North Irish Sea Array Windfarm Limited,
Building 4200,
Cork Airport Business Park,
Co. Cork

26th May 2022

[redacted],
Foreshore Section,
Department of Housing, Local Government and Heritage,
Newtown Road,
Wexford.

Dear [redacted],

RE: FS007358 – FORESHORE LICENCE APPLICATION BY NORTH IRISH SEA ARRAY WINDFARM LIMITED., SITE INVESTIGATION

North Irish Sea Array Windfarm Limited (NISA Ltd.) would like to thank the prescribed bodies for their responses to the consultation under SI 293 of 2021 and welcome the additional submissions made.

The following table summarises the list of the prescribed bodies that responded under the public consultation held under SI 293 of 2021.

Ref	Prescribed Body Consultee
1	Marine Advisor – Department of Housing, Local Government and Heritage – Ecology
2	Marine Advisor – Department of Housing, Local Government and Heritage – Engineering
3	Department of Housing, Local Government and Heritage – Underwater Archaeology and Nature Conservation Units
4	Louth Co. Co.

Submission and Responses

Prescribed Body	Comments	Response
Marine Advisor – Department of Housing, Local Government and Heritage – Ecology	Your email of the 20th of April 2022 refers to this licence application to carry out site investigation works off the coasts of Co. Dublin and Co. Meath. This coastline is of high ecological importance and includes Six Special Protection Areas (SPA) which are nationally and internationally important sites for waterfowl and sea birds. Rockabill SPA [IE004014] supports the most important Roseate Tern colony in Europe, the site also supports nationally important breeding populations of Common Tern and Arctic Tern. Some sites are important for breeding seabird with Skerries Islands SPA [IE004122] having an internationally important population of breeding Cormorants. The Special Area of Conservation (SAC) here support good examples of a number of coastal and marine habitats listed on Annex I of the E.U. Habitats Directive. River Boyne and River Blackwater SAC [IE002299] is important site for populations of two Annex II species listed on of the E.U. Habitats Directive, namely River Lamprey (*Lampetra fluviatilis*) which is present in the lower reaches of the Boyne River, and Otter (*Lutra lutra*) which can be found throughout the site. The Rockabill to Dalkey Island SAC [IE003000] is the only east coast site which designated for Harbour porpoise, it is also designated for the Annex I habitat	NISA Ltd thanks the Marine Advisor for their comments and looks forward to receiving the site specific conditions.

	Reefs of which there are few examples along the east coast. As you will note from my Screening Stage Report Environmental Report of the 18th of February 2022 I agreed with and accepted the outcome of the IEC's review of the environmental reports associated with this application. I have no objection to this application subject to a complete environmental assessment. I will provide site specific conditions once the environmental assessment process is complete.	
Marine Advisor – Department of Housing, Local Government and Heritage – Engineering	My report of the 11/11/2021 remains valid and I have no further comments to add.	No response required
Department of Housing, Local Government and Heritage – Underwater Archaeology	Department of Housing, Local Government and Heritage – Underwater Archaeology Unit had no further comment on the documentation	No response required
Department of Housing, Local Government and Heritage – Nature Conservation Unit	Department of Housing, Local Government and Heritage – Nature Conservation Unit had no further comment on the documentation	No response required
Louth Co. Co.	In relation to your email below Louth County Council would like to make the following observations: "The planning authority (Louth County Council) will rely on the department to consider potential effects on European sites at this location and their in-combination effects on the European sites in view of their conservation objectives and also any protected species as provided for in the Habitats Directive. The Planning Authority is aware that other foreshore licences have been granted for geophysical and geotechnical surveys to be undertaken in these waters. The wider / cumulative	NISA Ltd acknowledges the comments from Louth County Council. NISA Ltd included a screening and subsequent assessment (where deemed appropriate) for effects on the receiving environment when the proposed activities are considered in combination with a number of other projects on the area including other foreshore licences as referred to by Louth County Council. All effects were deemed to be localised (immediate vicinity of the surveys) and/or temporary (during the survey duration). NISA Ltd included as a proposed mitigation measure a commitment to engage with other licence holders should in-combination effects be a possibility with a view to ensuring that effects are minimised.

	impacts on marine habitats, aquatic mammals and birds should be considered in-combination. It is noted that with regards to the information provided in respect of the Roseate Tern, that no geotechnical or benthic site investigation activities will be carried out during the nesting season. However, the table which sets out how timing and duration of surveys does not provide a cross reference to this mitigation. Greater clarity is required in this regard to avoid any ambiguity regarding survey periods should a license be granted."	In relation to the table setting out timing and duration this table is to demonstrate the maximum duration of any activities as opposed to specific time periods and was not intended to reflect proposals for mitigation. NISA Ltd adopted an extremely conservative view in relation to indirect effects on the conservation objectives of the Roseate Tern within the Rockabill SPA and considers that the greatest possibility of significant effects to the Roseate Tern would be during nesting (until chicks are fledged) when the terns forage much closer to the island. Roseate Terns from Rockabill SPA are known to join the tern colony on Dalkey Island after fledging occurs in July (https://www.dlrcoco.ie/sites/default/files/atoms/files/dalkeyternleaflet.pdf).

Yours sincerely,

[redacted]

[redacted]

On behalf of Statkraft Ireland