**FS007358 Statkraft North Irish Sea Array (NISA) Site Investigations for Export Cable Route.**

**Public Submissions (consolidated and redacted) made during consultation period**

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*Submission 1.*

**From:**[redacted]@yahoo.co.uk <[redacted]@yahoo.co.uk>
**Sent:** Monday 30 August 2021 22:11
**To:** Housing Foreshore <foreshore@housing.gov.ie>
**Subject:** Foreshore licence application

Hi, my name is [redacted]. I'm very concerned about my livelihood as a fisherman from Skerries and I fish these grounds with crab and whelk pots.

Regards [redacted]

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*Submission 2.*

**Foreshore Unit,**

**Department of Housing, Local Government and Heritage,**

**Newtown Road,**

**Wexford,**

**Co Wexford**

**Planning Application Reference Number: FS007358**

**Applicant:** North Irish Sea Array Windfarm Limited, a fully owned subsidiary of Statkraft Ireland Ltd.

**Description of Development:** Site Investigations for Export Cable Route

To Whom it Concerns,

I refer to the above planning application & wish to make the following submission in relation to the same.

I am making this response as a person directly dependant on a Commercial Inshore Fishing Enterprise, and am concerned the project outlined will impact negatively on this enterprise.

I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, and my livelihood. I am also concerned about displacement of fishing activity as a result in the wider area and the negative impact this will have on this enterprise.

In the event that it's not possible to avoid this negative impact then I ask consent be withheld for the proposed activity until a disturbance mitigation plan is agreed between myself and the applicant.

The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following latitude and longitude coordinates

NorEH = 53o37.45 SoutH = 53o30.13

EAST = 53o32.31 WEST = 53o30.38

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/bi valve ~~mollusc/whitefish~~/, during the months

of MARCH Till December

By means of *(cross out as appropriate)* pots//~~demersal trawl/mid water/bottom dredge/other~~.

- Operating in the area roughly bound by the following latitude and longitude coordinates

NorEH = 53o37.45 SoutH = 53o30.13

EAST = 53o32.31 WEST = 53o30.38

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~bi-valve mollusc~~/whitefish/, other species, during the months of MARCH Till December

By means of *(cross out as appropriate)* pots/static nets/~~demersal trawl/mid water trawl/bottom dredge/hooks and lines/other~~

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours on a 24/7/365 basis

I would also like to raise the following points:

I have allmost 1000 pots (crab Lobster and whelks) pots in this area for allmost 10 ~~month~~ mo of the year. It is allmost Impossible for me to shift them as there is no other Fishing ground. to fish as we fish from (RUSH harbour) is A tidal harbour it is only small and no room to Hold pots..

Name: [redacted] [redacted]

Boat name [redacted] & Reg No. [redacted]

Other Fishing Vessels owned

—

I am a Skipper ✓ tick or Crew tick Shore Manager tick Other tick

Address [redacted] co Dublin

Phone no: [redacted]

Email:

Signed [redacted]

Date 13-9-2021

*Submission 3.*

**From:** [redacted] <[redacted]@gmail.com>
**Sent:** Wednesday 15 September 2021 20:30
**To:** Housing Foreshore <foreshore@housing.gov.ie>
**Subject:** Planning application ref number FS007358. North Irish sea array windfarm limited...Statkraft Ireland ltd

To whom it may concern.

I refer to above application and wish to make a submission.

I am a commercial fisherman and I am concerned this will have a direct impact on my work.

I acknowledge the application is for site works but I'm very concerned it will negatively affect my financial ability and livelihood.

In the event that's its not possible to avoid negative impact then I ask consent to be withheld for the proposed activity until a disturbance mitigation plan is agreed between myself and application.

I fish crab and whelk in and around these areas for survey from ports of howth and land in Rush loughshinny and Skerries at times.

My boat is called [redacted]

[redacted]

Regards [redacted]

*Submission 4.*

**Foreshore Unit,**

**Department of Housing, Local Government and Heritage,**

**Newtown Road,**

**Wexford,**

**Co Wexford**

**Planning Application Reference Number: FS007358**

**Applicant:** North Irish Sea Array Windfarm Limited, a fully owned subsidiary of Statkraft Ireland Ltd.

**Description of Development:** Site Investigations for Export Cable Route

To Whom it Concerns,

I refer to the above planning application & wish to make the following submission in relation to the same.

I am making this response as a person directly dependant on a Commercial Inshore Fishing Enterprise, and am concerned the project outlined will impact negatively on this enterprise.

I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, and my livelihood. I am also concerned about displacement of fishing activity as a result in the wider area and the negative impact this will have on this enterprise.

In the event that it's not possible to avoid this negative impact then I ask consent be withheld for the proposed activity until a disturbance mitigation plan is agreed between myself and the applicant.

The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following latitude and longitude coordinates

Between Rush North to Rundalk out East to Prawn Grounds

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/bi ~~valve mollusc~~/~~whitefish~~/, during the months

of 12 Months

By means of *(cross out as appropriate)* pots//demersal trawl/m/bottom dredge/other.

- Operating in the area roughly bound by the following latitude and longitude coordinates

as above

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~bi valve mollusc~~/~~whitefish~~/, ~~other species~~, during the months of as above

By means of *(cross out as appropriate)* pots/~~static nets~~/~~demersal trawl~~/~~mid water trawl~~/~~bottom dredge~~/~~hooks and lines~~/other

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours on a 24/7/365 basis

I would also like to raise the following points:

I am dependent solely on fishing in this area

Name: [redacted]

Boat name [redacted] & Reg No. [redacted]

Other Fishing Vessels owned

N/A

I am a Skipper ✓ tick or Crew 1 tick Shore Manager tick Other tick

Address [redacted] Skerries

Co. Dublin

Phone no: 08 [redacted]

Email: [redacted] @hotmail.com

[redacted]

Signed [redacted]

Date 11/9/21

*Submission 5.*

NIFA

www.inshore.ie

NIFO

nifa.secretary@gmail.com

nifo.secretary@gmail.com

The Pier,
Cahirciveen,
Co. Kerry,

14/09/21

To whom it may concern,

With reference to planning application reference number FS007358, by North Irish Sea Array Windfarm Limited, of Building 4200, Cork Airport Business Park, Co. Cork, T12 D23C, The National Inshore Fishermen's Association (NIFA) and the National Inshore Fishermen's Organisation (NIFO) wish to make the following joint submission.

We acknowledge that the applicant has consulted with the fishing Industry, which has included some of our members. We would always advocate that applicants consult directly with operators likely to be directly affected on such projects and commend the applicant on their efforts in this regard to date. That's said however we have members that have raised, what we feel are valid concerns regarding this application. This submission is based on the same, the main points being as follows

**Importance of area to Inshore Fishing Activity**

The area in question is important in general to Inshore Commercial fishing, particularly static gear fishing using pots targeting whelk, brown and velvet crab and lobster and also using towed gear for razor clams, along the coast and prawns at the eastern side of the area. It is of particular importance to a number of our members, operating from the ports of Howth, Skerries, Rush, Balbriggan and Loughshinny, with one member having a traditional dependency solely and exclusively on this area. It is also important to note that some of these harbours are tidal and having clear access to them around high tide, irrespective of the time is vital.

Members concerned, operate small vessels, typically between seven and twelve meters in length, given the size of these vessels and the nature of fishing activity in the broader general area, operating elsewhere, to where the traditionally have done, is not realistically a viable option for them, even on short term basis. Some members have a more seasonal dependency on it particularly when targeting brown crab from early Autumn to early Spring. Given its general importance in terms of supporting static gear fisheries and high level of

activity in the area a high volume and density of static gear is deployed in the area on a year round basis.

**Likely disruption of activity and economic impact caused by the same**

While we appreciate this application is for site investigation works, our members are concerned that these works will disrupt their fishing operations and this disruption will have a negative economic impact on them. The extent of that disturbance is still unknown and will likely vary between members. Given the density of fishing activity, both in this specific and adjacent areas. and the nature of the survey work, disruption is highly likely, and may involve static gear operators having to move gear, to avoid damage or loss to it, in advance of the survey. Previous experience with similar applications proved this to be the case.

We also have members that traditionally operate on the fringes or adjacent to the area in question. These members are concerned about the secondary effects of displacement into areas in which they traditionally operate. Any displacement of this nature will undoubtably have a negative impact on them, such is the nature of the fishing operations in question.

Our position is than any disruption should be kept to an absolute minimum. Given that avoiding this disruption completely is highly unlikely we ask that consent to proceed be withheld until a disturbance mitigation plan is agreed with our relevant members. This plan needs to be designed to keep displacement of activity to an absolute minimum , but where displacement occurs and in turn has a negative impact on members working outside of the area, the mitigation plan and agreement needs to take these members into account also.

**Finally to conclude**, we would like to thank DHLGH for the opportunity to make this submission and we trust our concerns will be given the consideration they deserve.

IWDG

Irish Whale and Dolphin Group

Dept. of Housing Local Government and Heritage

Email: foreshore@housing.gov.ie

[redacted]

Re: **Public Consultation: FS007358 Statkraft North Irish Sea Array (NISA) Site Investigations for Export Cable Route**

Dear Sir or Madam

The IWDG is not resourced to properly evaluate all foreshore applications but a brief look at the following application we believe merits a few observations as follows:

1. Quoting the NPWS mitigation measures as protection from impacts that are quite distant from surveys is nonsense. NPWS mitigation measures applied during activities are for reducing impact in the vicinity of operations out to 1 km as standard or 500m, not 50 or 100km from the site in Wales or elsewhere. This requires temporal and spatial mitigation which is not discussed that we have seen.
2. Mitigation measures as standard do not offer protection for Annex IV species once operations begin as they do not employ a shutdown under any circumstances and may operate without cessation thereby inhibiting any ability to mitigate impacts.
3. Mitigation measures have no poor visibility or darkness capability and therefore it needs to be clear that surveys cannot under proposed mitigation measures operate in fog, rain, sea state 5 or greater and darkness without some additional measures. It is proposed that a detailed mitigation plan should be submitted to explain how it is proposed mitigation measures are to operate.
4. Operations of geophysical equipment need to be cognizant of frequency of systems used and their impacts and appropriate dB or sound level changes during any soft start or ramp up of activity. This should ensure the soft start is an audible one in line with industry standards for seismic (see report 579 IAGC/IOGP).

Generally it is good practice to prepare a mitigation plan and this is now common place in many industry operations. This allows the practices employed in mitigation to be understood by the public



Irish Whale and Dolphin Group Ltd.,
Merchant's Quay, Kilrush, Co. Clare, V15 E762, Ireland
Tel: +353 (0)65 9051763 ~ 086 854 5450
Email: enquiries@iwdg.ie website: www.iwdg.ie
Registered Charity No.: CHY11163 : Limited Company No. 332093

and those actually responsible for the mitigation. Currently off Ireland there are a variety of mitigation practices in place for different surveys using similar equipment. Some appear to use passive acoustic monitoring and others do not and generally the NPWS guidelines do not support acoustic monitoring, but do not offer any alternative ability to detect animals underwater or at night for example. There is an urgent requirement therefore to either bring the current NPWS guidelines in line with international best practice and legal requirements. A mitigation plan submitted with applications is a well established practice and meantime could be used to deal with deficiencies in the NPWS guidelines. However mitigation plans are still best practice and will be more easy to write with coherent, clear, operable guidelines.

Yours faithfully

[redacted] IWDG
[redacted]@iwdg.ie