EIAR)	Part 1: • Appendix 1 - Long list of other development Part 2: • Appendix 1 - Ornithology Quantitative Tables
Other Documents • Fisheries Management and Mitigation Strategy (FMMS) • Marine Mammal Mitigation Protocol (MMMP) • Ecological Vessel Management Plan (EVMP)	• Planning Report Addendum: Appendix 1 - NMPF Compliance / MSFD Assessment • There are no FIR appendices associated with the other stand-alone documents

Document	Appendices
• In Principle Project Environmental Monitoring Plan (IPPEMP) • Construction Environmental Management Plan (CEMP) • Construction & Demolition Waste Management Plan (CDWMP) • Marine Archaeology Management Plan (MAMP) • Planning Report Addendum • Regulation 54 Derogation Application	
Planning Drawings Planning drawings updated in response to the FIR.	• 0063 Export cable Burial and Protection details Revision B

1.3 Need for Development

10. Since the CWP application was submitted in September 2024, the geopolitical landscape has degraded with increased threats to Ireland's stable and affordable supply of energy. There has been no abatement in the Russian – Ukrainian conflict. Since, there have been threats against the national sovereignty of European Member States and the Iranian conflict, bringing to the fore the increasing challenges in accessing fossil fuels. Energy security has been increasingly challenged and threatened, demonstrating the urgent need for a domestic supply.

11. In parallel, the effects of climate change are ever present and their impacts ever more damaging. Ireland and particularly the Dublin Region suffered in the first quarter of 2026 from continuous heavy rainfall leading to flood events around the region and across the country.

12. The urgency and crucial need for projects like CWP is ever more pressing and obvious to allow for a speedy transition toward a domestic green supply of energy, while limiting GHG emissions. The SEAI's First Look: Ireland's Energy Supply and Security of Supply in 2024[1] shows that in 2024, Ireland's total primary energy requirement was 167.5 TWh. Of this 48.9% came from oil and a further 29.7% came from natural gas. Renewable energy provided for 14.5% of the requirement. In parallel, the national overall energy requirement increased by 3.82 TWh. Ireland's net imports included +1.79 TWh of interconnector electricity, +1.44 TWh of natural gas and +1.28TWh of renewable energy. With 81.4% of energy needs satisfied by fossil fuels, the country is heavily reliant on these to meet its own energy needs.

13. The report further considers the country's dependency on a foreign supply. It uses a calculation referred to as 'energy import dependency' which is defined as the ratio of net imports (i.e. imports less exports) to primary energy supply (including non-energy sub-products), plus international marine bunkers. In 2024, Ireland's overall energy dependency in 2024 was 79.7%, up 1.4 percentage points on the value of 78.3% for 2023. The average EU energy import was 58.3% in 2023. Further data from Eurostat shows that in 2024, Ireland was the 4th highest importer of fossil fuel in the Union[2]. These

[1] SEAI, 2025,First Look: Ireland's Energy Supply and Security of Supply 2024, August 2025
[2] Eurostat, 2026, Energy in Europe: imports dependence, 18 March 2026

figures showcase the existential need for projects such as CWP in supporting a domestic energy supply, Ireland being particularly exposed to any market shocks and geopolitical crises.

2 THE PROPOSED DEVELOPMENT

14. This section provides an overview of the proposed development and the minor amendments that were made on foot of the FIR issued by the Commission in August 2025.

2.1 Description of Development as per the Public Notices

15. The public notices described the development as follows:

The construction, operation and decommissioning of the Codling Wind Park (CWP) Project, an offshore wind farm (OWF), consisting of a generating station with wind turbine generators (WTGs) located in the maritime area, in the Irish Sea approximately 13-22 km off the County Wicklow coast. Offshore transmission infrastructure will connect the generating station to the shore. This includes the offshore export cables which will cross the nearshore area of Wicklow County Council, Dún Laoghaire Rathdown County Council and Dublin City Council, arriving at the landfall location on the southern shoreline of the Poolbeg Peninsula, Ringsend, Dublin 4. Onshore transmission infrastructure will be installed on the Poolbeg Peninsula. The onshore transmission infrastructure will include onshore export cables routed underground from the landfall to a new onshore substation located to the north of Pigeon House Road, Dublin 4, and an onward connection to the existing Poolbeg 220 kV electrical substation at Pigeon House Road, Ringsend, Dublin 4.

The generating station will consist of one of two different WTG layout options:

- *WTG Layout Option A, consisting of 75 WTGs with a rotor diameter of 250 m and blade tip height of 287.72 m above Lowest Astronomical Tide on monopile foundations; or*
- *WTG Layout Option B, consisting of 60 WTGs with a rotor diameter of 276 m and blade tip height of 313.72 m above Lowest Astronomical Tide on monopile foundations.*

CWPL is seeking development permission for both WTG layout options, but will construct, operate and decommission only one or the other of the WTG layout options (and not both or a combination of both). The generating station will include a network of inter-array cables (IACs) that distribute the electrical power generated at the WTGs to the offshore substation structures (OSSs), which form part of the offshore transmission infrastructure, and two interconnector cables connecting the OSSs to each other. Scour protection around the base of the monopile foundations and cable protection on the IACs and interconnector cables is also proposed.

The offshore transmission infrastructure will consist of three OSSs each comprising an OSS topside fixed on a single monopile foundation to which the IACs and interconnector cables will connect, and three 220 kV offshore export cables, connecting the OSSs to the landfall. Scour protection around the base of the OSS monopile foundations and cable protection on the offshore export cables is also proposed.

The landfall is the onshore/ offshore interface of the project and extends across the intertidal area in the South Dublin Bay and to three underground transition joint bays (TJBs) on the southern shoreline of the Poolbeg Peninsula. Offshore export cables will be installed in ducted and non-ducted sections in this area before connecting to the onshore export cables within the TJBs.

The onshore transmission infrastructure consists of the TJBs, three 220 kV onshore export cables between the TJBs and the onshore substation in an underground tunnel, which will be approximately 0.7 km long, with an outer diameter of 3.6 m.

The onshore substation will have an operational site area of 16,050 sqm and will include:

- *excavation of land in the north-eastern part of the site to a depth of -0.51 m ordnance datum (OD);*

- *reclamation of land (1,800 sqm) in the southeastern part of the site for the Electricity Supply Board (ESB) building;*
- *a main gas insulated switchgear (GIS) building, dimensions are 61.86 m (length) x 19.79 m (width) x 35.20 +mOD (height), including three shunt reactors;*
- *an ESB GIS building, dimensions are 35.09 m (length) x 15.06 m (width) x 23.10 +mOD (height);*
- *an ESB Medium Voltage (MV) building, dimensions are 10.14 m (length) x 5.64 m (width) x 8.07 +mOD (height);*
- *a Statcom building, dimensions are 93.14 m (length) x 26.76 m (width) x 29.50 +mOD (height);*
- *three harmonic filters;*
- *upgrades to the existing access road from Pigeon House to the main site entrance;*
- *a new bridge to provide vehicle access across the cooling water discharge channel;*
- *new internal access road layout within the site boundary including 9 no. car parking spaces;*
- *perimeter structures include upgraded revetments and quay retaining walls;*
- *drainage infrastructure;*
- *security fencing and lighting; and*
- *landscaping and associated site works.*

In addition to the above, the onshore transmission infrastructure will include three 220 kV ESB Networks (ESBN) cables to connect the onshore substation to the Poolbeg 220 kV substation to allow for connection to the national grid. These cables will be laid under the Pigeon House Road.

A ten year planning permission is sought, with an operational lifetime of 25 years. The 25 year operational lifetime shall commence on full commercial operation of the project.

The development may have significant effects on the environment of the United Kingdom and Isle of Man, state party to the UNECE Convention on Environmental Impact Assessment in a Transboundary Context. The Environmental Impact Assessment Report (EIAR) has not identified any significant transboundary effects. The application relates to a development which comprises an activity requiring a Dumping at Sea licence.

The application relates to a development that is partly within a Strategic Development Zone.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the application.

16. Given the modest amendments to the design of the scheme, the description has not been amended.

2.2 Proposed amendments

17. On foot of the review of the FIR issued by the Commission in August 2025 and of the detailed review of the submissions made on the planning application, one design amendment was made to the proposed development. The proposed depth of cable burial near Dún Laoghaire Harbour was amended from a trench depth of 3.0 m to a minimum depth of cover of 3.0 m. The amendment can be viewed on drawing **0063 – Export Cable Burial Protection Details** which accompanies this submission.

18. There are no other amendments to the design of the scheme.

19. Other amendments, further information and clarifications relate to the information contained in the planning application, in the documents listed under **Table 1** of section of this report.

2.3 Planning History and Other Relevant Developments

2.3.1 The Application Site

20. The planning application for the CWP Project was lodged on the 6th September 2024 (**ABP.Ref.320768**). The FIR was issued by the Commission on the 1st August 2025.

21. **MUL230034:** Since the application was submitted the Applicant have received a Maritime Usage Licence (MUL) from the Maritime Area Regulatory Authority (MARA) for the undertaking of survey mobilisation to inform the detailed design of the proposed CWP Offshore Wind Farm (OWF), export cable route, potential operations and maintenance base, potential land reclamation area at the site of the potential onshore substation and additional buffer zone. The MUL was determined on the 23rd February 2026.

2.3.2 Applications by Parties other than the Applicant with a Spatial Overlap with the Application Site

22. **MUL240026:** On the 28th November 2024, Uisce Éireann applied to MARA for a MUL to conduct a strategic modelling study of water currents and bathymetry along the Southeast Coast of Ireland. The study would take place in 11 locations around Ireland, one of which overlaps with the footprint of CWP (Area K).

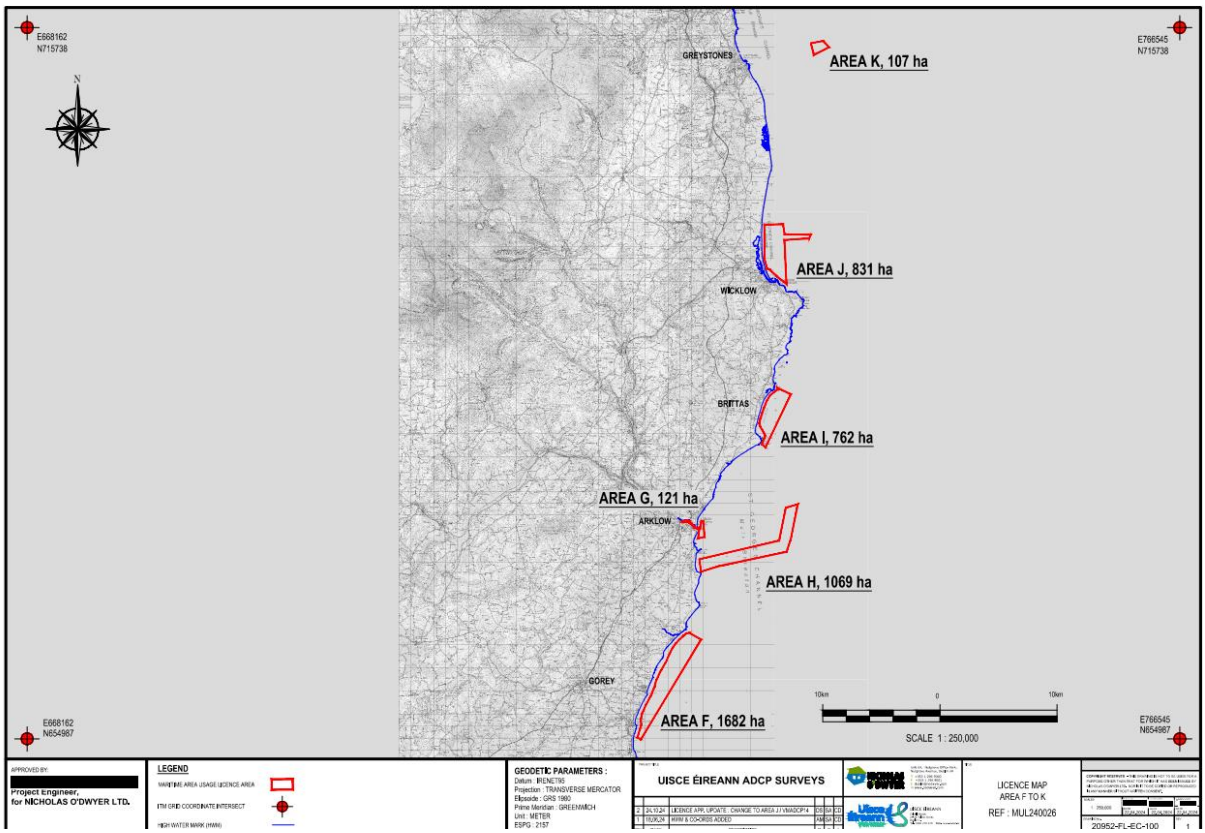


Figure 1: Extract of Proposed Licence Area Map (Source: Nicholas O'Dwyer for Uisce Éireann, as displayed on MARA's website)

23. The MUL was granted on the 8th April

24. **MUL240010**: On the 7th November 2024, Eirgrid applied to MARA for a MUL for site investigation (SI) works to inform the engineering design and environmental assessments of a proposed electrical cable circuit crossing Dublin Bay from Blackrock Park to Shellybank. To date, no decision was made. The findings of the SI would inform the environmental assessment, detailed design and statutory application for a 200 kV circuit that is required to reinforce the transmission network as part of EirGrid's Powering Up Dublin programme of work. A map of the area proposed for licensing is presented below.

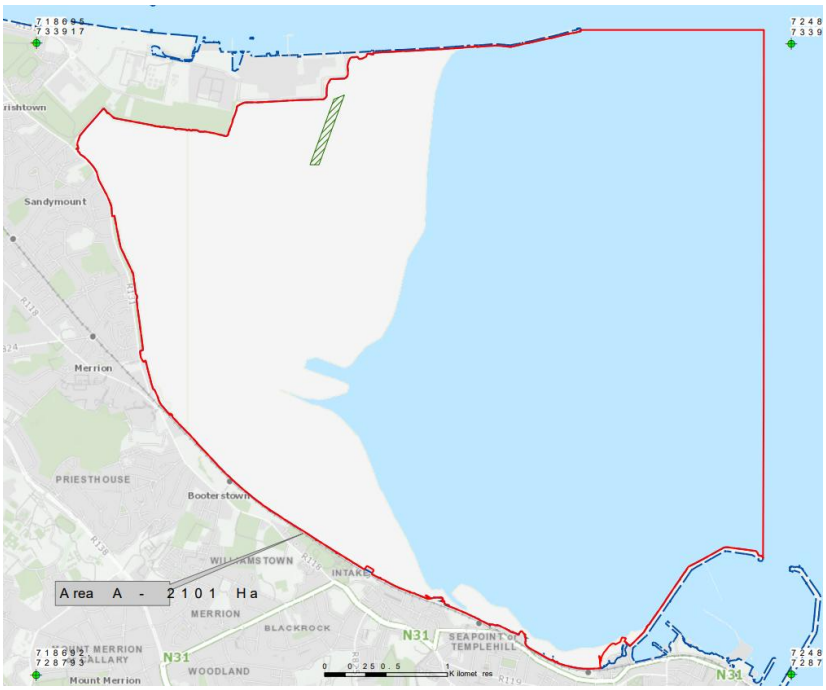


Figure 2: Extract of Proposed Licence Area Map (Source: RPS for EirGrid, as displayed on MARA's website)

2.3.3 Other Relevant Developments

Phase One East Coast Projects

25. All five East Coast OWFs were submitted to the Commission between May 2024 and February 2025. Sceirde Rocks on the West Coast was formally withdrawn. References and status of the outstanding projects are presented below.

Table 2: Status of the East Coast Phase 1 Projects

Project Name	Planning Reference	Planning Application Submission Date	Status
Oriel	ABP.Ref.319799	24/05/24	FIR by ACP on 10/04/25 Response submitted by Applicant on 14/01/26
Arklow Bank Wind Park 2	ABP.Ref.319864	06/06/24	FIR by ACP on 10/04/25

Project Name	Planning Reference	Planning Application Submission Date	Status
			Response submitted by Applicant on 09/04/26
North Irish Sea Array	ABP.Ref.319866	07/06/24	FIR by ACP on 10/04/25 Extension of time to respond by 14/08/26
Dublin Array	ABP.Ref.321992	28/02/2025	FIR by ACP on 08/12/25

26. In general, the FIR for the four projects regarded matters pertaining to[3]:

- General matters;
- Search and rescue
- Compliance with the National Marine Planning Framework (NMPF)
- Ecosystems functions and services assessment
- Cumulative impact
- Alternatives and site selection
- Marine processes
- Ornithology
- Benthic subtidal and intertidal ecology
- Marine mammals and megafauna
- Fish & shellfish ecology
- Commercial fisheries
- Seascape, landscape and visual amenity
- Archaeology (marine and onshore)
- Bats
- Shipping and navigation
- Aviation, military and communication
- Transboundary consultation
- Roads and traffic
- Onshore biodiversity
- Site selection
- Material assets, including traffic
- Socio-economic, tourism, recreation and land use
- Climate

27. Where appropriate or directed by the Commission the Applicant has had due regard to aspects considered by the other projects, including the FIR issued for the other Phase 1 projects.

Onshore

28. **Dublin Port 3FM (ABP.Ref.320250):** The project, which consists of the Southern Port Access Route (SPAR) and road network improvement, the construction of a Lo-Lo container terminal, Ro-Ro freight terminal and other works, has a small element of spatial overlap with the CWP project. submitted on

[3] This list should not be construed as being applicable to all projects

the 23rd July 2024, it was subject of a FIR by the Commission on the 1st May 2025. Dublin Port Company submitted its response on the 2nd October 2025. In summary, the FIR regarded the following aspects:

- Roads safety, access, management of the SPAR, car parking
- Sequencing programme
- Community infrastructure
- Acoustic fencing
- Construction and operational lighting
- Trees
- Contents of the application documentation.

Where appropriate or directed by the Commission, the Applicant has had due regard to aspects considered under the Dublin Port 3FM project.

29. No other onshore development of relevance has been identified.

3 LEGISLATIVE CHANGES SINCE SEPTEMBER 2024

3.1 Introduction

30. This section provides an overview of the key legislative changes that occurred since the application was lodged in September 2024.

3.2 European Legislation

3.2.1 Nature Restoration Regulation

31. Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869) ('The Nature Restoration Regulation') lays down '*rules to contribute to the long-term and sustained recovery of biodiverse and resilient ecosystems across the Member States' land and sea areas through the restoration of degraded ecosystems; achieving the Union's overarching objectives concerning climate change mitigation, climate change adaptation and land degradation neutrality, enhancing food security; meeting the Union's international commitments'*.

32. It sets out targets ('restoration measures') for the restoration of marine ecosystems under article 5. Under article 16, Member States shall submit a draft of the national restoration plan that is to be prepared in accordance with articles 14 and 15 to the Commission by the 1st September 2026.

33. Minister for Nature, Heritage and Electoral Reform, Malcom Noonan TD announced[4] on the 22nd October 2024 the establishment of an independent Advisory Committee on Nature Restoration to support the development of Ireland's Nature Restoration Plan (NRP).

3.3 Irish Legislation

3.3.1 European Union (Planning and Development) (Renewable Energy) Regulations 2025

34. The 2023 EU Renewable Energy Directive (RED) III was transposed into Irish legislation through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 247 of 2025), which were published on the 6th August 2025. The regulations amend both the Planning and Development Act 2000 ('the Act'), as amended and the Planning and Development Regulations 2001, as amended ('the Regulations').

35. The provisions of the regulations apply to projects for which 'an application or request' was made after the 1st October 2025 and therefore do not apply to CWP.

3.3.2 Climate Action and Low Carbon Development Act 2015

36. Although not amended or new legislation, the Applicant would like to note the outcomes of the Coolglass v An Coimisiún Pleanála [2026] IESC 27 which particularly considers the obligations on

[4] Minister Noonan announces next step in the development of Ireland's Nature Restoration Plan

public bodies to act consistently with the Climate Action and Low Carbon Development Act 2015 as amended by the 2021 Act.

37. In the Supreme Court judgement, the court found that if an Applicant has raised section 15(1) of the Act in support of an application, then the competent authority must address it in its decision as to why a development is consistent as far as practicable with the climate objective set out in the act.

38. The Applicant has extensively set out in the planning application, including the **Planning Report**, why CWP was consistent with the climate objective and therefore why the Commission should give consent for the development to proceed.

4 UPDATED PLANNING POLICY COMPLIANCE STATEMENT

4.1 Introduction

39. This section provides an overview of the key policy changes that occurred since the application was lodged in September 2024 and sets out how the project complies.

4.2 European Policy

4.2.1 Joint Offshore Wind Investment Pact for the North Seas

40. At the North Sea Summit 2026, the Irish Government, along with other European governments, Norway and the United Kingdom cemented their commitment to advance Europe's energy security, competitiveness and decarbonisation ambitions. With the pact, the governments committed to scaling offshore wind energy to the levels required for Europe's decarbonisation, to ensure affordable and secure energy for citizens and businesses and to strengthen Europe's industrial base and technological leadership. In particular, the pact aims to:

- Reach 300 GW offshore wind energy capacity by 2050 in the North Seas, with the participating governments contributing to 100 GW through cooperation projects, implying 200 GW are to be delivered by the countries themselves.
- Promote collaboration on solutions to further de-risk investments and mobilise private capital.
- Ensure reliable and resilient supply chains.

41. CWP will be an important contributor to an affordable and secure of domestic energy. It will kickstart the Irish supply chain by being one of the first large-scale offshore energy projects, supporting the creation of new jobs.

4.3 National Policy

42. This section provides an update on the evolution of the national policy framework for both marine and terrestrial planning since the application was submitted to the Commission and provides a statement of compliance so as to ensure the Commission has the most up-to-date information.

4.3.1 Draft Marine Planning Policy Statement

43. The draft Marine Planning Policy Statement (MPPS) was available for public consultation in the summer of 2025. The statement sets out the principles of marine planning. Of particular relevance to CWP are:

- The alignment with terrestrial planning ensuring that land-sea interactions are provided for;
- The application of an ecosystem-based approach;
- The protection and restoration of biodiversity;
- The compatibility of the collective pressure of activities with the achievement and maintenance of the Good Environmental Status (GES)
- The effective use of the maritime area through the identification of opportunities for co-location and co-existence where feasible
- The promotion of safety-at-sea;

- The assurance that all activities and development are regulated within a robust governance structure, which will oversee compliance with conditions for authorisations and licences.

44. Although not formally adopted, the draft MPPS may be in place at the time a decision is made on the CWP application. CWP has fully accounted for land-sea interactions, particularly seascape and landscape, which has been addressed through **EIAR Chapter 15 – Seascape, Landscape and Visual Assessment** submitted with the planning application and was further elaborated upon in response to Item 20 of the FIR. Coastal processes were also fully addressed under **EIAR Chapter 6 – Marine Geology, Sediments and Coastal Processes**.

45. The planning application has demonstrated how it is within the acceptable thresholds of Marine Strategy Framework Directive (MSFD) and therefore does not prejudice the application of an ecosystem-based approach. It has also demonstrated under **EIAR Chapter 3 - Site Selection and Consideration of Alternatives** how the site is the optimum solution from an ecosystem's perspective.

46. Both the **Planning Report Appendix A – Compliance with the National Marine Planning Framework** and the **EIAR** and the **EIAR Addendum** demonstrate how the development has sought to avoid, minimise and / or mitigate impacts on biodiversity and has had due regard to the Biodiversity Overarching Marine Planning Policies (OMPPs) of the NMPF.

47. The planning application, the **EIAR Addendum** and the **Observation Response Document** have all discussed how the project is seeking to ensure the maximum access to the array to fisheries active in the area, insofar as practicable, with a view to promote coexistence.

48. The proposed layout is fully compliant with the requirement to support safety-at-sea. The **FIR Response Document** addresses any outstanding concerns raised under Item 2 – Search and Rescue of the FIR.

49. Importantly, the Applicant is committed to being fully compliant with the conditions that may be attached to consent and have devised an **In Principle Project Environmental Monitoring Plan (IPEMP)** which was updated in response **to Item 1 – General Matters** of the FIR.

4.3.2 National Marine Planning Framework

50. There has been no update or revision to the **National Marine Planning Framework** (NMPF) since September 2025. The statement of compliance with both of these documents can be found in the planning report.

51. Where an issue has been raised in relation to an OMPP or a Sectoral Marine Planning Policy (SMPP) by either the Commission or a third-party submission, a response is provided in the **FIR Response Document** (for issues raised by Commission) or the **Observation Response Document** (for issues raised by a third party).

52. In response to Item 3d of the FIR, the Applicant has reviewed the Statement of Consistency with the NMPF, which had been submitted with the Applicant under **Appendix A** of the **Planning Report**. The Applicant refers the Commission to **Appendix 1 - NMPF Compliance / MSFD Assessment** of this **Planning Report Addendum,** which responds in detail to Items 3a, b and c of the FIR.

53. In relation to **Biodiversity Policy 2**, the Applicant further elaborates as follows:

Table 3 NMPF Biodiversity Policy 2

NMPF Policy	CWP Project Response 2024	Review of Project Consistency with Policy Following with FIR (2026)	
Biodiversity Policy 2 Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats.	As demonstrated by the **EIAR** and/or the **NIS** as appropriate, CWPL has sought to avoid significant reduction in the distribution and extent of important habitats, or their habitats that important species depend upon, through sensitive design and appropriate mitigation. There will be no adverse impact, and significant loss of habitats, has been avoided and / or mitigated. Application Documentation Reference **Chapter 8 Subtidal and Intertidal Ecology** **Chapter 9 Fish, Shellfish and Turtle Ecology** **Natura Impact Statement**	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2). As noted in **Appendix 1**, the development will not exceed any of the four thresholds and therefore will not impede the achievement of the GES. The estimated reduction in habitat (D6C4) and the area of habitat effected (D6C5) are neither in excess of the MSFD thresholds nor constitutes a significant reduction as envisaged under the NMPF. Similar conclusions are drawn for impulsive noise (D11C1) and continuous noise (D11C2), which are not in excess of the thresholds. **Appendix 1** therefore confirms that the statement made by the Applicant in 2024 still applies. There will no significant adverse impact and significant loss has been avoided and / or mitigated. The development complies	

		with Biodiversity Policy 2 of the NMPF.	

54. In relation to Seafloor Integrity Policies 1, 2 and 3, the Applicant elaborates as follows:

Table 4 NMPF Seaffloor Integrity Policies 1, 2 and 3

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Sea-floor and Water Column Integrity Policy 1 Proposals that incorporate measures to support the resilience of marine habitats will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority and where they contribute to the policies and objectives of this NMPF. Proposals which may have significant adverse impacts on marine, particularly deep sea, habitats must demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate significant adverse impacts on marine habitats, or d) if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding.	The water depth across the CWP Project does not place it in the deep sea category. CWPL, in accordance with Sea-floor and Water Column Integrity Policies 1-3, through sensitive design and appropriate mitigation have sought to avoid, minimise or mitigate significant adverse effects on marine and coastal habitats and species as set out in **Section 8.9 Primary Mitigation Measures** of **Chapter 8 Subtidal and Intertidal Ecology** and assessed in **Section 10.8**. The assessment concludes no adverse effects. Application Documentation Reference **Chapter 8 Subtidal and Intertidal Ecology** As can be seen in **Chapter 6 Marine Geology, Sediments and Coastal Processes, Section 6.6. Existing Environment** identified the prevailing regimes and receptors which comprise marine geology, sediments and coastal processes. The potential impacts to these receptors have been assessed in **Section 6.10 Impact Assessment**. Through appropriate design and mitigation (described in **Section 6.8**), CWP have sought to avoid significant adverse effects on marine geology, sediments and coastal processes and thus avoid, minimise, or mitigate against significant adverse impacts on marine habitats. The EIA concludes that no significant adverse effects are anticipated on	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for habitat loss (D6C4) and adverse effects on habitats (D6C5). As noted in **Appendix 1** above, the development will not exceed these two thresholds and therefore will not impede the achievement of the GES. The estimated reduction in habitat (D6C4) and the area of habitat effected (D6C5) are not in excess of the MSFD thresholds. The EIAR has not identified residual adverse effects on foot of application of mitigation measures. **Appendix 1** therefore confirms that the statement made by the Applicant in 2024 still applies. There will no significant adverse impact and significant loss has been avoided and / or mitigated. The development complies with Sea-floor and Water Column Integrity Policy 1 of the NMPF.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	marine geology, sediments and coastal processes receptors and consequently no adverse impacts on the physical processes which drive the function of marine habitats are anticipated, thereby adhering to Sea-floor and Water Column Integrity Policy 1 described in the NMPF. Application Documentation Reference **Chapter 6 Marine Geology, Sediments and Coastal Processes**	
Sea-floor and Water Column Integrity Policy 2 Proposals, including those that increase access to the maritime area, must demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate adverse impacts on important habitats and species.	As above in relation to Sea-floor and Water Column Integrity Policy 1. Application Documentation Reference **Chapter 6 Marine Geology, Sediments and Coastal Processes** **Chapter 8 Subtidal and Intertidal Ecology** Important habitats are considered in **Section 9.6 Existing Environment** of **Chapter 9 Fish, Shellfish and Turtle Ecology** and potential impacts to these receptors have been assessed in **Section 9.10 Impact Assessment.** Application Documentation Reference **Chapter 9 Fish, Shellfish and Turtle Ecology**	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for habitat loss (D6C4) and adverse effects on habitats (D6C5). As noted in **Appendix 1** above, the development will not exceed these two thresholds and therefore will not impede the achievement of the GES. The estimated reduction in habitat (D6C4) and the area of habitat effected (D6C5) are not in excess of the MSFD thresholds. The EIAR has not identified residual adverse effects on foot of application of mitigation measures. The development complies with Sea-floor and Water Column Integrity Policy 2 of the NMPF.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Sea-floor and Water Column Integrity Policy 3 Proposals that protect, maintain, restore and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must take account of the space required for coastal habitats, for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise , or c) mitigate for net loss of coastal habitat.	As above in relation to Sea-floor and Water Column Integrity Policy 1. Application Documentation Reference **Chapter 6 Marine Geology, Sediments and Coastal Processes** **Chapter 8 Subtidal and Intertidal Ecology**	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for habitat loss (D6C4) and adverse effects on habitats (D6C5). As noted in **Appendix 1** above, the development will not exceed these two thresholds and therefore will not impede the achievement of the GES. The estimated reduction in habitat (D6C4) and the area of habitat effected (D6C5) are not in excess of the MSFD thresholds. The EIAR has not identified residual adverse effects on foot of application of mitigation measures. **Appendix 1** therefore confirms that the statement made by the Applicant in 2024 still applies. There will no significant adverse impact and significant loss has been avoided and / or mitigated. The development complies with Sea-floor and Water Column Integrity Policy 3 of the NMPF.

55. In relation to Fisheries Policy 5, the Applicant elaborates as follows:

Table 5 NMPF Fisheries Policy 5

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Fisheries Policy 5 Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. If proposals	Impacts associated with fish habitat are assessed in EIAR Volume 3, **Chapter 9 Fish, Shellfish and Turtle Ecology**. Whilst no significant impacts have been identified, the CWP Project are undertaking feasibility studies	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for habitat

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
cannot enhance essential fish habitat, they must demonstrate that they will, in order of preference: a) avoid, b) minimise, c) mitigate significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes. d) If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.	for nature inclusive design (Fisheries Policy 3 to enhance fish habitat) within the voluntary biodiversity strategy for the project (this does not form part of the planning application). Application Documentation Reference **Chapter 9 Fish, Shellfish and Turtle Ecology**	loss (D6C4) and adverse effects on habitats (D6C5). As noted in **Appendix 1** above, the development will not exceed these two thresholds and therefore will not impede the achievement of the GES. The estimated reduction in habitat (D6C4) and the area of habitat effected (D6C5) are not in excess of the MSFD thresholds. The EIAR has not identified residual adverse effects on foot of application of mitigation measures. **Appendix 1** therefore confirms that the statement made by the Applicant in 2024 still applies. There will no significant adverse impact on essential fish habitat and significant loss has been avoided and / or mitigated. The development complies with Fisheries Policy 5 of the NMPF.

56. In relation to Underwater Noise Policy 1, the Applicant elaborates as follows:

Table 6 NMPF Noise Policy 1

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Underwater Noise Policy 1 Proposals must take account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna. Where the potential for significant impact on marine fauna from underwater noise is identified, a	Reference is made to **Chapter 9 Fish, Shellfish and Turtle Ecology** and to **Appendix 9.4 Underwater Noise Assessment.** The hearing sensitivities of fish are considered in **Section 9.6 Existing Environment** and potential impacts to these receptors have been assessed in **Section 9.10 Impact Assessment**.	**Appendix 1 - NMPF Compliance / MSFD Assessment** of this report specifically addresses the threshold values set under MSFD, in particular for impulsive noise (D11C1) and continuous noise (D11C2). As noted in **Appendix 1** above, the development will not exceed the two thresholds and therefore will

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)

Noise Assessment Statement must be prepared by the proposer of development. The findings of the Noise Assessment Statement should demonstrably inform determination(s) related to the activity proposed and the carrying out of the activity itself.
 	
The content of the Noise Assessment Statement should be relevant to the particular circumstances and must include:
 	
• Demonstration of compliance with applicable legal requirements, such as necessary assessment of proposals likely to have underwater noise implications, including but not limited to:
  ○ Appropriate Assessment (AA);
  ○ Environmental Impact Assessment (EIA);
  ○ Strategic Environmental Assessment (SEA);
  ○ Specific response to 'strict protection' requirements of Article 12 of the Habitats Directive in relation to certain species listed in Annex IV of the Directive; and
  ○ Species protected under the Wildlife Acts.
 	
• An assessment of the potential impact of the development or use on the affected species in terms of environmental sustainability;
• Demonstration that significant adverse impacts on marine fauna resulting from underwater noise will, in order of preference and in accordance with legal requirements be:
	This document therefore represents the Noise Assessment Statement for the purposes of fish, shellfish, and turtles, and should be read in conjunction with **Chapter 11 Marine Mammals**.
	
	Adverse impact to noise sensitive receptors has been avoided and / or mitigated.
	
	Application Documentation Reference
	
	Chapter 9 Fish, Shellfish and Turtle Ecology
	
	Appendix 9.4 Underwater Noise Assessment
	
	Chapter 11 Marine Mammals
	
	In relation to subtidal and intertidal ecology, reference to **Chapter 8 – Subtidal and Intertidal Ecology** is made. In relation to temporary habitat disturbance, any impacts of noise and vibration would be short term and very localised. Given this, the potential impact of noise and vibration would not adversely impact the subtidal and intertidal habitats within the CWP offshore CWP Project area.
	
	Application Documentation Reference
	
	Chapter 8 Subtidal and Intertidal Ecology
	
	Chapter 11 Marine Mammals
	
	Even without causing significant residual effects, the CWP project will result in disturbance of Annex IV species that requires a Derogation Licence under Regulation 54 of the Birds and Natural Habitats Regulations 2011 (transposing Article 12 of the
		not impede the achievement of the GES.
		
		Whether unmitigated or mitigated, impulsive noise generated by the project will not exceed D11C1 and therefore will not impede the achievement of the GES.
		
		In relation to continuous noise (D11C2), either generated during the operation phase or the construction the development will be considerably lower than the 20% threshold in MSFD and therefore will not impede the achievement of the GES.
		
		Appendix 1 therefore confirms that the statement made by the Applicant in 2024 still applies.
		
		Further details are also provided in **Appendix 9-C Underwater Noise Modelling Assessment** to the **EIAR Addendum**.
		
		There will no significant adverse impacts. The development complies with Underwater Noise Policy 1 of the NMPF.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
a) avoided, b) minimised, or c) mitigated, or d) if it is not possible to mitigate significant adverse impacts on marine fauna, the reasons for proceeding must be set out. This policy should be included as part of statutory environmental assessments where such assessments require consideration of underwater noise.	Habitats Directive.) CWPL will apply for that derogation licence close to the date of submission of the planning application for the CWP Project. In order to comply with the decision of the CJEU in *Hellfire Massey v An Bord Pleanála*, ABP must, before deciding to grant permission for the CWP Project, (a) confirm that NPWS has granted that licence and (b) reflect the granting of the licence in its reasoned conclusion on the EIA and AA. ABP will also need to take account of the NPWS decision in its assessment of the CWPL Project's compliance with Biodiversity Policy 4. CWP proposes that it would write to ABP to confirm if and when NPWS has granted the licence, so that ABP can then take whatever steps it considers necessary to ensure the derogation licence is provided to it for consideration and public consultation if required. Application Documentation Reference **Chapter 11 Marine Mammals**	

57. The Applicant notes that the Commission specifically refer to NMPF Protected Marine Site Policy 1 in their cover letter as follows:

Table 7 NMPF Protected Marine Site Policy 1

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with	The **Natura Impact Statement** submitted in support of the planning application concludes no Adverse Effect on Site Integrity (AESI) on any SPA or SAC from the project on its own or in-	On foot of the Natura Impact Statement Addendum and the **EIAR Chapter 8, Subtidal and intertidal ecology Addendum,** and the **Chapter 9 Fish, Shellfish and Turtle Ecology Addendum**, the

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.	combination with other development. CWPL, in accordance with Biodiversity Policy 1, have sought to avoid, minimise, or mitigate any significant adverse impacts on natural habitat connectivity and in accordance with Biodiversity Policy 2, have avoided significant reduction in the distribution and extent of important habitats, or their habitats that important species depend upon, through sensitive design and appropriate mitigation, as set out in **Section 8.10 Impact Assessment of EIAR Chapter 8, Subtidal and intertidal ecology**. CWPL, in accordance with Protected Marine Sites Policies 1-4 have demonstrated there will be no adverse effects on the integrity of protected sites from the CWP Project as set out in **Section 8.6 Existing Environment, Section 8.9 Primary Mitigation** and **Section 8.10 Impact Assessment**.	Applicant's position has not changed.
	Annex II species are considered in **Section 9.6 Existing Environment** of **Chapter 9 Fish, Shellfish and Turtle Ecology** and potential impacts to these receptors have been assessed in **Section 9.10 Impact Assessment**. Adverse impact to Special Areas of Conservation for which fish and shellfish are a relevant consideration, has been avoided and / or mitigated.	

58. The conclusions they provided in **Appendix A - Compliance with the National Marine Planning Framework** still stand on foot of the documentation prepared as part of the **FIR**. However, given the contents on certain points raised in the FIR, it is considered as prudent to elaborate on specific policies.

Table 8 NMPF Environmental – Ocean Health Policy

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Environmental – Ocean Health Policy 1 Compliance with NMPF policies relating to: • Biodiversity • Non-indigenous species • Water quality • Sea-floor and water column integrity • Marine litter • Underwater noise Should include demonstration of contribution to the relevant Marine Strategy Framework Directive (MSFD) targets identified.	The documentation accompanying this application to An Bord Pleanála (ABP) includes an **Ecosystem Services Report** in **Annex A** of this appendix. This report shows clearly the link between MSFD, the OMPP and the EIAR topics. As demonstrated in **Chapter 7 Marine Water Quality** states**,** offshore waters are assessed in line with the MSFD descriptors outlined in the Ireland's Marine Strategy Framework Directive – Article 19 Summary Report Initial Assessment, Good Environmental Status (GES) and Target and Indicators – October 2013 (DHLGH and Marine Institute, 2013) and Article 17 update (DHLGH and Marine Institute, 2020). These descriptors are considered in **Section 7.6 Existing environment** and assessed in **Section 7.10 Impact assessment**. Application Documentation Reference **Annex A– Ecosystem Services Report** **Chapter 7 Marine Water Quality** EIAR chapters as they are listed in response to the NMPF policies	As demonstrated in response to **Item 3** of the **FIR,** the proposed development does not exceed the MSFD thresholds D11C1 and D11C2 or D6C4 and D6C5. Having considered the FIR response, the NIS and EIAR Addenda and the updated documentation, the Applicant is satisfied that the development complies with Environmental - Ocean Health Policy 1.

Table 9 NMPF Biodiversity Policies

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Biodiversity Policy 1: Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity.	As demonstrated by the **EIAR** and/or the **Natura Impact Statement** as appropriate, CWPL has sought to avoid, minimise or mitigate any significant adverse impacts on natural connectivity (**Chapter 8 Subtidal and Intertidal Ecology**), on diadromous fish migratory routes (**Chapter 9 Fish, Shellfish and Turtle Ecology**), on ornithology (**Chapter 10 Ornithology**), on marine mammals (**Chapter 11 Marine Mammals**) and on offshore bats (**Chapter 13 Offshore Bats**). On this basis, the CWP Project complies. Application Documentation Reference **EIAR Chapters:** **Chapter 8 Subtidal and Intertidal Ecology** **Chapter 9 Fish, Shellfish and Turtle Ecology** **Chapter 10 Ornithology** **Chapter 11 Marine Mammals** **Chapter 13 Offshore Bats** **Natura Impact Statement**	As demonstrated in response to **Item 3** of the **FIR,** the proposed development does not exceed the MSFD thresholds D11C1 and D11C2 or D6C4 and D6C5. Having considered the FIR response, the NIS and EIAR Addenda and the updated documentation, the Applicant is satisfied that the development complies with Biodiversity Policy 2.
Biodiversity Policy 3 Where marine or coastal natural capital assets are recognised by Government: • Proposals must seek to enhance marine or coastal natural capital assets where possible. • Proposals must demonstrate that they will in order of	Natural Capital assets are considered in **Section 7.6 Existing Environment** of **Chapter 7 Marine Water Quality** and assessed in Section 7.10 Impact assessment. Significant adverse effects have been avoided (as presented **in Section 7.10**) with any proposed mitigation measures presented in **Section 7.9** and **Section 7.11**.	On review of the FIR response and addenda submitted to the Commission it is considered that the statement made in 2024 in relation to Biodiversity Policy 3 still applies. The proposed development complies with the NMPF policy.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
preference, and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate significant adverse impacts on marine or coastal natural capital assets, or d) if it is not possible to mitigate significant adverse impacts on marine or coastal natural capital assets proposals must set out the reasons for proceeding.	Application Documentation Reference **Chapter 7 Marine Water Quality** Natural capital assets are also considered in Section 9.6 Existing Environment of **Chapter 9 Fish, Shellfish and Turtle Ecology** and potential impacts to these receptors have been assessed in **Section 9.10 Impact Assessment**. Adverse impacts have been avoided and / or mitigated. Application Documentation Reference **Chapter 9 Fish, Shellfish and Turtle Ecology**	
Biodiversity Policy 4 Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate significant disturbance to, or displacement of, highly mobile species	Mobile species are considered in **Section 9.6 Existing Environment** of **Chapter 9 Fish, Shellfish and Turtle Ecology** and potential impacts to these receptors have been assessed in **Section 9.10 Impact Assessment**. Adverse impacts have been avoided and / or mitigated. Application Documentation Reference **Chapter 9 Fish, Shellfish and Turtle Ecology** **Chapter 10 Ornithology** considers impacts in **Section 10.10 Impact Assessment** of the CWP Project on both terrestrial and marine birds, during breeding, non-breeding, and where relevant	In response to **FIR Item 3** the Applicant has reviewed the proposed development's impact on four MSFD thresholds and have found that the development does not breach the threshold or prevent the achievement of the GES. Under **Items 7, 10, 11** and **14** the Applicant has demonstrated that they have mitigated against significant disturbance to or displacement of, highly mobile species as there is no residual significant effects generated by the proposed development. Furthermore, the Applicant wishes to confirm that it is in the process of submitting an application for a Derogation Licence under Regulation 54 of the Birds and Natural Habitats Regulations 2011

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	migration, in relation to the three phases: • **Construction**: Having considered all impacts (disturbance, direct effects on habitat, changes in prey availability, and introduction of invasive non-native species), the CWP Project would not give rise to significant residual effects. • **Operation/Maintenance (O&M)**: Having considered all impacts (disturbance, direct effects on habitat, changes in prey availability, introduction of invasive non-native species, and collision) would not give rise to significant residual effects. • **Decommissioning:** Having considered all impacts (disturbance, direct effects on habitat, changes in prey availability, and introduction of invasive non-native species) would not give rise to significant residual effects. These conclusions are supported by appropriate mitigation which ensures that significant effects can be avoided for terrestrial and marine ornithological receptors during key periods, and adverse effects avoided for designated sites (for which birds are a species of conservation importance) both from the project alone and in combination with other plans and projects. Application Documentation Reference **Chapter 10 Ornithology**	(transposing Article 12 of the Habitats Directive). The 2024 statement of compliance for Biodiversity Policy 4 remains valid.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	Natura Impact Statement	
	Chapter 11 Marine Mammals considers impacts in **Section 11.10 Impact Assessment** of the CWP Project on marine mammals, in relation to the three phases: • **Construction**: Having considered all impacts (auditory injury, disturbance (auditory), vessel disturbance, changes in prey availability, vessel collision), the CWP Project would not give rise to significant residual effects. • **O&M**: Having considered all impacts (disturbance from operational noise, changes in prey availability, vessel disturbance and vessel collision) would not give rise to significant residual effects. • **Decommissioning**: Having considered all impacts (auditory injury, vessel disturbance, changes in prey availability, vessel collision) would not give rise to significant residual effects. These conclusions are supported by appropriate mitigation which ensures that significant effects can be avoided for marine mammals, and adverse effects avoided for designated sites (for which marine mammals are a qualifying interest) both from the project alone and in combination with other plans and projects. Even without causing significant residual effects, the CWP project	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	will result in disturbance of Annex IV species that requires a Derogation Licence under Regulation 54 of the Birds and Natural Habitats Regulations 2011 (transposing Article 12 of the Habitats Directive.) CWPL will apply for that derogation licence close to the date of submission of the planning application for CWP Project. In order to comply with the decision of the CJEU in *Hellfire Massey v An Bord Pleanála*, ABP must, before deciding to grant permission for the CWP Project, (a) confirm that National Parks and Wildlife Service (NPWS) has granted that license and (b) reflect the granting of the licence in its reasoned conclusion on the EIA and Appropriate Assessment (AA). ABP will also need to take account of the NPWS decision in its assessment of the CWP Project's compliance with Biodiversity Policy 4. CWP proposes that it would write to ABP to confirm if and when NPWS has granted the licence, so that ABP can then take whatever steps it considers necessary to ensure the derogation licence is provided to it for consideration and public consultation if required. Application Documentation Reference **Chapter 11 Marine Mammals** **Natura Impact Statement**	

Table 10 NMPF Water Quality Policy

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Water Quality Policy 1 Proposals that may have significant adverse impacts upon water quality, including upon habitats and species beneficial to water quality, must demonstrate that they will, in order of preference and in accordance with legal requirements: a) avoid, b) minimise, or c) mitigate significant adverse impacts.	Water quality existing environment is considered in **Section 7.6** of **Chapter 7 Marine Water Quality** and potential impacts to these receptors are assessed in Section **7.10 Impact Assessment**. Significant adverse effects have been avoided (as presented in **Section 7.10**) with any proposed mitigation measures presented in **Section 7.9** and **Section 7.11**. Application Documentation Reference **Chapter 7 Marine Water Quality CEMP**	As demonstrated in response to **FIR Item 3**, the proposed development does not exceed the threshold for D6C4 and D6C5 and does not prejudice the achievement of the GES. The 2024 statement of compliance for Water Quality Policy 1 remains valid.

Table 11 NMPF Air Quality Policy

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Air Quality Policy 1 Proposals that support a reduction in air pollution should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must demonstrate consideration of their contribution to air pollution, both direct and cumulative.	As stated in **Chapter 28 Climate - Carbon Balance Assessment**, *'GHG emissions have been compared against the carbon budget for the electricity, transport, industry, and waste sectors in 2030 (DECC, 2023), against Ireland's total GHG emissions in 2022 and against Ireland's EU 2030 target of a 30% reduction in non-ETS sector emissions based on 2005 levels (33 Mt CO2eq) (set out in Regulation EU 2018/842 of the European Parliament and of the Council).* *The estimated total construction, O&M, and decommissioning phase GHG emissions (total GHG emissions pre-O&M savings), when annualised over the 25-year*	In response to **FIR Item 17**, the Applicant has revised their Carbon Balance Assessment presented under **Chapter 28 – Climate – Carbon Balance Assessment.** Reference is made to **Climate: Carbon Balance Assessment Addendum,** which provides revised text as follows: *GHG emissions have been compared against the carbon budget for the electricity, transport, industry, and waste sectors in 2030 (DECC, 2023), against Ireland's total GHG emissions in 2022 and against Ireland's EU 2030 target of a 30% reduction in non-ETS sector emissions based*

	CWP Project lifespan (as shown in Table 28-17), are equivalent to 0.03% of Ireland's total GHG emissions in 2022 and 0.05% of Ireland's non-ETS 2030 emissions target. The estimated GHG emissions associated with fuel use during the construction phase are equivalent to 0.01% of the 2030 electricity budget, while the total GHG emissions associated with transport-related activities are 0.2% of the 2030 transport budget, construction waste GHG emissions are 0.001% of the waste budget, and industry-related activities are 0.07% of the 2030 industry budget (DECC, 2023). *The 1300 MW from the array site will generate 5,124,600 MWh of renewable energy annually, assuming a 45% offshore capacity factor (EirGrid, 2020). The most recent (2022) figure for carbon intensity of electricity in Ireland is 332 gCO2eq/kWh (SEAI, 2023). Based on this carbon intensity, the total annual GHG emission savings of the CWP Project will amount to approximately 1,707,367 tonnes of CO2eq, at the 2022 carbon intensity, which is equivalent to 56.7% of the total carbon budget for the electricity sector in 2030 (DECC, 2023) and 5.2% of Ireland's non-ETS 2030 emissions target. When the GHG emissions from the construction, O&M, and decommissioning phases are removed, the annualised (over the 25- year lifespan) emission savings total 1,311,190 tonnes of CO2eq, equivalent to 2% of Ireland's total GHG emissions in 2022, 4% of Ireland's non-ETS 2030 emissions target, and 43.7% of the total carbon budget for the electricity sector in 2030 (Table 2818), i.e., the CWP Project has the potential to reduce Ireland's CO2e emissions by these percentages.'* It is therefore considered that the proposed CWP Project would contribute to a decrease in air	*on 2005 levels (33 Mt CO2eq) (set out in Regulation EU 2018/842 of the European Parliament and of the Council).* *The estimated total construction, O&M, and decommissioning phase GHG emissions (total GHG emissions pre-O&M savings), when annualised over the 25-year CWP Project lifespan (as shown in Table 28-17), are equivalent to 0.03% of Ireland's total GHG emissions in 2022 and 0.05% of Ireland's non-ETS 2030 emissions target. The estimated GHG emissions associated with fuel use during the construction phase are equivalent to 0.01% of the 2030 electricity budget, while the total GHG emissions associated with transport-related activities are 0.2% of the 2030 transport budget, construction waste GHG emissions are 0.001% of the waste budget, and industry-related activities are 0.07% of the 2030 industry budget (DECC, 2023).* *The 1300 MW from the array site will generate 5,124,600 MWh of renewable energy annually, assuming a 45% offshore capacity factor (EirGrid, 2020). The most recent (2022) figure for carbon intensity of electricity in Ireland is 332 gCO2eq/kWh (SEAI, 2023). Based on this carbon intensity, the total annual GHG emission savings of the CWP Project will amount to approximately 1,707,367 tonnes of CO2eq, at the 2022 carbon intensity, which is equivalent to 56.7% of the total carbon budget for the electricity sector in 2030 (DECC, 2023) and 5.2% of Ireland's non-ETS 2030 emissions target. When the GHG emissions from the construction, O&M, and decommissioning phases are removed, the annualised (over the 25- year lifespan) emission savings total 1,275,891 tonnes of CO2eq, equivalent to 2% of Ireland's total*

	pollution as it supports the decarbonisation of the electricity sector as envisaged under the Climate Action Plan (CAP) 2024. Application Documentation Reference **Chapter 28 Climate - Carbon Balance Assessment**	*GHG emissions in 2022, 4% of Ireland's non-ETS 2030 emissions target, and 42.5% of the total carbon budget for the electricity sector in 2030 (Table 2818), i.e., the CWP Project has the potential to reduce Ireland's CO2e emissions by these percentages.'* The results have somewhat changed, but on the whole, the reduction in CWP's contribution is very minor. The proposed development remains one of the largest contributors to the reduction of carbon emissions for the electricity sector. The 2024 statement of compliance with Air Quality Policy 1 remains valid, the development complies.

NMPF Climate Change Policies

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Climate Change Policy 1 Proposals should demonstrate how they: • Avoid contribution to adverse changes to physical features of the coast; • Enhance, restore or recreate habits that provided a flood defence or carbon sequestration ecosystem services where possible. Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements: a) Avoided,	**Section 6.6 Existing Environment of Chapter 6 Marine Geology, Sediments and Coastal Processes** identified the prevailing regimes and receptors which comprise Marine Geology, Sediments and Coastal Processes. The potential impacts to these receptors have been assessed in **Section 6.10 Impact Assessment.** Through appropriate design and mitigation. Adverse impacts on Marine Geology, Sediments and Coastal Processes have been avoided and / or mitigated. Land-sea interactions have been included in this assessment under **Section 6.6 Existing Environment** describes the	On foot of the review of **FIR Item 6 – Marine Geology, Sediments and Coastal Processes**, the Applicant is satisfied that the 2024 statement of compliance for Climate Change Policy 1 still applies.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
b) Minimised; c) Mitigated, d) It not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out. This policy should be included as part of statutory environmental assessment where such assessments are required.	coastal processes. Potential impacts to these receptors have been assessed in **Section 6.10.** The assessment carried out under **Section 6.10** found that generally all construction impacts would give rise to effects in the range of negligible/ minor and minor and do not require additional mitigation. The same conclusion was reached for impacts arising from the operational and decommissioning phases of the project. Reference is also made to **Chapter 8 Subtidal and Intertidal Ecology**, specifically **Section 8.10.** The EIAR has not identified significant effects on any of the receptors. It is therefore concluded that the project will not contribute to adverse changes to physical features of the coast and avoids significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services. Application Documentation Reference **Chapter 6 Marine Geology, Sediments and Coastal Processes**	
Climate Change Policy 2 For the lifetime of the proposal, the following climate change matters must be demonstrated: • estimation of likely generation of greenhouse gas emissions, both direct and indirect;	*Likely GHG emissions direct and indirect:* **Chapter 28 Climate - Carbon Balance Assessment** of the EIAR provides a GHG Emissions Assessment (GHGA). This assessed considered a number of representative scenarios. The	In response to **FIR Item 17**, the Applicant has revised the Carbon Balance Assessment presented under **Chapter 28 – Climate – Carbon Balance Assessment.** While the results **Climate : Carbon Balance Assessment Addendum** have somewhat changed, the proposed

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
• measures to support reductions in greenhouse gas emissions where possible; • likely impact of climate change effects upon the proposal from factors including but not limited to sea level rise, ocean acidification, changing weather patterns; • measures incorporated to enable adaptation climate change effects; • likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities; • where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements: a) avoided, b) minimised, c) mitigated, d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.	different project stages are considered: Unmitigated, the pre-Operation and Maintenance phase of the project would result in GHG emissions totalling 390,177 tCO_2eq (or 15,607 annualised). The operational phase will give rise to very minimal GHG emissions compared to the emissions savings of the overall project. The GHGA has found that the annual emission savings will amount to c1,311,190 tonnes of CO2eq, equivalent to 2% of Ireland's total GHG emissions in 2022, 4% of Ireland's non-ETS 2030 emissions target, and 43.7% of the total carbon budget for the electricity sector in 2030 as outlined in the CAP 2024. For the decommissioning phase, embodied emissions have been assumed to account for 0.2% of the GHG emissions associated with CWP Project or 902 tonnes CO_2eq. *Measures to support reduction in GHG emissions during construction* The Applicant will apply measures to support a reduction in GHG emissions during construction. It must be reiterated that on balance, the project would be a net contributor to significant GHG emissions abatement, although this is primarily focused on the operational phase. As a result, the following mitigation measures are proposed: • No idle vehicles on and offsite including Heavy Good Vehicles (HGV) holding sites,	development remains one of the largest contributors to the reduction of carbon emissions for the electricity sector. The proposed development will result in an annualised emission savings total of 1,275,891 tonnes of CO2eq, which corresponds to 42.5% of the total carbon budget for the electricity sector in 2030. The 2024 statement of compliance with Climate Change remains valid, the development complies.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	• Monitoring of construction traffic to ensure use of the designated haul routes; • Regular maintenance and servicing of all plants and machinery; • Efficient scheduling of deliveries will be undertaken to minimise emissions; and • Construction vehicles shall conform to the latest EU emissions standards and reasonably practical. In addition, the EIAR considers that opportunities for the reduction of carbon emissions during construction will be considered, including: • Undertake lifecycle assessment for major asset components and implement recommendations to influence procurement of low carbon / sustainable materials and equipment; • Procure materials for with a minimum of 20% secondary and recycled contents; • Achieve a reduction in mains water use during construction (rainwater harvesting, water re-se and efficiency systems, etc). • Reuse of materials and local sourcing as much as possible. • Reuse of rainwater and pumped water to the tune of at least 25% of water required during construction. • Diversion of waste materials from landfill/incineration to reuse or offsite or recycling of material; • Use of portable micro-renewables at satellite compound where necessary	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	as an alternative to diesel generators. As there will be limited emissions arising from the operational phase of the project, limited number of measures will be required. *Likely impacts of climate change on the project and measures incorporated to enable adaptation to climate change effects* **Chapter 28 Climate - Carbon Balance Assessment** also carried out a climate change risk assessment (CCRA) to identify the vulnerability of the project to the climate change. CWP has a worst-case low vulnerability to flooding and wind. The project has been designed to decrease vulnerabilities. A monitoring and control system in each wind turbine generator (WTG) will enable to slow or cease operation in response to high winds. Lightning protection measures have been incorporated into the design of the onshore elements of the WTG. Scour protection measures have been incorporated into the offshore WTG foundation design, while cables will be buried at an appropriate depth. In relation to the project substation, the ground will be raised to 5.00m AOD (or 360 mm above the required finished floor level), a combi-wall capping bean and embankment are provided at the perimeter to a level of 5.14m OD to address wave action and incorporation of Sustainable Drainage System (SuDS). The buildings have been designed with additional temperature tolerance and will include additional measures to increase durability.	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	It is also important to note that the substation site is currently undefended, meaning it does not avail of flood defences. As a result of the implementation of the project, this part of the Dublin Port estate will become defended. *Impacts upon climate change adaptation measures* The EIAR has not found that the CWP Project would give rise to significant effects to the existing climate change adaptation measures already in place. Application Documentation Reference **Chapter 28 Climate - Carbon Balance Assessment**	

Table 12 NMPF Seascape and Landscape Policy

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Seascape and Landscape Policy 1 Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference: a) avoid, b) minimise, or c) mitigate	**Chapter 15 SLVIA** has identified significant effects on the landscape and seascape from certain receptors as follows: Character Areas: • 1c Bray Mountain Group (significant effects arising from both WTG Layout Options during operation and maintenance (O&M)) • 2a Northern Coastal Landscape Area (LA) A (as above) • 2b Southern Coastal LA (as above),	The Applicant is cognisant of the adoption of the Greystones – Delgany and Kilcoole Local Planning Framework in February 2026. They are satisfied that they have adequately set out the reasons for proceeding and that the 2024 statement is still valid.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
significant adverse impacts on the seascape and landscape of the area. d) If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding. This policy should be included as part of statutory environmental assessments.	• TCA 6a Greystones (WTG Layout Option A during O&M) Selected Views: • Greystones (very significant effects arising from both array options during operation and maintenance (O&M)) • Kilcoole (as above) • Kilcoole Rock (as above) • Magheramore Beach (as above) • Greystones Beach Bear (as above) The CWP Project has been designed to incorporate mitigation measures to avoid and minimise insofar as possible significant effects. In particular, the Applicant has sought to reduce the number of WTGs. *Reasons for Proceeding* *SLVIA* It should be noted that whilst an effect may be significant, that does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an 'undue consequence' (GLVIA3 (Landscape Institute and IEMA, 2013) para 5.40). The professional judgement of the assessors of the SLVIA concluded that the CWP Project could be accommodated within views experienced by visual receptor groups, residents and visitors to settlements and receptors of key routes. Visual receptors perceived experience of the surrounding environment would not fundamentally change. Having regard to the policy reference to 'span and scope', expansive views would remain out across a large-scale seascape with, due to location, a greater	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	focus on immediate coastal and landscape features. The CWP Project has therefore been judged to be capable of being accommodated in SLVIA terms. Please refer to **Chapter 15 SLVIA, Section 15.4.3 Impact Assessment**. *Strategic, economic or social importance to the State* As set out in the Planning Report, the proposed CWP Project is strategic and national importance which will have hugely beneficial impacts for the country. It will support a significant share of the offshore energy targets for 2030 as well as contribute substantially to a reduction of the carbon budget for the electricity sector for 2026-2030. The carbon budget for the electricity sector was prepared on foot of the Climate Action and Low Carbon CWP Project (Amendment) Act 2021 and is legally binding. This project presents the unique opportunity to make vast contributions insofar as the annual emission savings equivalent to 43.7% for the sector. The Phase One projects were selected because they were more advanced and will start contributing significant reductions in GHG emissions years earlier than other projects and every year matters when the sectoral emissions ceiling for electricity is 20 MtCO2eq for the entirety of 2025-2030 and CWP alone eliminates c.1.3MtCO2eq in 2030. The CWP Project should proceed. *Objectives that conflict with one another or that are ambiguous with regard to their application to the proposed CWP Project*	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	The NMPF requires that any project which is not able to avoid, minimise or mitigate significant adverse impact on the landscape should be allowed to proceed provided they are able to demonstrate public benefit. Reference is made to the **Planning Report** which discusses the public benefits associated with the Project. *Inconsistencies in the NMPF* The Applicant is also of the view that there are conflicts between OMPP Seascape and Landscape Policy 1 and Sectoral Marine Planning Policy (SMPP) ORE Policy 1. Section 2 of the NMPF defines '*Overarching Marine Planning Policies (OMPPs) that will apply to all marine activities*' including the CWP Project. It then defines SMPPs as '*activity-specific or sectoral marine planning policies (SMPPs) to guide decision-makers in assessing or dealing with specific proposals'*. Section 2 does not give a sense or rating as to whether an OMPP is more important than a SMPP. Section 4 of the NMPF states that '*the OMPPs are supplemented by, and should be read in conjunction with, the SMPPs*'. On this basis, it appears that OMPPs and SMPPs are rated equally and to be read together. It is therefore considered that there are inherent conflicts between OMPP Seascape and Landscape Policy 1 and SMPP ORE Policy 1. The former requires to apply the avoid, minimise, mitigate approach to landscape/seascape impacts, while the latter requires that	

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	proposals assisting the achievement of governmental offshore renewable energy targets for 2030 be supported. It is therefore argued that given the lack of clarity and strategic nature of the CWP Project, it is considered that the CWP Project should proceed on the basis of its Strategic, economic or social importance to the State, and the conclusions of the SLVIA. Application Documentation Reference **Chapter 15 SLVIA** **Planning Report**	

Table 13 NMPF Ports, Harbours and Shipping Policies

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Ports, Harbours and Shipping Policy 2 Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts, and d) if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port	Impacts on shipping and navigation receptors are assessed in **Chapter 16 Shipping and Navigation**. Adverse impacts have been avoided and / or mitigated. A **Navigation Risk Assessment** accompanies the planning application. **Chapter 18 Material Assets - Marine Infrastructure** assesses interactions of the CWP Project with existing marine infrastructure. It also considers future aspirational plans by Dún Laoghaire Harbour (DLH) which will potentially include up to two dredged approach channels. As there is no publicly available information, DLH provided details	On foot of **Item 18** the **FIR,** the Applicant has further engaged with the operators of Dún Laoghaire Harbour. They have agreed to amend the proposed depth of cable burial near Dún Laoghaire Harbour was amended from a trench depth of 3.0 m to a minimum depth of cover of 3.0 m. The amendment can be viewed on drawing **0063 – Export Cable Burial Protection Details** which accompanies this submission. On foot of this amendment, the Applicant is satisfied that the proposed development will not prejudice future opportunities for the expansion of Dún Laoghaire Harbour and that it complies with

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
and harbour activities, proposals should set out the reasons for proceeding.	to allow CWPL to propose deeper cable burial depth to ensure no impediment to DLH potential growth plans. The project design is also mindful of proposals by DPC in relation to the 3FM project. CWPL has worked closely with DPC to ensure that the proposal before ABP does not impinge or cause any impediment to the 3FM plans. Application Documentation Reference **Chapter 16 Shipping and Navigation** **Chapter 18 Material Assets - Marine Infrastructure**	Ports, Harbours and Shipping Policy 2.
Ports, Harbours and Shipping Policy 3 Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate consideration of the National Ports Policy, the National Planning Framework, and relevant provisions related to the TEN-T network.	The proposed CWP Project is cognisant of DPC's designation as a Tier 1 Port of National Significance and as part of the Ten-T network. **Section 4.2.20** of the **Planning Report** deals with the specific provisions of the National Port Policy. The Applicant has engaged closely with DPC to ensure that the CWP Project of CWP would not impinge or hinder the potential to further develop the capacity of DPC. **Chapter 18 Material Assets - Marine Infrastructure** assesses interactions of the CWP Project with existing marine infrastructure. It also considers future aspirational plans by Dún Laoghaire Harbour (DLH) which will potentially include up to two dredged approach channels. As there is no publicly available information, DLH provided details to allow CWPL to propose deeper cable burial depth to ensure no impediment to DLH potential growth plans.	See Ports, Harbours and Shipping Policy 2 above. The development complies with Ports, Harbours and Shipping Policy 3.

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
	Application Documentation Reference **Chapter 16 Shipping and Navigation** **Chapter 18 Material Assets - Marine Infrastructure** **Planning Report**	

Safety at Sea Policies

Planning Policy Description	CWP Project Response (2024)	Review of Project Consistency with Policy following the FIR (2026)
Safety at Sea Policy 1 Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will: • Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout; and Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels.	**Chapter 16 Shipping and Navigation** assesses potential impacts on commercial and recreational vessels. Adverse impacts have been avoided and / or mitigated, and the assessment concludes no significant effects. The WTGs will have a minimum spacing of approximately 1km which is considered sufficient to facilitate transits by small vessels. Restrictions to vessel entry into the array site are not expected. The array layouts have been designed to allow Search and Rescue (SAR) lanes in at least one line of orientation. Application Documentation Reference **Chapter 16 Shipping and Navigation** **Appendix 16.3 Navigational Risk Assessment**	The proposed layout is fully compliant with the requirement to support safety-at-sea. The **FIR Response Document** and **Appendix D – Letter to IRCG re. Safety Justification** address any outstanding concerns raised under **Item 2 – Search and Rescue** of the FIR. The 2024 statement of compliance is still valid; the development complies with Safety at Sea Policy 1.

Safety at Sea Policy 2 Proposals for infrastructure that have the potential to significantly reduce under-keel clearance must demonstrate how they will, in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, or d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	In relation to under keel clearance, the EIAR found that the frequency of occurrence where issues could arise was 'remote'. CWPL proposes primary and additional mitigation, committing to not reducing water depths in the approach of DLH. The EIAR concludes that the significance of the effect is predicted to be tolerable and not significant. Application Documentation Reference **Chapter 16 Shipping and Navigation**	The proposed layout is fully compliant with the requirement to support safety-at-sea. **Chapter 16 Shipping and Navigation Addendum** has been updated as follows under paragraph 219: *'In all other areas of the OECC and array site, the Applicant will apply the approach required under MGN 654 (MCA, 2021) which aligns with the DoT Guidance on Safety of Navigation & Emergency Response: Offshore Renewable Energy Installations (OREI) (DoT, 2025) whereby water depths relative to chart datum will not be reduced by more than 5% without consulting with the MSO and Irish Lights.'* The 2024 statement of compliance is still valid; the development complies with Safety at Sea Policy 2.
Safety at Sea Policy 3 All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.	**Chapter 16 Shipping and Navigation** describes that lighting and marking as directed by Irish Lights and in compliance with the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162 (IALA, 2021a) has been assumed as embedded mitigation. Application Documentation Reference **Chapter 16 Shipping and Navigation**	The proposed layout is fully compliant with the requirement to support safety-at-sea. The **FIR Response Document** addresses any outstanding concerns raised under **Item 2 – Search and Rescue** of the FIR. The 2024 statement of compliance is still valid; the development complies with Safety at Sea Policy 3.
Safety at Sea Policy 4 Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.	**Chapter 16 Shipping and Navigation** describes that lighting and marking as directed by Irish Lights and in compliance with IALA G1162 (IALA, 2021a) has been assumed as embedded mitigation, as has marking on relevant nautical charts.	The proposed layout is fully compliant with the requirement to support safety-at-sea. The **FIR Response Document** addresses any outstanding concerns raised under **Item 2 – Search and Rescue** of the FIR.

	Application Documentation Reference **Chapter 16 Shipping and Navigation**	The 2024 statement of compliance is still valid; the development complies with Safety at Sea Policy 4.
Safety at Sea Policy 5 Proposals must identify their potential impact, if any, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. Where a proposal may have a significant impact on these operations it must demonstrate how it will, in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, or d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding, supported by parties responsible for maritime SAR.	Impacts associated with SAR operations are assessed in **Chapter 16 Shipping and Navigation.** Application Documentation Reference **Chapter 16 Shipping and Navigation**	The proposed layout is fully compliant with the requirement to support safety-at-sea. The **FIR Response Document** addresses any outstanding concerns raised under **Item 2 – Search and Rescue** of the FIR. The 2024 statement of compliance is still valid; the development complies with Safety at Sea Policy 5.

4.3.3 Project Ireland 2040 – National Planning Framework First Revision April 2025

59. In April 2025, the Cabinet adopted the first revision to the National Planning Framework. A number of National Policy Objectives (NPO) may be considered as relevant to CWP.

- *'NPO 52: Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.*
- *NPO 53: In line with the collective aims of national policy regarding climate adaptation and the associated legislative provisions, to take account of the effects of sea level changes and coastal erosion in planning and development management and to support the implementation of adaptation responses to limit risks to communities and coastal ecosystems from the impacts of coastal change'.*
- *'NPO 55: To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and off-shore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects'.*
- *'NPO 76: Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising*

prevention, reuse, recycling and recovery, to support a healthy environment, economy and society'.

- *'NPO 85: In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:*
    - *Integrating policies and objectives for the protection and restoration of biodiversity, including the principles of the mitigation hierarchy of - avoid, minimise, restore and offset - of potential biodiversity impacts, in statutory land use plan.*
    - *Retention of existing habitats which are currently important for maintaining biodiversity (at local/ regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs'.*

60. As stated in the application in relation to the draft revision to the NPF, the cables which cross the coastal area have been designed to give rise to minimum impacts, therefore maintaining the environmental quality of the coastal area. The EIAR and its Addendum address coastal erosion and found that the development would not give rise to significant adverse effect on the coast. The project before the Commission includes all elements of the electricity generation, transmission and grid connection. It has been identified as a 'Phase 1' project and was granted a maritime area consent (MAC) for its capacity to support the progressive development of offshore renewable energy in Ireland. In relation to waste that will be generated from the construction of the project, particularly waste generated as a result of onshore works, waste will be treated in the manner set out under the **EIAR Chapter 31 – Waste and Resource Management** and its **Addendum** in line with best practice and relevant legislation. Finally, CWP is cognisant of NPO 85. Reference is made to **Planning Report Appendix A – Compliance with the National Marine Planning Framework**, to the relevant **EIAR** and **EIAR Chapters Addendum**, to the **NIS** and **NIS Addendum** and to the **FIR Response Document** which demonstrates that the development has avoided, minimised or mitigated significant effects. Further elaboration in relation to a select number of OMPPs and SMPPs is provided in section 4.3.2 of this report.

4.3.4 National Development Plan Review 2025

61. The National Development Plan Review 2025 was published in the summer of 2025 and announced the Government's commitment to a total of €3.5 billion to support investment in electricity grid infrastructure over 2026 to 2030, with a view to expand electricity transmission.

62. The CWP Project includes all elements from energy generation to grid connection and will support the planned expansion of electricity transmission.

4.3.5 Programme for Government 2025 – Securing Ireland's Future

63. The Programme for Government 2025 – Securing Ireland's Future was published in January 2025 reaffirms the Government's commitment to delivering at least 5 GW of offshore wind by 2030. It also aims to facilitate employment opportunities in constructing, maintaining and servicing renewable infrastructure, with local businesses integrated in the supply chain.

64. CWP is one of the projects earmarked by government to contribute to the 5 GW target. Its development will allow for the creation of employment opportunities as stated in the planning application.

4.3.6 Climate Action Plan 2025

65. The Climate Action Plan (CAP25) is the third statutory annual update to the Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021. It sets out the actions

supporting the achievement of the national climate objectives of pursing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The plan aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by the Government in 2022.

66. The plan is to be read as the follow-on to the 2024 plan, which had been extensively discussed in the planning application.

Electricity

67. The plan estimates that the electricity sector accounted for 12.5% of Ireland's GHG emissions in 2023. This is somewhat lower than the figure reported under the 2024 plan, which inputted 14.4% of the total emissions to the sector in 2023 showing progress. It quotes the Environmental Protection Agency (EPA) Projections Report which considers that while emissions are reducing during the 2021-2025 budget, it will remain insufficient to achieve the expected targets, with 1MtCO_2eq to be carried forward into the next budget. The reduction in emission is attributed to an increase in the share of renewable electricity generation, from 38.6% in 40.7% between 2022 and 2023 and to an increase in the imports of electricity.

68. None of the actions set out under section 11.4 of the plan are directly relevant to CWP.

69. The carbon budgets remain unchanged compared to that discussed under the 2024 CWP application. However, on foot of the FIR, amendments were made to **Chapter 28 Climate – Carbon Balance Assessment**. The revised assessment found that the CWP project will generate 5,124,600 MWh annually assuming a 45% offshore capacity factor, translating to a total annual GHG emission savings equivalent to 1,707,367 tonnes of Co_2eq at the 2022 carbon intensity. This is equivalent to 56.7% of the total carbon budget for the electricity sector in 2030. Considering the embodied carbon derived from the construction, operation and maintenance and decommissioning phases are taken into account, along with the carbon released as a result of seabed disturbance, the annual emissions savings would be the equivalent to 42.5% of the total carbon budget for electricity sector in 2030.

70. The project remains a significant contributor to the achievement of the GHG reduction targets for the electricity sector.

4.3.7 Offshore Wind Energy Programme Annual Review 2024 and Key Actions for 2025

71. The Offshore Wind Energy Programme Annual Review 2024 and Key Actions for 2025 published June 2025 is extensively referred in relation to the electricity sector aspects of the CAP. The programme supports the work undertaken by the Offshore Wind Delivery Taskforce (OWDT) toward the delivery of the offshore wind targets in the CAP. It acts as a roadmap for all activities required to meet the medium term outcomes.

72. The programme notes the Marine Planning Policy Statement and the Offshore Wind Energy Marine Planning Guidelines would be published in 2025. A draft MPPS was published, and is addressed in preceding sections of this report, but not the Guidelines.

73. The programme also considers the enactment of the Marine Protected Areas (MPAs) legislation. Since the programme was published in 2025, the Government announced its intention to amend the Maritime Area Planning (MAP) Act 2021 to allow for the preparation of a Designated Maritime Area Plan (DMAP) for MPAs.

74. It also refers to the draft National Offshore Renewable Energy (ORE) DMAP Proposal and to publish the Public Participation Statement. The DMAP is discussed in the follow-on section.

75. The planning application and subsequent FIR submission, which includes inter alia, **the EIAR Addendum** and **NIS Addendum** set out on how the development does not prejudice the potential designation of MPAs. It will support the establishment of a domestic supply chain which will help deliver on the governmental offshore renewable energy commitments.

4.3.8 National Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy

76. The Department of Climate, Energy and the Environment (DCEE) published a The National DMAP for ORE in September 2025. This DMAP will be a statutory document which will set out the intention of the Government to prepare and adopt a National DMAP for ORE in accordance with Part 2 of the Maritime Area Planning Act 2021. The plan will set out the policy objectives for the development of ORE in the Irish maritime territory. The plan will include spatial designations where relevant and will set out the framework for consent for projects arising from the aforementioned spatial designations. The DMAP is to be finalised by December 2027.

77. Under section 9 of the National DMAP for ORE, the document notes that '*The National DMAP will take into account existing, permitted, and planned ORE developments, including Phase One projects, developments brought forward under the SC- DMAP, prospective ocean energy projects and test sites, which can continue to be progressed and determined prior to the adoption of this Plan. This will facilitate the continuity of those projects and plans'*.

78. This means that the DMAP will take account of the Phase 1 projects and those identified in the SC-DMAP.

4.3.9 Biodiversity – Climate Change Sectoral Adaptation Plan (BSAP) 2025

79. The National Adaptation Framework 2024 requires the preparation of Sectoral Adaptation Plans (SAPs) for 13 key sectors. The **Planning Report** considered the provision of Electricity and Gas Network Climate Change SAP. This **Planning Report Addendum** considers the Biodiversity Climate Change SAP (BSAP) which was published in 2025.

80. The BSAP is a national plan that considers the impacts of climate changes and risks on terrestrial, freshwater and marine biodiversity. It assesses sectoral consequences under two IPCC climate scenarios (RCP 4.5 and RCP 8.5). It includes a number of objectives as follows:

- *'Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change;*
- *Improve understanding of the impacts of climate change on biodiversity;*
- *Improve landscape connectivity to facilitate mobility in a changing climate;*
- *Engage society and all sectors to protect biodiversity to enhance resilience;*
- *Ensure sufficient financing is available to implement the Biodiversity Climate Change Adaptation Plan; and*
- *Put adequate monitoring and evaluation measures in place to review the implementation of the Biodiversity Climate Change Adaptation Plan.'*

81. Some of the objectives have limited relevance to the CWP project. Other aspects are considered in more details **Section 4.3.2** of this **Planning Report Addendum**, under **Appendix A – Compliance with the NMPF** and the **EIAR** and the **EIAR Addendum**.

4.4 Section 28 Ministerial Guidelines and Other Relevant Guidance

82. Since the application was submitted in September 2025, there has been no changes to existing Section 28 Ministerial Guidelines and no new guidelines published.

4.5 Regional Policy

83. Regional policy was extensively covered by the **Planning Report.** There have been no changes to the regional policy framework and therefore no further elaboration required.

4.6 Local Level Policy Framework

84. Since the submission of the planning application, the following local policy development occurred.

4.6.1 Wicklow County Council

85. Since the planning application was submitted, the Wicklow County Development Plan 2022-2028 was varied three times, with two further variations pending. Of these variations, two may be viewed as more relevant to CWP. These are discussed below.

Variation No.2 – Wicklow Town – Rathnew Local Area Plan

86. The Variation came into effect on the 12th May 2025 and replaces the Wicklow Town – Rathnew Local Area Plan (LAP) 2013-2019 which was discussed in the **Planning Report**.

87. The principal changes relate to the core strategy. The relevant natural heritage and marine spatial planning / coastal management policies that were discussed in the **Planning Report** have not been amended. It is considered that Variation No.2 has limited bearing on the proposed development. As a result of the FIR, the Applicant prepared a series on maps in support of **Addendum Chapter 15 – Seascape, Landscape and Visual Assessment** which does not result in changes to the assessment carried out by the Applicant and therefore does not result in changes to the policy compliance statements made previously.

Variation No.4 Greystones – Delgany and & Kilcoole Local Planning Framework 2026

88. The variation came into effect on the 9th February 2026. The Greystones – Delgany and Kilcoole Local Framework Plan (LPF) supersedes the 2013-2019 LAP.

89. Under section B.3 – Economic Development and Employment, specifically policy GDK30, the plan supports '*the further development of commercial and tourism related maritime / marine services sector, including services that may support the off-shore wind energy sector*'.

90. The LPF reprises the same approach as the CDP to coastal zone management, with the use of coastal cells. Greystones is split across three cells (3 to 5), which have already been discussed in the **Planning Report**.

91. The Introduction to section B.6 on Heritage, Biodiversity and Green Infrastructure helpfully confirms that the LPF does not reiterate the majority of the objectives which have already been set out in the development plan but expands on certain considerations. In particular:

'GDK58: In addition to the views and prospects in the LPF area identified for protection in the Wicklow County Development Plan, to protect the following views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an obtrusive or incongruous feature in that view / prospect. Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect:

- *V1 The view of Bray Head, Little Sugar Loaf and the higher reaches of the Great Sugar Loaf from the eastern parts of harbour area, i.e. eastern pier and higher lands immediately south of the pier (location of anchor landmark), with the built-up part of Greystones in the foreground.*
- *V2 Views southwards at the 'Horse and Hound' in Delgany Village towards Drummin Hill.*
- *V3 The views seaward from Cliff Road, Rathdown Upper*
- *V4 View from R761 north of Greystones - View northwards to Bray Head and view southwards of sea and built up area of Greystones View from R761 Windgates Coast Road of Bray Head V6 View from Cliff Road Windgates of coast, Greystones and foreground of Bray Head P1 The prospect seaward from Marine Road, Greystones P2 The prospect of the coast and sea from the R761 from the junction with the Farrankelly Road northwards to the northern boundary of Glenbrook. P3 The prospect seaward from the R761 north of Redford.*
- *V5 View from R761 Windgates Coast Road of Bray Head*
- *V6 View from Cliff Road Windgates of coast, Greystones and foreground of Bray Head P1 The prospect seaward from Marine Road, Greystones P2 The prospect of the coast and sea from the R761 from the junction with the Farrankelly Road northwards to the northern boundary of Glenbrook. P3 The prospect seaward from the R761 north of Redford'.*

92. The LPF did not introduce new views.

93. In relation to prospects, the LPF repeats two prospects that were identified in the CDP and three prospects that were already identified in the LAP, these are:

- CDP6 – The prospect of sea, cliffs and across southern slopes of Bray Head to R761 from Cliff Walk.
- CDP7 – The prospect of coast along railway line
- P1 – The prospect seaward from Marine Road, Greystones
- P2 – The prospect of the coast and sea from the R761 from the junction with the Southern Access Route northwards to the northern boundary of Glenbrook.
- P3 – The prospect seaward from the R761 north of Redford.

94. The views and prospects are presented on Map 2B Natural Heritage, an extract of which is presented below.

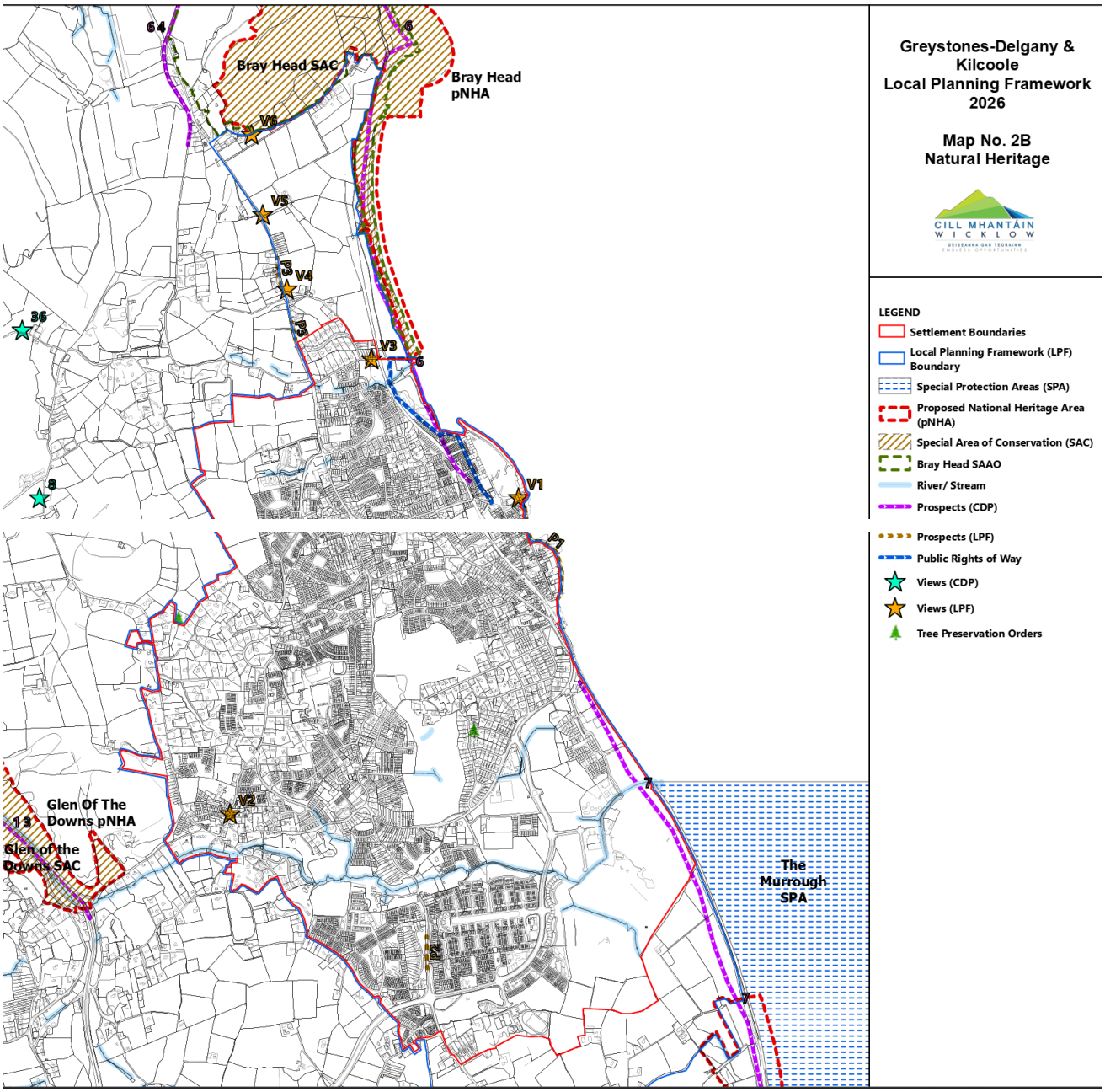


Figure 3: Extract from Map 2B of the Greystones LPF

95. The views and CDP prospects in and around Greystones were discussed in detail in the **Planning Report.** The report has assessed the compliance of the development in respect of CPO 17.38 and CPO 19.8.

96. In relation to GDK58, the wording is similar to that of CPO17.38. Given that there is a potential that it may be considered that CWP may be viewed as *'an obtrusive or incongruous feature in that view / prospect'*. It is important to highlight that the potential impact of an '*obtrusive or incongruous feature'* is qualified by the second half of the policy statement where 'Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect'. Therefore, GDK58 does require that the potential impact of a view or prospect can be weighted according to context of 'span and scope'

97. As a result of the FIR, the Applicant prepared a series on maps in support of **Chapter 15 – Seascape, Landscape and Visual Assessment Addendum** which does not result in changes to the assessment carried out by the Applicant and therefore does not result in changes to the policy compliance statements made previously. The **Planning Report** in paragraph 603 stated:

'It should also be noted that whilst an effect may be significant, that does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an 'undue consequence' (GLVIA3 (Landscape Institute and IEMA, 2013) para 5.40). The professional judgement of the assessors of the SLVIA concluded that the CWP Project could be accommodated within views experienced by visual receptor groups, residents and visitors to settlements and receptors of key routes. Visual receptors perceived experience of the surrounding environment would not fundamentally change. Having regard to the policy reference to 'span and scope', expansive views would remain out across a large-scale seascape with, due to location, a greater focus on immediate coastal and landscape features. The CWP Project has therefore been judged to be capable of being accommodated in SLVIA terms'.

98. It is submitted that criteria 37(2)(b)(i) of the PDA 2000 as amended would apply to GDK58. The arguments that had been put forward in respect of CPO 17.38 in paragraphs 607 – 609 apply in this instance too.

4.6.2 Dún Laoghaire Rathdown County Council

Dún Laoghaire Harbour Masterplan

99. The Dún Laoghaire Harbour Masterplan was published in December 2025. The masterplan sets out the vision and guiding principles behind the development and transformation of Dún Laoghaire Harbour.

100. It proposes a series of projects, which together, would revitalise the harbour facilities. One such project regards the Dún Laoghaire Cruise Ship Tendering Terminal. The terminal would support Dún Laoghaire Harbour's role as a port of call. The proposed terminal would be located on the northern end of St Michael's Pier. Other proposals regard the expansion of the recreational and tourism offer in the harbour, building on and expanding on existing assets. The Masterplan identifies the location of the proposed Operation & Maintenance facility for Dublin Array in line with the Council's ambition to support wind energy initiatives both onshore and offshore.

101. An important aspect of the masterplan is the cruise ship strategy. Large vessels of 150m and over in length have to anchor in deep water outside of the harbour. The masterplan acknowledges the 2015 withdrawn application for 340m berthing facilities. It does not include specific facilities but notes that '*the masterplan embraces flexibility and does not preclude the installation of future cruise facilities*'.

102. The Applicant refers to **Item 18** of the **FIR Response Document** and to the **Observations Response Document** whereby they address the minimum depth of cover proposed within the Dún Laoghaire Harbour Zone of Deeper Burial Depth.

4.6.3 Dublin City Council

103. There has been no relevant update to policy in the jurisdiction of Dublin City Council.

4.7 Conclusion on Consistency

104. This **Planning Report Addendum** provides an update on the marine, climate, energy and land policy framework at national, regional and local levels. This report clearly sets out the continued compliance of the proposed development with the policy framework and how it will support critical national climate and energy supply and security objectives.

5 PLANNING APPRAISAL

5.1 Environmental Impact Assessment Report Addendum

105. An **EIAR Addendum** has been prepared for the project. This Addendum also includes **Technical Appendices.** The **EIAR Addendum** has not identified additional significant negative effects to arise from the Project.

5.2 Natura Impact Statement Addendum

106. An **NIS Addendum** has been prepared for the project. It has not identified additional significant adverse effects on a Natura 2000 site.

6 CONCLUSION

107. The **Planning Report Addendum** forms part of a suite of documents submitted to The Commission in response to the FIR, in respect of the proposed development of the CWP project.

108. Having considered the previous conclusion provided in section 7 of the **Planning Report**, the Applicant has sufficiently demonstrated that:

- the proposed development is compliant with the **National Marine Planning Framework;** and
- will make substantial contributions to the achievement of the climate objective and carbon emissions budget of the **Climate Action Plan 2024** and its successors.
- The development is of strategic, economic and social importance to the State,
- and that it will support the delivery of National Strategic Objective 8 of the **Revised National Planning Framework**.
- The proposed development is also aligned with the Regional Planning Objectives of the Eastern and Midlands Regional Spatial and Economic Strategy; and
- Is wholly justified having regard to the Development Plans of the Coastal Planning Authorities.

109. The Commission is invited to conclude that the proposed development is acceptable, having regard to European, national, regional and local planning policies. It would increase the domestic production of renewable energy which would enhance the security of supply in Ireland. The CWP Project would be acceptable in respect of its likely significant effects on the environment and its likely consequences for the proper planning and sustainable development of the area.

110. The proposed development would be in accordance with the proper planning and sustainable development of the area.

111. Planning permission should be granted for the proposed development.

7 REFERENCES

112. Department of Climate, Energy and the Environment, 2025, Climate Action Plan 2025

113. Department of Climate, Energy and the Environment, 2025, Draft Marine Planning Policy Statement

114. Department of Climate, Energy and the Environment, 2025, National Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy

115. Department of Climate, Energy and the Environment, 2025, Offshore Wind Energy Programme Annual Review 2024 and Key Actions 2025

116. Department of Housing, Local Government and Heritage, 2025, Biodiversity – Climate Change Sectoral Adaptation Plan (BSAP) 2025

117. Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, National Development Plan Review 2025

118. Dún Laoghaire Rathdown County Council, 2025, Dún Laoghaire Harbour Masterplan

119. Government of Ireland, 2025, Programme for Government 2025 – Securing Ireland's Future

120. Government of Ireland, 2025, Project Ireland 2040 – National Planning Framework First Revision April 2025

121. Government of Ireland, 2025, S.I. No. 274/2025 - European Union (Planning and Development) (Renewable Energy) Regulations 2025

122. Government of Ireland, Climate Action and Low Carbon Development Act 2015, Number 46 of 2015

123. Official Journal of the European Union, 2024, Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24th June 2024 on nature restoration and amending Regulation (EU) 2022/869

124. The North Sea Summit, 2026, Joint Offshore Wind Investment Pact for the North Seas

125. Wicklow County Council, 2025, Variation No.2 – Wicklow Town – Rathnew Local Area Plan

126. Wicklow County Council, 2026, Variation No.4 Greystones – Delgany and & Kilcoole Local Planning Framework 2026

codling wind park

Planning Report Addendum

Appendix 1

NMPF Compliance / MSFD Assessment

codling
wind park

Table of Contents

Abbreviations

Abbreviation	Term in full
ACP	An Coimisiún Pleanála (The Commission)
CWP	Codling Wind Park
DHLGH	Department of Housing, Local Government and Heritagef
EIAR	Environmental Impact Assessment Report
EU	European Union
FIR	Further Information Request
LOBE	Level of Onset of Biologically adverse Effects
MMMP	Marine Mammal Mitigation Plan
MSFD	Marine Strategy Framework Directive
NMFS	National Marine Fisheries Service
NMPF	National Marine Planning Framework
O&M	Operation and Maintenance
SEL	Sound Exposure Level
UXO	Unexploded Ordnance
WTG	Wind Turbine Generator

1 National Maritime Planning Framework

'The Commission notes the information contained in the Planning Report Appendix A: Compliance with the National Marine Planning Framework submitted with the application, and Section 2.6.1 of the EIAR, which sets out how the project meets the requirements of the NMPF. The Commission also notes the March 2024 EU Commission Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and EU Commission Decision 2017/848, in particular the four thresholds established for habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2) listed in the Annex to this EU Commission Notice. The Commission considers the use of these thresholds would assist in achieving consistency in the presentation of the results across the Irish Sea Phase 1 ORE projects, and would facilitate the assessment of the relevant NMPF policies based on EU agreed indicators and thresholds.

1.1 Introduction

1. This document has been produced in response to FIR Items 3a to 3d requesting further analysis be presented with regards the **Planning Report Appendix A: Compliance with the National Marine Planning Framework** submitted with the application, and **Section 2.6.1 of the Environmental Impact Assessment Report (EIAR) Volume 2, Chapter 2, Section 2.6**, which sets out how the project meets the requirements of the NMPF. Specifically, this document provides analysis of the potential impacts associated with the project against the threshold values set under the Marine Strategy Framework Directive 2008/56/EC (MSFD) and European Union (EU) Commission Decision 2017/848, in particular the four thresholds established for habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise[1] (D11C1) and continuous noise[1] (D11C2).

2. The FIR specifically requests:

   3a - Model, map and present the areal and temporal extent of the potential impact of the proposed development for the full construction and operation campaign on the following indicators:

   the potential spatial extent of habitat lost (D6C4),

   the potential spatial extent of habitat adversely effected (D6C5),

   the modelled impulsive noise (D11C1) with and without abatement, and

   the modelled continuous noise (D11C2)

   3b - Assess the results obtained for potential habitat loss and habitat adversely affected in A above against the 2% thresholds established for habitat loss (D6C4) and the 25% threshold for adverse effects on habitats (D6C5) for the MSFD Celtic Seas North Inner Marine Reporting Unit, as detailed in Ireland's Draft Marine Strategy Part 1 Article 8, 9 and 10 report 2024 including its annexes, published in July 2024.

   3c - Assess the results obtained from modelled impulsive (with and without abatement) and continuous noise in A above against the relevant thresholds values for impulsive and continuous noise set out in the above referenced EU Commission Notice.

[1] Insofar as spatial thresholds exist, noting specific noise limit thresholds are not provided at EU level

3d Incorporate the output from A, B and C above, and all other relevant updates made as a result of this Further Information request, into a revised assessment of the NMPF policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on 'important' species and habitats as defined on page 35 and 36 of the NMPF.

The spatial extent of the modelled potential habitat loss, habitat adversely effected and impulsive and continuous noise should be provided in GIS format, see Technical NOTE Appendix A.

3. This document presents an analysis of each of the identified thresholds referred to within the FIR, responding to each of the specific questions raised by the FIR under 3a, 3b, and 3c, before drawing an overarching conclusion as requested under 3d. The conclusion reached is that the proposed project does not exceed any of the thresholds.

1.2 Habitat thresholds

1.2.1 Habitat loss (D6C4)

4. In response to FIR Item 3a i) the potential spatial extent of habitat loss (D6C4), the Applicant notes that D6C4 is a threshold value for Habitat Loss defined as follows *"The maximum proportion of a benthic broad habitat type in an assessment area that can be lost is 2 % of its natural extent (≤ 2 %)"*[2].

5. With regards to the construction and operation of the proposed project, the extent of the habitat loss will be localised to WTG and OSS locations, offshore export cables, interconnector and inter-array cables, and the area of reclaimed land from the River Liffey. This spatial extent of habitat lost for Layout Option A (75 WTGs and has a larger footprint than Option B) equates to 0.59932 km^2 as described in Table 2 of Appendix 8.2 Representative Scenario and Limits of Deviation Assessment (Chapter 08 Subtidal and Intertidal Ecology).

6. In response to FIR Item 3b, the area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962 km^2. Thus, the area of habitat loss equates to 0.0009 % of the MSFD Celtic Seas North Inner Marine Reporting Unit, which can be seen in Figure Section at the end of this document, *Figure 1 - Potential spatial extent of habitat loss (D6C4).* This is considerably lower than the 2% threshold included in the MSFD, and as such the proposed project does not exceed the D6C4 threshold and does not impede the ability to meet Good Environmental Status.

[2] Communication from the Commission – Commission Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and Commission Decision (EU) 2017/848 C/2024/1268

1.2.2 Adverse effects on habitats (D6C5)

7. In response to FIR Item 3a ii) The potential spatial extent of adverse effects on habitats (D6C5), the Applicant notes that D6C5 is a threshold value for adverse effects on habitats defined as follows *"The maximum proportion of a benthic broad habitat type in an assessment area that can be adversely affected is 25 % of its natural extent (≤ 25 %). This includes the proportion of the benthic broad habitat type that has been lost (D6C5). A benthic broad habitat type is adversely affected in an assessment area if it shows an unacceptable deviation from the reference state in its biotic and abiotic structure and functions (e.g. typical species composition, relative abundance and size structure, sensitive species or species providing key functions, recoverability and functioning of habitats and ecosystem processes) (D6C5)"*[2].

8. It is important to note, a detailed description of the subtidal and intertidal ecology assessment methodology that has been applied is presented in **Volume 3, Chapter 8 Subtidal and Intertidal Ecology** of the EIAR. In summary, taking into account the primary mitigation measures described in **Volume 3, Chapter 8 Subtidal and Intertidal Ecology**, there are no significant (adverse) effects predicted on subtidal and intertidal ecology. In this context there is not an unacceptable deviation from the reference state in any of the broad or specific benthic habitats present within the Planning Application Boundary, or the broader Zone of Influence of potential effects associated with the proposed project. There is no meaningful change anticipated in the typical species composition, abundance, sensitive species, or keystone species present. As such there is no trigger for an assessment of this threshold identified. Notwithstanding this the Applicant has undertaken a quantitative assessment in order to meet the request made.

9. With regards to construction, the extent of the habitat adversely effected will be localised to WTG and OSS anchoring operations, offshore export cables, interconnector and inter-array cables, boulder and sand wave clearance, JUV operations, and the works at landfall[3]. This spatial extent of habitat adversely effected equates to 12.09km^2 and is further described in Table 1 of Appendix 8.2 Representative Scenario and Limits of Deviation Assessment (Chapter 08 Subtidal and Intertidal Ecology).

10. With regards to operation, the extent of the habitat adversely effected will be localised to Temporary habitat disturbance relates to maintenance activities such as cable repair, vessel jack-up operations and deployment of scour protection. As temporary habitat disturbance during O&M activities will arise due to unscheduled maintenance activities the values of these activities are unknown. However, reliability and ease of maintenance have been carefully considered in the CWP Project design to minimise maintenance requirements and although maintenance activities will be carried out over a longer period of time than construction activities. The amount of habitat disturbed during repair activities is likely to be less than those of the installation of the infrastructure, as maintenance activities will be conducted in discrete locations while construction activities cover the whole CWP Project area. Given this, it is anticipated that for the purposes of a representative scenario, the impacts will be no greater than those identified for the construction phase. This spatial extent of habitat adversely effected during the operation phase equates to 12.09km^2, as described above for construction.

11. In response to item 3b, the Applicant notes that the area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962km^2. Thus, the area of habitat effected during operation equates to 0.018 % of the MSFD Celtic Seas North Inner Marine Reporting Unit, which can be seen in the Figure section at the end of this document, *Figure 2 - Potential spatial extent of adverse effects on habitats (D6C5)*. This is considerably lower than the 25% threshold included in the MSFD, and as such the operation of

[3] This area is presented separately within Table 1, and as such the total value of 12.09km^2 comprises both the total area disturbed sediments for offshore, and the total area of disturbed sediment for landfall.

the proposed project does not exceed the D6C5 threshold and does not impede the ability to meet Good Environmental Status.

12. When the combined effects of construction and operation are considered, the area of habitat effected during operation equates to 0.04 % of the MSFD Celtic Seas North Inner Marine Reporting Unit. This is considerably lower than the 25% threshold included in the MSFD, and as such the proposed project does not exceed the D6C5 threshold and does not impede the ability to meet Good Environmental Status, even when the total construction and operation effects are combined.

Noise thresholds

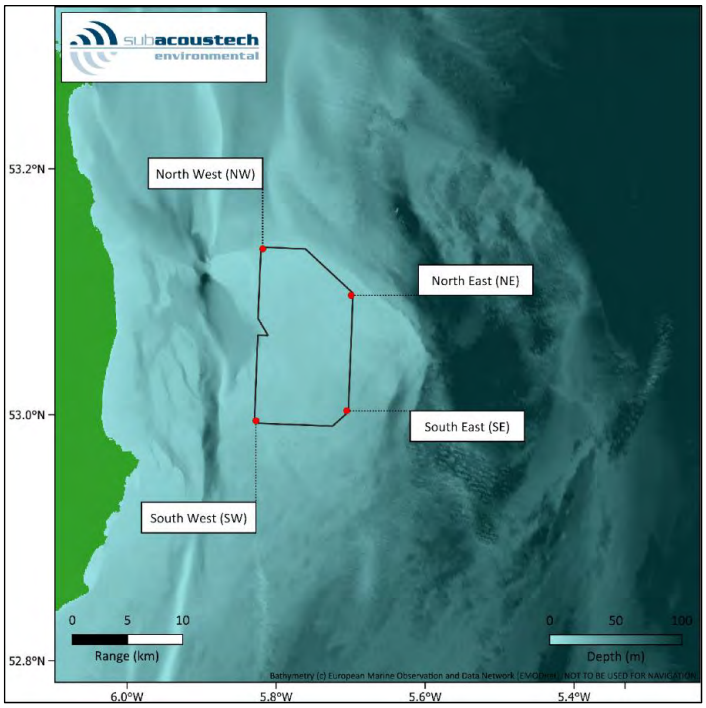
1.2.3 Modelling Approach

13. In order to model D11C1, Subacoustech Environmental, has undertaken a study in order to assess the potential underwater noise and its effects during the construction and operation of CWP. *(*For Full presentation of the modelling methodology and results see **Appendix 9-B** of the **EIAR Addendum**).

14. The modelling of impact piling, and UXO clearance, has been undertaken using the INSPIRE underwater noise model, which has been widely used for windfarm assessments around the UK and Ireland. The INSPIRE model (currently version 6.0) is a semi-empirical underwater noise propagation model based around a combination of numerical modelling, a combined geometric energy flow/hysteresis loss method, and actual measured data. It is designed to calculate the propagation of noise in shallow (i.e., generally around 100 m or less), mixed water, typical of the conditions around the UK and Ireland and well-suited for use at CWP. The INSPIRE model also accounts for environmental conditions in the region. This includes the differences that can occur with the temperature and salinity of the water throughout the day or year, as well as the sediment type in and around the site.

15. Modelling of underwater noise generated by impact piling was undertaken at four representative locations, with the loudest levels predicted at the southeast corner of the site due primarily to the deeper water found at that location. Refer to Figure 3 below. Modelling of underwater noise generated by other sources, such as vessel noise, and UXO clearance was undertaken on the basis that this could occur anywhere within the Planning Application Boundary.

Figure 3 Approximate positions of the modelling locations used at CWP



1.2.4 Impulsive Noise (D11C1)

16. In response to FIR Item 3a iii) Modelled impulsive noise (D11C1) with and without abatement, the Applicant notes that the threshold for Impulsive noise (D11C1) is defined as follows *"For short-term exposure (1 day, i.e., daily exposure), the maximum proportion of an assessment/habitat area utilised by a species of interest that is accepted to be exposed to impulsive noise levels higher than the Level of Onset of Biologically adverse Effects (LOBE), over 1 day, is 20 % or lower (≤ 20 %). For long-term exposure (1 year), the average exposure is calculated. The maximum proportion of an assessment/habitat area utilised by a species of interest that is accepted to be exposed to impulsive noise levels higher than LOBE, over 1 year on average, is 10 % or lower (≤ 10 %)."*.

17. It is important to note that the whilst the FIR refers to 'abatement' which captures a number of possible technologies and systems, the Applicant has committed to an absolute noise limit of 169 dB $L_{E,p,ss,05}$ at 750m. As such the assessment presented in the following sections, and the associated technical assessments within the **EIAR Addendum** and **NIS Addendum** for marine mammals, and fish, shellfish, and turtles, presents the implications of the proposed limit as mitigation, rather than multiple assessments of the various abatement methodologies. Therefore, the remainder of the assessment for impulsive noise focuses on 'mitigated' noise rather than 'abated'. Further details on the potential noise abatement technologies are presented in **Appendix A** of the **updated Marine Mammal Mitigation Plan** (**MMMP: Review of noise abatement methods**).

18. It is also relevant to note that the threshold associated with LOBE is not described within the accompanying literature for D11C1. As such, and following consultation with the Commission, it was recommended that the threshold values presented in Ireland's Marine Strategy Part 1, Assessment of the Marine Environment (Annex III), Department of Housing, Local Government and Heritage (DHLGH, 2025) be utilised. The Ireland's Marine Strategy document notes a threshold for LOBE (in reference to the MSFD Descriptor 11 (Underwater Noise)) of 176 dB SEL. This is reported as the *"lowest reported sound level at which bottlenose dolphins begin to experience temporary hearing loss when exposed to impulsive noise"* as presented in NMFS, 2018 (DHLGH, 2025). Bottlenose Dolphin was selected as a receptor organism for assessment of impulsive underwater noise "*since it is found throughout the Irish maritime area and is sensitive to mid-frequency sounds such as those generated by impulsive noise sources*" (DHLGH, 2025). It is important to note that the value of 176 dB SEL appears to have been selected erroneously: the results were derived from a table in NMFS 2018 that explicitly references continuous exposure to steady-state, non-impulsive noise, and therefore is incorrect. The NMFS document explicitly refers to impulsive noise thresholds, and species-specific impulsive noise thresholds as 170 dB HF-Weighted SELcum. As such the Applicant presents a detailed assessment against the impulsive noise threshold presented in NMFS 2018, but includes the outputs of the incorrect value for completeness to meet the request.

Impulsive Noise (D11C1) (Mitigated).

19. For impulsive noise the proportion of a habitat of a receptor organism exposed to noise above LOBE is assessed on two timescales. Levels of noise must not exceed 20% of the area of the habitat of a receptor organism, and the average daily exposure over a year must not exceed 10% of the habitat.

20. As noted previously, to mitigate potential impacts from impulsive underwater noise during the construction of the project, CWP commits to a limit on underwater noise of 169 dB $L_{E,p,ss,05}$ at 750m; the total impact area within the mitigation contour is 1.8 km^2 which can be seen in the Figure 4 at the end of this document, *Figure 4 - Impulsive Noise (D11C1).*

21. The area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962 km^2. Thus, the maximum area exposed to impulsive noise levels associated with the mitigated limit on underwater noise equates to 0.003 % of the MSFD Celtic Seas North Inner Marine Reporting Unit. *Refer to Figure*

4. This is considerably lower than the 20% threshold included in the MSFD for daily exposure, and the 10% threshold for impulsive noise over 1 year. As such the construction of the proposed project does not exceed the D11C1 threshold and does not impede the ability to meet Good Environmental Status.

22. With regards to the mitigated correct LOBE threshold (170 dB HF-Weighted SELcum) the maximum area exposed to impulsive noise at the LOBE threshold is 0.48km^2. This equates to 0.0007% of the MSFD Celtic Seas North Inner Marine Reporting Unit. *Refer to Figure 4.* This is considerably lower than the 20% threshold included in the MSFD for daily exposure, and the 10% threshold for impulsive noise over 1 year. As such the construction of the proposed project does not exceed the D11C1 threshold and does not impede the ability to meet Good Environmental Status.

Impulsive Noise (D11C1) (Unmitigated).

23. As noted previously, the area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962km^2. The unmitigated corrected LOBE threshold out to the 170 dB HF-Weighted SELcum threshold is 12.54 km^2. Therefore, on a given day, the proportion of an assessment area that is exposed to impulsive noise levels is 0.018% which is well below the 10 and 20% thresholds. *Refer to Figure 4.*

24. For the incorrect value (176 dB SEL), the area out to the 176 dB re 1 µPa (rms) threshold is 3,735 km^2 and can be seen in Figure 5 at the end of this document – *Figure 5 Incorrect Value D11C1 (176 dB SEL).* This is the impacted area within the MSFD's Celtic Seas North Inner Marine Reporting Unit and equates to 5.4%. Whilst this is erroneous, the proposed project does not exceed either the daily or yearly threshold.

25. For impulsive noise the proportion of a habitat of a receptor organism exposed to noise above LOBE is assessed on two timescales. Levels of noise must not exceed 20% of the area of the habitat of a receptor organism and the average daily exposure over a year must not exceed 10% of the habitat.

1.2.5 Continuous noise (D11C2)

26. In response to FIR Item 3a iv) Modelled continuous noise (D11C2), the Applicant notes that D11C2 is a criterion for modelling continuous noise and has the following threshold *"20 % of the target species habitat having noise levels above LOBE not to be exceeded in any month of the assessment year, in agreement with the conservation objective of the 80 % of the carrying capacity/habitat size"* as outlined in the Marine Strategy Framework Directive. For the proposed project it is relevant to consider continuous noise both in the context of the construction phase, during which noise will be generated principally by construction vessels and some activities, and the operation phase during which continuous noise will be generated by the operating WTGs and vessel operation.

27. **Operation.** When considering continuous noise from operational WTGs, the primary noise source is a consequence of mechanically generated vibration from the rotating machinery in the WTG transmitted into the water through the structure of the WTG tower and foundations (Nedwell *et al*., 2003; Tougaard *et al*., 2020). Indicative power outputs have been used to calculate the impacts for this study. For CWP, WTGs with power outputs from 15 to 21 MW have been used. Based on the highly precautionary NOAA Level B behavioural threshold (120 dB re 1 µPa ($L_{p,RMS}$) for non-impulsive noise; see NOAA, 2005, it is estimated that the WTGs may only reach the Level B behavioural threshold at ranges of 190 m. Please refer to *Figure 6 (D11C2) - Continuous Operational Noise*

28. **Construction.** For the purposes of identifying the greatest effects from continuous construction noise, approximate underwater noise levels have been predicted using a simple modelling approach. This is based on measurement data from Subacoustech Environmental's underwater noise measurement database scaled to relevant parameters for CWP and to the specific noise sources to be used. Continuous noise activities included in the construction assessment includes drilled piling, surveys (Multi Beam Echo-Sounders), cable laying / cable trenching and vessels, drilling and rock placement.

29. Given the modelled impact ranges, almost all marine mammals would have to be closer than 50 m from the noise sources at the start of the activity to acquire the necessary exposure for injury onset as per NMFS (2024), with the possible exception of suction dredging and rock placement for stationary receptors.

30. In most hearing groups the noise levels are low enough that this only represents a minimal risk, especially bearing in mind that many sources above are mobile. For fish, there is only a minimal risk of any injury or TTS, using the $L_{p,RMS}$ guidance for shipping and continuous noise sources in Popper *et al*. (2014), with all impact ranges predicted to be smaller than 50 m.

(D11C2) – Continuous Noise Operation

31. The area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962 km^2. For the 75 WTG layout, the total area effected is 8.5 km^2. Thus, the impacted area equates to 0.012 % of the MSFD Celtic Seas North Inner Marine Reporting Unit. This is considerably lower than the 20% threshold included in the MSFD and can be seen in Figure 6 at the end of this document, *Figure 6 (D11C2) - Continuous Operational Noise*

(D11C2) – Continuous Noise Construction (Vessels, etc)

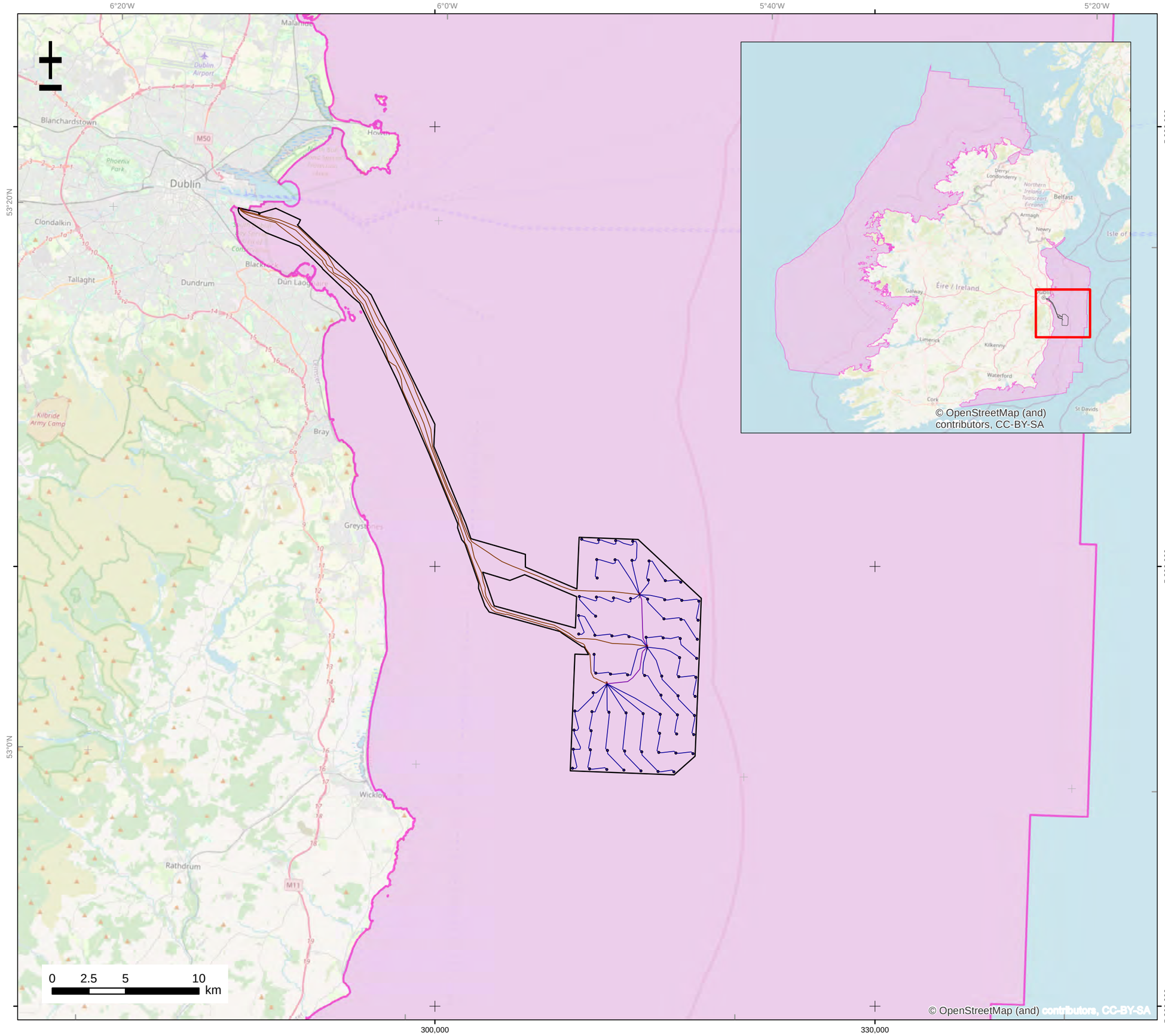
32. D11C2 is a criterion for modelling continuous noise and has the following threshold *20 % of the target species habitat having noise levels above LOBE not to be exceeded in any month of the assessment year, in agreement with the conservation objective of the 80 % of the carrying capacity/habitat size*. The area of the MSFD Celtic Seas North Inner Marine Reporting Unit is 68,962 km^2. During

construction it is anticipated that a large installation vessel will impact an area of 30.19 km^2 @ 120 dB RMS, and a medium sized vessel will impact an area 6.16 km^2 @ 120 dB RMS. The total area effected is 36.35 km^2 Thus, the impacted area equates to 0.053 % of the MSFD Celtic Seas North Inner Marine Reporting Unit. This is considerably lower than the 20% threshold included in the MSFD. Refer to Figure 7 at the end of this document, *Figure 7 (D11C2) - Continuous Construction Noise*

1.3 Conclusion

33. The NMPF is one of the main policy documents relevant to the determination of this planning application. It will be key in informing the Board's decision, in particular insofar as it relates to the offshore elements of the CWP Project. An Coimisiún Pleanála is obliged to consider the consistency of the CWP Project in relation to the Overarching Marine Planning Policies (OMPPs) and Sectoral Marine Planning Policies (SMPPs) of the NMPF. Development response to the relevant OMPPs and SMPPs remains unchanged following outputs from A, B and C. The Planning Report Addendum reviews the project compliance with the NMPF on foot of the FIR. This Appendix demonstrates how the development complies with the NMPF and will help secure its objectives. It also shows that the development does not materially contravene the plan or its OMPPs and SMPPs.

1.4 Figure List



Legend

- Celtic Sea North Inner MRU (68,962 km^2) (MSFD, 2026.01.15)

CWP proposed infrastructure

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- Offshore substation structure (CWP, 2023.08.29)
- Interarray cable (CWP, 2023.08.29)
- OSS interconector (CWP, 2023.08.29)
- Offshore export cable (CWP-MM, 2024.05.02)
- Offshore development boundary (CWP, 2023.10.04)

Total area of potential long-term habitat loss = 0.59932 km^2
0.000885% of the Celtic Sea North Inner Marine Report Unit

Background: OSM

codling wind park	*Project:* Codling Wind Park	*Contractor:* LOGO *Website:*

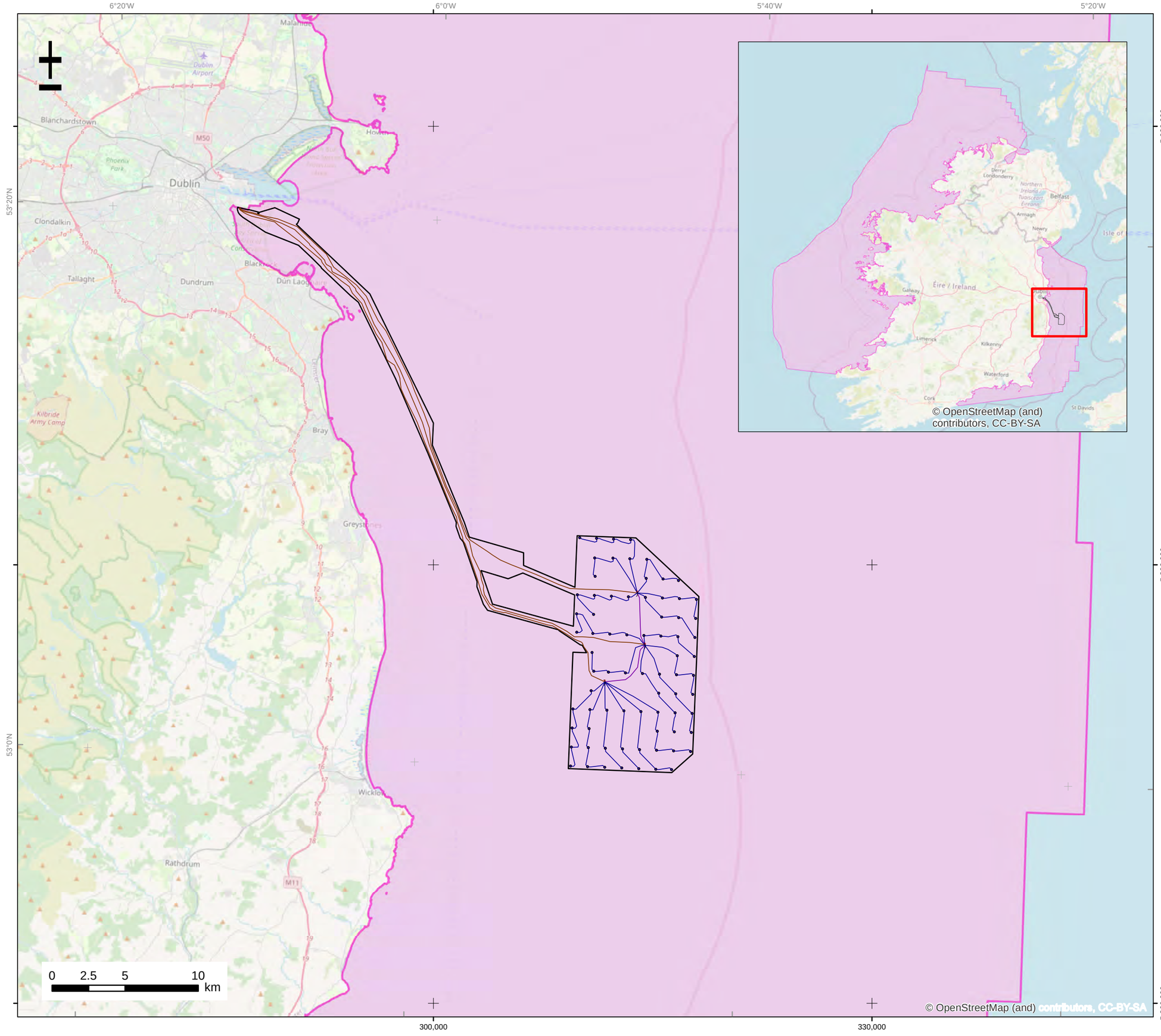
Map title: Figure 1 D6C4

Codling doc. number: CWP-CWP-ENG-08-01-MAP-2070

Internal code: OFFSH.ALL - WE.PAB..WTG.LO.75.L219..IACs.75.L219..3.OSSs..INTCs.3S..OECs.3PB - MSFD.MRU.CSNI - (OSM)

Scale: 1:250,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First issue.	2026/03/04	EA	EC/SL	ES
B	MSDF CSNI MRU. Code. Title. EPSG corrected.	2026/03/24	EA	EC/SL	ES



Legend

- Celtic Sea North Inner MRU (68,962 km²) (MSFD, 2026.01.15)

CWP proposed infrastructure

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- Offshore substation structure (CWP, 2023.08.29)
- Interarray cable (CWP, 2023.08.29)
- OSS interconector (CWP, 2023.08.29)
- Offshore export cable (CWP-MM, 2024.05.02)
- Offshore development boundary (CWP, 2023.10.04)

Total area of disturbed sediment for offshore construction activities = 12.09 km², 0.018% of the CSNI Marine Report Unit

Background: OSM

codling wind park

Project: Codling Wind Park

Contractor: LOGO

Website:

Map title: Figure 2 D6C5

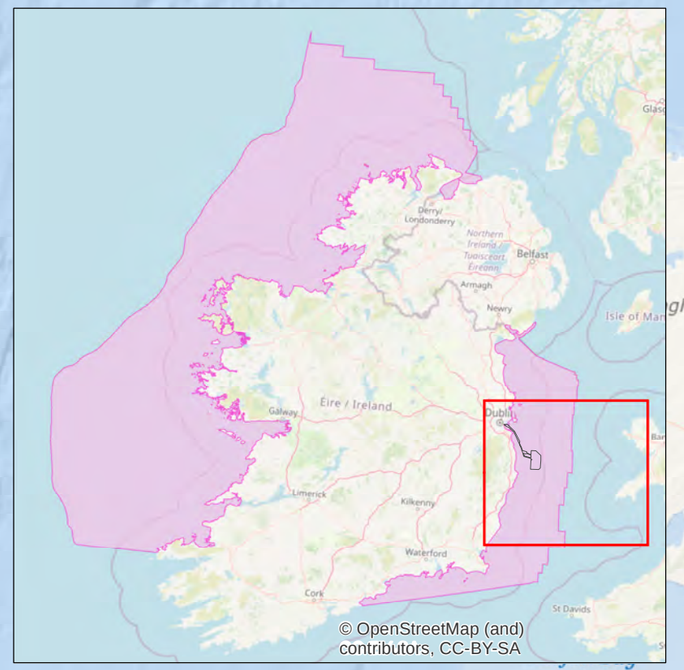
Codling doc. number: CWP-CWP-ENG-08-01-MAP-2071

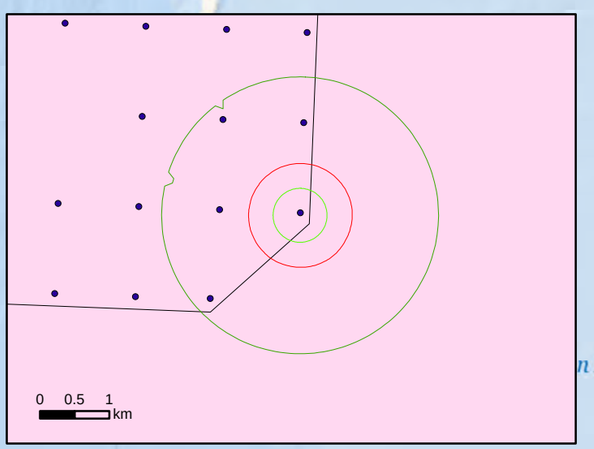
Internal code: OFFSH.ALL - WE.PAB..WTG.LO.75.L219..IACs.75.L219..3.OSSs..INTCs.3S..OECs.3PB - MSFD.MRU.CSNI - (OSM)

Scale: 1:250,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First issue.	2026/03/03	EA	EC/SL	ES
B	MSDF CSNI MRU. Code. Area value. Title. EPSG corrected.	2026/03/24	EA	EC/SL	ES

6°0'W
5°20'W
4°40'W
53°20'N
52°40'N
5,900,000
5,850,000
300,000
350,000
400,000
Dublin
Isle of Man
St. George's Channel
0 5 10 20 km
Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors, Esri, Garmin, GEBCO, NOAA





Legend

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- SE Mono Unwtd 169 dB SELss -10 dB mitigation (Subacoustech, 2026.02)
  Area within CSNI MRU = 1.76 km^2, 0.003% of the CSNI MRU
- SE MonoMR HF 170dB SELcum (St 0,0) (Subacoustech, 2026.02)
  Area within CSNI MRU = 12.54 km^2, 0.018% of the CSNI MRU
- SE MonoMR HF 170 dB SELcum (St 0,0) -10 dB mitigation (Subacoustech, 2026.02)
  Area within CSNI MRU = 0.48 km^2, 0.001% of the CSNI MRU
- CWP offshore development boundary (CWP, 2023.10.04)
- Celtic Sea North Inner MRU (68,962 km^2) (MSFD, 2026.01.15)

Background: ESRI oceans

codling wind park	*Project:* Codling Wind Park	*Contractor:* LOGO	*Website:*

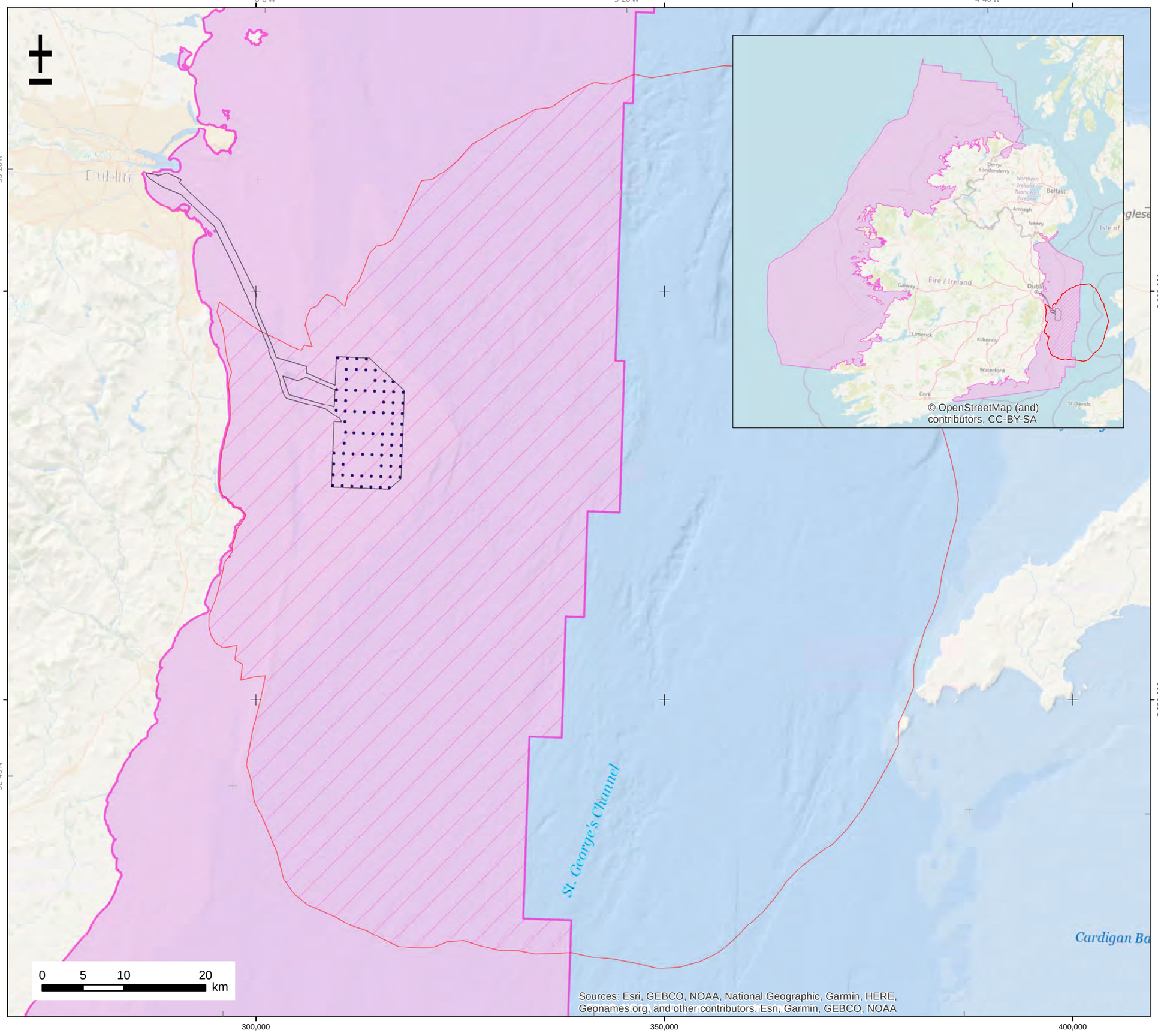
Map title: Figure 4 D11C1 Modelled impulsive 169 dB and 170 dB

Codling doc. number: CWP-CWP-ENG-08-01-MAP-2073

Internal code: IS - WE.PAB..WTG.LO.75.L219..DPNM.CONT.WTG.SE.169DB.MIT.10DB..170DB.MIT.10.DB..170DB - MSDF.MRU.CSNI - (ESRI.OCEANS)

Scale: 1:450,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First issue	2026/03/04	EA	EC/SL	ES
B	169 dB and 170 dB mitigated 10 dB. CSNI MRU. Area and % values. Zoom-in map frame. Code. SE WTG unselected. EPSG corrected.	2026/03/24	EA	EC/SL	ES



Legend

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- SE MonoMR Unwtd 176dB SELcum (St 0,0) (Subacoustech, 2026.02)
  Area within CSNI MRU = 3,735 km^2, 5.416% of the CSNI MRU
- CWP offshore development boundary (CWP, 2023.10.04)
- Celtic Sea North Inner MRU (68,962 km^2) (MSFD, 2026.01.15)

Background: ESRI oceans

codling wind park

Project: Codling Wind Park

Contractor: LOGO

Website:

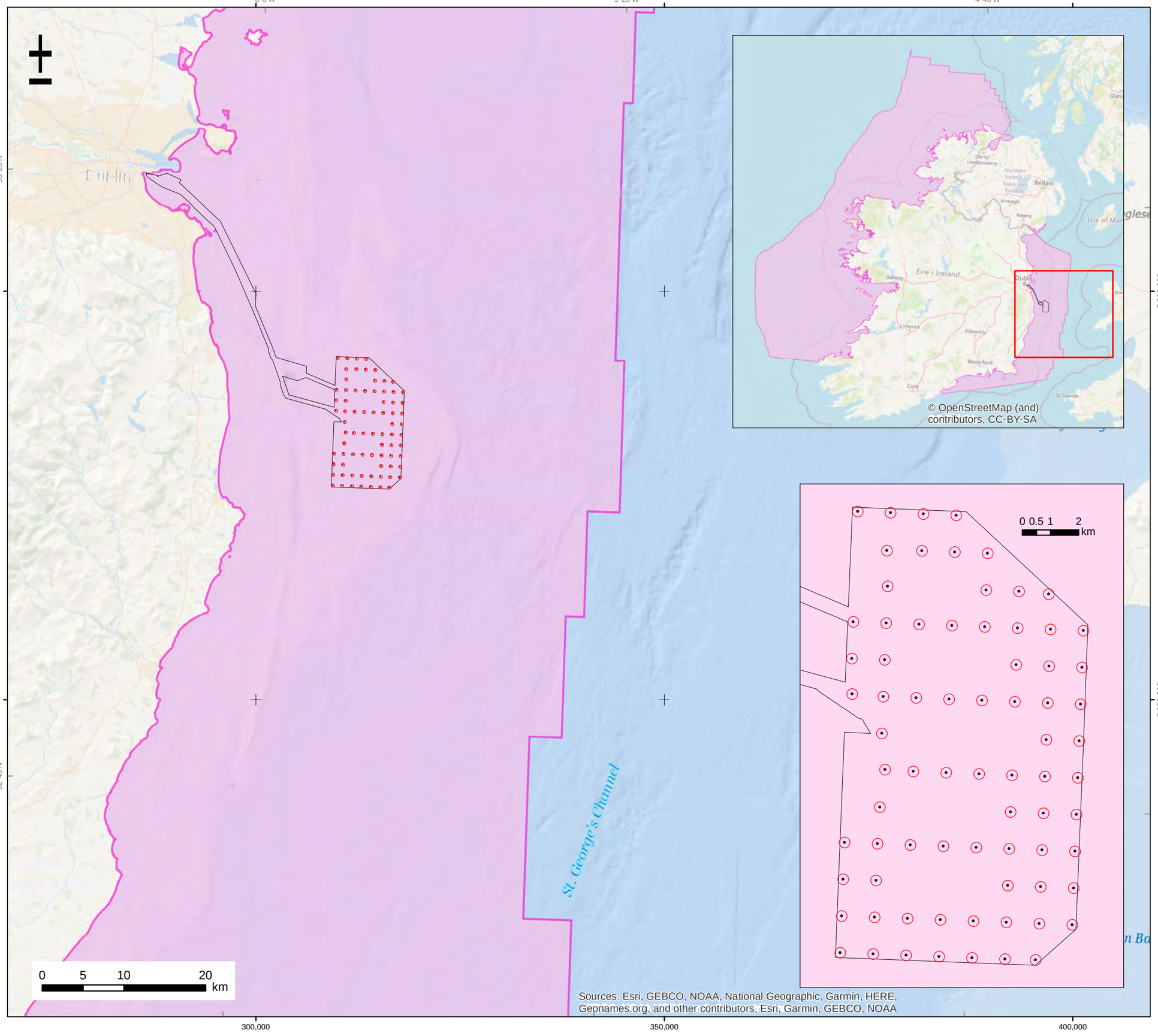
Map title: Figure 5 D11C1 Incorrect Impulsive 176 dB

Codling doc. number: CWP-CWP-ENG-08-01-MAP-2072

Internal code: IS - WE.PAB..WTG.LO.75.L219..DPNM.CONT.WTG.SE.176DB - MSFD.MRU.CSNI - (ESRI.OCEANS)

Scale: 1:450,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First Issue	2026/03/04	EA	EC/SL	ES
B	MSDF CSNI MRU. Code. Percentage.SE WTG unselected. EPSG corrected.	2026/03/24	EA	EC/SL	ES



Legend

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- Operational noise (190 m buffers from WTGs)
  SE WTG area in CSNI MRU = 0.113 km^2, 0.0002% of the CSNI MRU
  All WTGs area in CSNI MRU = 8.49 km^2, 0.012% of the CSNI MRU
- CWP offshore development boundary (CWP, 2023.10.04)
- Celtic Sea North Inner MRU (68,962 km^2) (MSFD, 2026.01.15)

Background: ESRI oceans

codling wind park

Project: Codling Wind Park

Contractor: LOGO

Website:

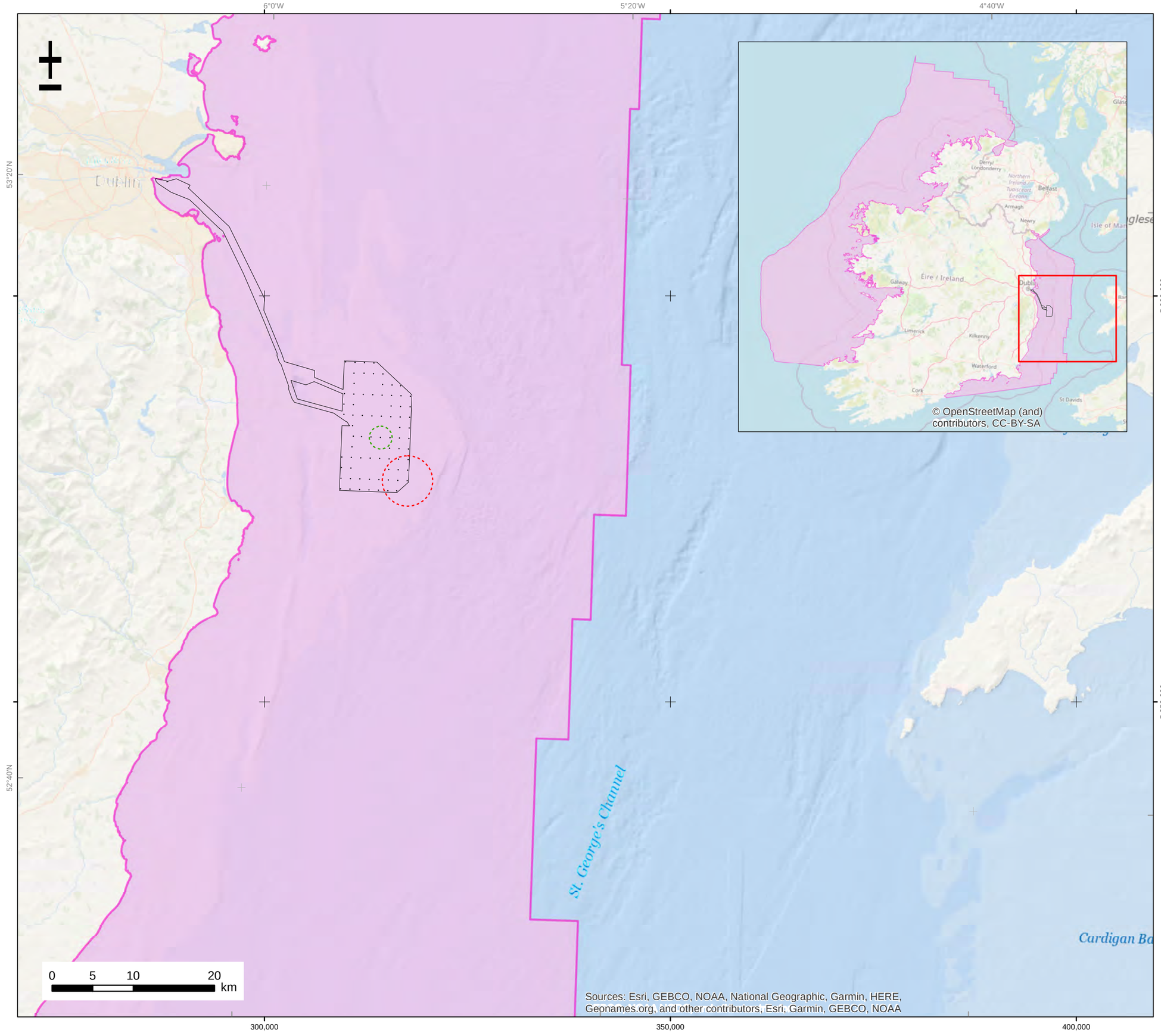
Map title: Figure 6 D11C2 Continuous operational noise

Codling doc. number: CWP-CWP-ENG-08-01-MAP-2074

Internal code: IS - WE.PAB..WTG.LO.75.L219..BUFF.190m - MSFD.MRU.CSNI - (ESRI.OCEANS)

Scale: 1:450,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First issue	2026/03/04	EA	EC/SL	ES
B	MSFD CSNI MRU. Percentages. Code. EPSG corrected.	2026/03/24	EA	EC/SL	ES



Legend

- 75 WTG layout L219 (EDF-CWP, 2023.03.07)
- Central WTG medium vessel 1.4 km radius circles at 120 dB RMS
  Area within CSNI MRU = 6.157 km^2, 0.009% of the CSNI MRU
- SE WTG large vessel 3.1 km radius circles at 120 dB RMS
  Area within CSNI MRU = 30.189 km^2, 0.044% of the CSNI MRU
- CWP offshore development boundary (CWP, 2023.10.04)
- Celtic Sea North Inner MRU (68,962 km^2) (MSFD, 2026.01.15)

Background: ESRI oceans

codling wind park	*Project:* Codling Wind Park	*Contractor:* LOGO *Website:*

Map title: Figure 7 D11C2 Continuous Construction Vessel noise

Codling doc. number: CWP-CWP-ENG-08-01-MAP-2075

Internal code: IS - WE.PAB..WTG.LO.75.L219..BUFF.1400m..BUFF.3100m - MSFD.MRU.CSNI - (ESRI.OCEANS)

Scale: 1:450,000 at A3 | *XY CS:* EPSG 25830 | *Z ref:* NA

Rev	Updates	Date	By	Chk'd	App'd
A	First issue	2026/03/04	EA	EC/SL	ES
B	All WTGs buffers off. Medium vessel buffer moved to another WTG. CSNI MRU. Percentages. Code. EPSG corrected.	2026/03/24	EA	EC/SL	ES