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

Prescribed Bodies Submissions for:

-Inland Fisheries Ireland

-Marine Institute

-Dept. Housing, Local Government, Heritage - Underwater Archaeology Unit & Nature Conservation (National Parks & Wildlife Service)

-Department Agriculture, Food and the Marine

-Sea Fisheries Protection Authority

- Marine Survey Office

- Louth County Council

Iascach Intíre Éireann
Inland Fisheries Ireland

MARINE LICENCE VETTING COMMITTEE:
RE: Request for observations

Request for observations from Mr. [redacted] (DHLGH) dated 16.08.2021

Overview:

This application is to determine the site location for the exporting cable laying. This is in conjunction with FS007031 on site array location.

3 landfall and routes will be investigated to determine the optimum design for project.

Survey Types:

Type of surveys proposed (e.g. geophysical, geotechnical, archaeological or benthic.)

- Geophysical Survey (Mutibean Echosounder, Side Scan sonar, Magnetometer, Sub bottom profiler, Seismic sound source)
- Geotechnical Surveys including Boreholes, Cone Penetration Tests (CPTs) and VibroCores (VCs)
- Ecology Surveys – bird, fisheries and marine mammals survey including benthic grab sampling as appropriate
- Archaeological Survey

IFI Comment

The NIS raises concerns about the 'in combination effects' with the Braymore Point Offshore Wind Farm (FS006973) with the potential that works are ongoing at the same time. While the NIS raises concerns for marine mammals the local fish population will be subjected to these on-going noise disturbances also. The mitigation measures to engage with Braymore Point operators is welcomed with every effort made to reduce the impact on the local fish population.

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A number of migratory fish species are associated with the rivers located along this coastline, including Atlantic salmon, sea trout, European eel, sea- and river lamprey. Life stages of these species may be traversing the study area both during the upstream migration to freshwater and during the outmigration to the sea. Sound generation and transmission during the proposed surveys here would disperse widely in water and could propagate into the migration paths of these fish life stages.

The overall area has a high value as a marine sport fish zone, both for shore angling and for boat fishing. The shoreline from Skerries to Rush up to Balbriggan are important angling locations. All of the target fish species, as well as the angling facility, are likely to be impacted adversely by the sound-generating and – propagating marine surveys. We recommend engaging with the local clubs in advance of surveys.

Mitigation measures in regard to the timing of works and also in regard to levels and duration of noise generation and potential for adverse impact on fish species should be agreed with Foreshore Division of DHLGH and form part of any foreshore licence. IFI would point out that the mitigation measures and guidance of NPWS in regard to marine mammals are not transferrable to fish species. The fish remain invisible to any shore- or boat-based observer. Mitigation measures should aim to reduce the sound generated, in intensity and duration. Seasonality of the sampling and a short sampling window may also provide some mitigation. The comments of IFI in this regard relate to fish species of conservation significance and of leisure angling significance all of which constitute part of IFI's brief.

These mitigations should cover:

- Use of soft-start and ramp-up procedures for any sound-generating surveys undertaken – both on a day-to-day basis and on re-start after any stoppages within any day
- duration of noise-generating surveys to be reduced to the minimum necessary to collect results of sufficient quality
- Agreed timing of works so as not to interfere with migration times of fish life stages or with scientific studies currently in place in the proposed survey area

The IFI comments above do not cover commercial marine fish and the advice of SFPA should be sought in regard to impacts on the eggs/larvae and adult life stages of commercially important fish species in the area of proposed works.

The ecological surveys should capture the biodiversity of the area and be designed so that any benefits from the windfarm i.e. reef formation for marine species can be captured over time.

The local IFI office should be informed 5 days before surveys commence.

[redacted] (IFI R&D), [redacted] & [redacted] (IFI)
10.09.2021

Marine Institute

Date: 14/09/2021

To: [redacted], Foreshore - DHLGH

From: [redacted], Marine Institute

Re: FS007358 North Irish Sea Array Cable Assessment Area Site Investigations – North Irish Sea Array Windfarm Limited

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North Irish Sea Array Windfarm Limited submitted a foreshore application for a series of site investigation works to be carried out in a defined area on the Meath and Dublin coasts and along corridors towards the coastline to sections of the coast at Braymore and Skerries. It is noted this survey covers the cable route only and not the wider proposed windfarm area.

In addition to the application form the applicants submitted a number other documents including, *inter alia*:

- NISA Cable Assessment Area, Schedule of Works
- NISA Cable Assessment Area, Natura Impact Statement

The overall aim of the site investigations is to collect the necessary data and information required to inform the engineering and detailed design of the cable route ashore. The possible installation of a windfarm and associated infrastructure in the area in the future would be the subject of a separate Foreshore Lease / Licence application and is not the subject of this current application.

Four types of surveys are proposed:

- Geophysical Survey (Mutibean Echosounder, Side Scan sonar, Magnetometer, Sub bottom profiler, Seismic sound source)
- Geotechnical Surveys including Boreholes, Cone Penetration Tests (CPTs) and VibroCores (VCs)
- Ecology Surveys – bird, fisheries and marine mammals survey including benthic grab sampling as appropriate
- Archaeological Survey

The proposed site investigation methods are standard and have been used in similar investigations in Irish waters and internationally.

It is intended that the proposed survey works would be phased over a period of 3 years following award of licence.

There are no licenced aquaculture sites within the proposed site investigation area on the Foreshore and therefore impacts on aquaculture are not considered likely.

There is commercial fishing activity within the proposed site investigation area on the Foreshore and therefore some interaction with fishing activity may occur. Notwithstanding this, it is noted that the applicant has appointed a Fisheries Liaison Officer who will engage with the fishing community in the area.

The NIS submitted identifies a number of risks to conservation features (e.g., marine mammals) likely to result from the proposed activity. As mitigation, a number of actions are suggested that should reduce the risk. Foremost among these is the use of marine mammal observers (MMO) during operations including a 'soft start' protocol. The MI is satisfied that such measures will mitigate any risk to marine mammals during the site investigations. It is advised that DHLGH identify any similar geophysical surveys that may be carried along the east coast be identified and that they

not coincide with this survey. It would be important that any geophysical surveys be carried out in isolation so as to avoid any potential cumulative effects on marine mammals.

On the basis of the above and considering the nature, scale and location of the proposed site investigations the Marine Institute is satisfied that the site investigations as proposed will not have a significant impact on the marine environment in the survey area and will not have a significant impact on other legitimate uses / users of the area and therefore has no objections to a licence being granted. It is recommended that the following specific conditions should be attached to any licence that may issue.

1. The Licensee shall use that part of the Foreshore the subject matter of this licence for the purposes as outlined in the application and for no other purposes whatsoever.
2. The Licensee shall ensure that the works are carried out and completed in accordance with the plans and particulars lodged with the application.
3. The Licensee shall appoint a Fisheries Liaison Officer who shall consult with the SFPA, relevant fishermen's groups and charter boat skippers in order that appropriate actions can be taken to avoid or minimize any interactions with ongoing fishing / angling activities in the area during the course of the investigations.
4. The licensee will engage the services of a MMO who will ensure the Protocols specified in the Marine Mammal Mitigation Plan are fully implemented.

Submission 3 - Dept. Housing, Local Government & Heritage: Underwater Archaeology Unit and National Parks & Wildlife Service

From: Fem Dau <Fem.Dau@housing.gov.ie>
Sent: Friday 17 September 2021 11:10
To: Housing Foreshore <foreshore@housing.gov.ie>
Subject: FS007358

A chara,

Please find the heritage recommendations of the Department for the above mentioned application.

Underwater Archaeology

It is noted that the proposed site investigation area is located in an area of high underwater archaeological potential. The Wreck Inventory of Ireland Database (WIID) lists numerous wrecks for the proposed development area, which are subject to statutory protection under section 3 of the 1987 National Monuments (Amendment) Act. Given the location of the proposed site and the nature of the works it is possible that underwater archaeology may be impacted by these operations. It is therefore recommended that the following be attached as conditions to the foreshore licence:

The proposed geophysical surveys should be licenced under the National Monuments Acts 1930-2014. The proposed marine geophysical surveys shall be carried out in compliance with the with the Department's guidelines "General Requirements for a Geophysical Survey for Archaeological Purposes".

It is recommended that the geophysical surveys be carried out in advance of the site investigation and geotechnical works taking place. The geophysical data for all proposed SI and geotechnical investigation locations and grab sample locations etc should be assessed by a suitably qualified archaeologist to ensure that the proposed works do not negatively impact on locations where there is known or potential archaeology. A report summarising the assessment of the geophysical data should be forwarded to this office for review prior to the SI and geotechnical works taking place. Where archaeological material/features are shown to be present, preservation in situ, avoidance, preservation by record (archaeological excavation) or archaeological monitoring may be required. The applicant shall be prepared to be advised by the Department of Housing, Local Government and Heritage in this regard.

It is also recommended that an intertidal and metal detection survey should be carried out of all landfall areas where SI works and grab samples are to be taken. Both surveys should be licensed under the National Monuments Acts 1930-2014 and carried out by an archaeologist suitably qualified in maritime archaeology.

The results of the geotechnical investigations should be assessed by a suitably qualified archaeologist and this assessment should feed into the overall archaeological assessment of the proposed wind farm project.

If any clarification is required on any of the above do not hesitate to contact this office. An officer from this office would also be available to meet to discuss the above.

It should be borne in mind, that if significant archaeological remains are found, further archaeological mitigation might be required.

Nature Conservation

The objective of this proposed site investigation activities is to determine detailed site conditions including seafloor geology and environmental characteristics. This includes detailed mapping of geology, seabed features (i.e. archaeology) and baseline environmental conditions within the

site. This will provide confirmation of seabed character and all geotechnical design data for the proposed windfarm export cable corridor. The data will also allow impacts to be predicted, and subsequently appropriate mitigation measures to be developed. It may also be used at a later stage to provide a baseline for the purpose of post construction and operational stage monitoring as well as decommissioning studies. The proposed development would use the following equipment to survey:

- Multibeam Echosounder (MBES)
- Side Scan Sonar (SSS)
- Magnetometer
- Sub-bottom Profiling (SBP)
- Higher Energy Sub-surface Acoustic Sources (for example: Sparker systems, eSource)
- Downhole Sampling
- Cone Penetration Tests
- Vibrocore samples

In addition there would be a range of ecological data collected as part of the programme. This Foreshore Licence application is for site investigations necessary to establish the optimum location for and design of the export cable(s) to shore and to establish the most appropriate landfall location for the export cable(s) for the North Irish Sea Array (NISA), located off the coasts of Dublin, Meath and Louth. The proposed application has been assessed by means of a Natura Impact Statement.

Kind regards,

[redacted]

From: Fem Dau <Fem.Dau@housing.gov.ie>
Sent: Tuesday 21 September 2021 14:12
To: [redacted] (Housing) <[redacted]@housing.gov.ie>
Subject: RE: Attn: [redacted]. Re: Recent NPWS Submission for FS007358 Statkraft NISA Cable Route

HI [redacted],

Please see updated NPWS obs below.

Nature Conservation
The proposed site survey to support the development of the North Irish Sea Array windfarm has been evaluated by a Natura Impact Statement (NIS) and other documents. The conclusion of the Natura Impact Statement document is that the proposed works are unlikely to pose a significant likely risk to nature conservation interests in the vicinity. It is noted that potential interaction with marine mammals can be ameliorated by the application of "Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters".

National Parks & Wildlife Service concur with this conclusion in and request that mitigation outlined in Section 6.2 of the NIS document is implemented in full.

Kind regards,

[redacted]

Submission 4 - Dept. Agriculture, Food and the Marine

From: [redacted] <[redacted]@agriculture.gov.ie>
Sent: Monday 20 September 2021 17:13
To: [redacted] (Housing) <[redacted]@housing.gov.ie>
Cc: Foreshore <Foreshore@agriculture.gov.ie>
Subject: RE: ATTN: [redacted]. FS007358 Statkraft North Irish Sea Array Cable Route Site Investigations - Notice of Public Consultation Period.

Hi [redacted]

The following observation has been made to the Department of Agriculture, Food and the Marine with regard to the proposed development and the possible impact on fisheries. Please note this in your consideration of any licence.

Furthermore, I attach the observations of the Marine Institute. As these observations are comprehensive and do not relate to specific conditions of a licence, I am attaching the full document for your consideration.

I trust this is helpful.

Regards

[redacted]
Foreshore Administration

"Although this area is not generally noted for seed mussel it is important to point out that the seed resource is scarce currently and if seed beds develop in this area in the future the mussel operators must be have access to the resource."

…

Marine Institute

Date: 14/09/2021

To: [redacted] Foreshore - DAFM

From: [redacted] Marine Institute

Re: FW-2-20 - North Irish Sea Array Cable Assessment Area Site Investigations – North Irish Sea Array Windfarm Limited (DHLGH Ref No. FS007358)

North Irish Sea Array Windfarm Limited submitted a foreshore application for a series of site investigation works to be carried out in a defined along the Meath and Dublin coasts and on corridors towards the coastline to sections of the coast at Braymore and Skerries. In addition to the application form the applicants submitted a number other documents including, *inter alia*:

- NISA Cable Assessment Area, Schedule of Works
- NISA Cable Assessment Area, Natura Impact Statement

The overall aim of the site investigations is to collect the necessary data and information required to inform the engineering and detailed design of the cable route ashore. The possible installation of a windfarm and associated infrastructure in the area in the future would be the subject of a separate Foreshore Lease / Licence application and is not the subject of this current application.

Four types of surveys are proposed:

- Geophysical Survey (Mutibean Echosounder, Side Scan sonar, Magnetometer, Sub bottom profiler, Seismic sound source)
- Geotechnical Surveys including Boreholes, Cone Penetration Tests (CPTs) and VibroCores (VCs)
- Ecology Surveys – bird, fisheries and marine mammals survey including benthic grab sampling as appropriate
- Archaeological Survey

The proposed site investigation methods are standard and have been used in similar investigations in Irish waters and internationally.

It is intended that the proposed survey works would be phased over a period of 3 years following award of licence.

There are no licenced aquaculture sites within the proposed site investigation area on the Foreshore and therefore impacts on aquaculture are not considered likely.

There is commercial fishing activity within the proposed site investigation area on the Foreshore and therefore some interaction with fishing activity may occur. Considering the scale, timing and duration of the proposed investigations it is considered that that such interaction will be limited and overall, will not be significant. Notwithstanding this, it is noted that the applicant has appointed a Fisheries Liaison Officer who had engaged with the fishing community in the area. It is recommended that the Fisheries Liaison Officer should, on an ongoing basis, engage with the fishing community and other relevant stakeholders and this should be a specific condition on any licence that may be granted.

Submission 5 - Sea Fisheries Protection Authority

From: [redacted], [redacted] <[redacted]@sfpa.ie>
Sent: Wednesday 22 September 2021 10:48
To: [redacted] (Housing) <[redacted]@housing.gov.ie>
Cc: [redacted] <[redacted]@sfpa.ie>
Subject: RE: SFPA-FS007358 Statkraft North Irish Sea Array Cable Route, Site Investigations-Notice of Public Consultation Period

Hello [redacted],

Please find the SFPA response to the application by Statkraft to conduct site investigations North of Dublin.

Kind regards,

[redacted]

[redacted]

Sea Fisheries Protection Authority
Eastern Region
Howth
[redacted]@sfpa.ie
Direct: 087[redacted]

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Sea Fisheries Protection Authority Eastern Region

West Pier,
Howth,
Co. Dublin
[redacted]

Tel: +3531 8321910
Fax: +3531 8321911
Email: sfpahowth@sfpa.ie
Direct: +353 87 [redacted]

Application No:	FS007358	**Applicant Name:**	STATKRAFT
Application Category			
Aquaculture	Foreshore General	Energy	Other
		Wind	
Location	East of Skerries, Co.Dublin	**Species**	
Date	21-9-2021	**SFPA Region**	Eastern

Inspectors comments

Site investigation application for a landfall hook up for the proposed wind farm (NISA Statkraft). 10,623.33 hectares is the applied are where the investigations will take place. Skerries is the main port which falls within the applied area . The documentation refers to fisheries surveys and the all information including the appointed Fisheries Liaison Officer contact details should be sent to myself in advance of any surveys commencing. Results of such surveys also are required to be forwarded to the SFPA Howth office.

1. **Wild Fisheries**

The application falls within commercial fishing grounds for crustaceans and live bivalve molluscs. The operation of the proposed jack up barge should not restrict the SFPA conducting official control duties at sea with the razorclam and inshore potting fleet while the investigations are being carried out.
There is an active razor fleet which operate from Howth, Balbriggan, Skerries and Clogherhead which operate in the applied area.

2. **Shellfish Production Areas**

The applied area within Skerries Classified shellfish production area. The investigations should cause an issue when official shellfish sampling is being conducted. The razor clams are sold for direct human consumption.

3. **Seafood Safety**

There is not expected to be any issues with seafood safety while the investigations are being conducted. The shellfish is sold for direct human consumption and the applicant must notify the SFPA Howth Office immediately should a pollution event during investigations occur.

Howth SFPA contact details are sfpahowth@sfpa.ie attention [redacted] and [redacted], Howth main phone is 01-8321910 and mobile number s 087-[redacted]	
[redacted] Sea Fisheries Protection Officer	Date 21-9-2021

Submission 6 - Marine Survey Office

From: [redacted]
Sent: Tuesday 5 October 2021 17:30
To: [redacted] (Housing) <[redacted]@housing.gov.ie>
Subject: MSO. FS007358.Statkraft NISA Cable Route. Notice of Public Consultation Period.

Good afternoon [redacted],
After careful consideration, the Marine Survey Office has no objection to the above referenced application from a navigational safety perspective. However, the following points shall be of note;

- An appropriate Marine Notice detailing the works and vessels engaged in said works shall be published for the information of all marine users in the sea area covered by the application. Safety notices for mariners shall be promulgated by all available means appropriate during the duration of the subsea cable operations to ensure the safety of navigation is maintained.
- The applicant should seek guidance from the Department of Defense as some of the works are within the Gormanstown Firing Practice Area

Rgds

Capt. [redacted]
Marine Survey Office
Nautical Surveyor

An Roinn Iompair
Department of Transport

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

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**

Louth County Council Planning-FS007358 Statkraft North Irish Sea Array Cable Route, Site Investigations-Notice of Public Consultation Period

Applicant : North Irish Sea Array Windfarm Limited

Details of Foreshore Licence: Application is for site investigation surveys necessary to establish the optimum location for and design of the export cable(s) to shore, and to establish the most appropriate route corridor and landfall location for the export cable(s) from the proposed North Irish Sea Array (NISA) offshore wind farm, located off the coasts of Dublin, Meath and Louth.

The application includes for geophysical surveys (multi-beam echo sounder, sub bottom profiling, side-scan sonar and magnetometer), geotechnical surveys (cone penetration tests and vibrocores along the potential routes and boreholes at the landfalls) and ecological surveys (fisheries surveys, benthic grab samples, intertidal benthic sampling).

Overview

The Department of Housing, Local Government and Heritage has requested comments by email in respect of the application for a foreshore license application off the coasts of Dublin, Meath and Louth.

Comments of Louth County Council – Planning Section

The purpose of the Forseshore licence application is to facilitate site investigation surveys and as such Louth County Council has no objection to same. The mitigation measures outlined in the application documentation should be implemented in full in particular the public consultation and engagement proposals should be implemented in a timely manner.

It is acknowledged at this juncture that it is not proposed to have any landfall within County Louth for the export cables.

It is noted that the Appropriate Assessment does not reference Clogher Head SAC which is located just outside the 15km radius. Having regard to the qualifying interests of this European site and the nature of the works proposed in this application it is not considered that there would be any likely significant effects on this European site in view of its conservation objectives. However, should investigative works be proposed in the future closer to the Louth coastline the effects on this site in combination with other sites should be considered in more detail.

[redacted]

Senior Planner

13th October 2021