Response to Public Submissions

Summary:	Summary Response document on Helvick Head Foreshore Licence Application Public Submissions

ESB Wind Development Limited (Ltd), has applied for a foreshore licence to undertake marine site investigations to inform feasibility assessments and design relating to the Helvick Head Offshore Wind project to the south of County Waterford and to the east of County Cork. These site investigation works include Geophysical surveys, Geotechnical surveys, Metocean surveys, Environmental/Ecological and Archaeological surveys.

A public consultation was undertaken as part of the foreshore licensing process between 14th February 2022 and 15th March and four responses were received from the following organisations and individuals:

- Submission 1: Member of the Public
- Submission 2: Dungarvan Bay Charter Boats
- Submission 3: O Donovan Seafoods
- Submission 4: Inshore Fisher

ESB Wind Development Ltd (ESB) welcomes all responses received and addresses each one below either alone or collectively depending on the content of the response.

We would like to highlight that the licence application is for site investigation activities only and any subsequent wind farm development and consenting activities are outside the scope of this application.

1 Responses to Submissions Received

Submission 1: Member of the Public

Submission Comments	ESB Response
I fully support the development of windfarms off the coast of Waterford and elsewhere. They are badly needed to get us off imported non renewables and to insulate us against external forces and events such as wars, etc. The time to act has long passed but now better than more delays, government and government agencies are the ideal entity to invest in securing our energy future.	ESB notes and welcomes the points raised in this submission.

Submission 2: Dungarvan Bay Charter Boats

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
Having examined the site area and reviewed the nature of some of the survey investigations, I contend that the proposed investigations are likely to impede/conflict with my established access routes to fishing marks and indeed many of the fishing marks themselves. E.g. Wreck 51.57 158N 7.23 744; Wreck 51.84 730N 7.58 448W; Wreck51.51. 790N 7.22 830W; Wreck 51 57 720N 7.18 720W. Notwithstanding my contended well justified concerns about the ecological impact of an offshore Windfarm in this location, which will be later elaborated on at later planning stages, even now proposed survey investigations such as seismic scans and seabed borehole survey drilling can precipitate avoidance behaviour among fish species, which in turn can have adverse implications for my business, fishing in the area generally and the future wildlife observations in the area.	ESB is committed to working with all potentially impacted marine users, to include charter boat operators, individual fishers, Fish Producer Organisations and Inshore Fisheries Forums, with the objective of ensuring that survey activities can be completed safely and without significant impact to those that currently operate within the marine space, to include but not be limited to charter boat operators, fishers and their fishing gear, survey equipment and vessels, and any targeted fish and/or crustacean species. All marine users are key stakeholders in any offshore wind farm proposal and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and also in the minimisation of risk to both parties. With reference to the submission comments on impacts from SI activities on fish species, most fish species are not sensitive to noise as they are not able to detect frequencies above 1500hz which the majority of the proposed survey equipment operates above. For low frequency producing noise, including those produced from drilling and UHRS survey equipment, noise may be detected by fish species, however the sound pressure levels that would be detected would likely be low due to noise attenuation through the water column resulting in behavioural effects, such as startle responses, feeding disruption, area avoidance, rather than any physiological effects. The area in which the effects would be observed would also be localised and temporary in duration. On cessation of activities any behavioural effects observed would dissipate over a short period of time.
The subject area is unbelievably rich with cetacean species and you will be aware that these waters form part of an Irish Government declared sanctuary for Whales and Dolphins since 1991. This in turns begs the question as to how such investigative works can be considered amidst such a designation. 60 meter plus depths predominate 12 miles to the southeast of Helvick Head which is also an area where the main dolphin population traverses east/west off the south coast. Fin whales regularly frequent the area.	ESB has assessed the implications of this project, both individually and in combination with other plans and projects, against the conservation objectives of European Sites with marine mammal Qualifying Interests within the Supporting Information: Screening for Appropriate Assessment (SISAA) and Natura Impact Statement (NIS) and have concluded that following application of suitable mitigation measures this project will not adversely affect the integrity of the sites concerned. An Annex IV species risk assessment has also been undertaken for the project to ensure the strict protection of marine Annex IV species.
I note that the applicant contends that their site selection process involved consideration of various stakeholders and marine users who could be impacted by	An Offshore Wind Stakeholder Manager and a Fisheries Liaison Officer (FLO) have been appointed to support the Helvick Head project. Both of these have been actively engaging with the commercial fishing

Submission Comments	ESB Response
site investigation works. Well for the record, I have not been consulted by the applicants to date. I note that the ESB have said that they have appointed liaison officers to address stakeholder concerns. In this regard any consultations which I have had with liaison officers representing other energy providers seeking investigation licensing concerning the same general area have been poor and quite one sided.	industry on a face-to-face basis and also in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project, but to also broaden out that engagement to include other marine interests (e.g., charter and tour boats, aquaculture interests, leisure craft, surfers, etc.) as well as onshore communities. To that end, ESB is currently expanding its staffing resource to specifically support the ongoing stakeholder engagement activities. Commencement of survey activities is subject to Foreshore Licence consent and the availability of surveys vessels, equipment and personnel. Once there is certainty on these factors our objective is to work with all marine users to develop and implement a survey programme which minimises the risk of any potential losses through effective planning and coordination of the survey activities. In addition to the project website, www.helvickheadoffshorewind.ie, in an effort to provide up-to-date information to the public on the project, ESB held a virtual public consultation on Helvick Head Offshore Wind via a virtual consultation room. This room was launched on 31st May for a period of 6 weeks. Advertisements on the virtual consultation were placed in both local and national newspapers – the Waterford News & Star and the Irish Examiner. It is planned that further virtual consultations will take place as the project develops, with interested stakeholders also invited to attend project webinars where they can learn more but also be afforded the opportunity to ask questions directly of the project team. ESB will also reach out to Dungarvan Bay Charter Boats to discuss the project further.

Submission 3: O Donovan Seafoods

ESB notes the points raised in this submission. A response to these comments is provided in the table below.

Submission Comments	ESB Response
The proposed Surveys / Ore development by esb off the south coast will directly affect my coastal and inshore commercial fishing operations based in cork Harbour, this will result in loss of income as well as crew lay- offs. The area of most importants to operations is directly affected. Any survey operations will have to include comprehensive discussions with any affected parties within the fishing industry as well as suitable compensation for any loss of income or fishing opportunity/areas.	ESB is committed to working with individual fishers and also with their representative Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels. Additionally, ESB is developing a Fisheries Engagement and Coexistence Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Helvick Head project throughout the project's lifecycle – from initial assessment, through construction, into operation. Fishers are key stakeholders in any offshore wind farm proposal and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and also in the minimisation of risk to both parties.

Submission 4: Inshore Fisher

ESB notes the points raised in this submission. A response to these comments is provided in the table below.

Submission Comments	ESB Response
My livelihood and importance of the area to Inshore fishing. The area in question is extremely important to me as a inshore sustainable fisherman, using static gear such as pots – nets – lines for catching crab, lobster, shrimp and whitefish. For me nearly (80%) of my shrimp fishery between September and March is located in the Proposed area. And also up to 60% of my lobster and crab fishing done in this area. Also take up to 50% of my whitefish area. I work a 6 meter vessel using only Sustainable and Eco-friendly fishing techniques. Giving the size of my vessel and the nature of traditional fishing activity in the area operating elsewhere in not a realistic or Safe option even for a short time Base Disruption of activity and economic impact. I believe that while talking to Fish Liaison officers (FLO) that while these are only Site investigation works, they will most likely disrupt fishing activity and have a negative economic impact on me and my business and may involve me having to move static gear to avoid damage or loss to it. Previous experience shows this to be the case. I also think the FLOs should be doing more to help fishermen as this will be a long term agenda and I as a fisherman will lose out on catching ability and also fish stocks leaving the area due to all this work.	ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacea stocks. Additionally, ESB is developing a Fisheries Engagement and Coexistence Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Helvick Head project throughout the project's lifecycle – from initial assessment, through construction, into operation. Fishers are key stakeholders in any offshore wind farm proposal and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and also in the minimisation of risk to both parties.