

Addendum to the
Environmental Impact
Assessment Report

NISA
North Irish Sea Array

Volume 3 - Offshore Chapters

Chapter 20

Infrastructure and Other Users



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20. Infrastructure and Other Users

North Irish Sea Array Windfarm Ltd (NISA, hereafter referred to as ‘the Developer’) has been considering the Request for Further Information (RFI) issued by An Bord Pleanála as well as the third party submissions received following public consultation. At An Coimisiún Pleanála’s behest, the Developer has also continued to consult with stakeholders in respect of the 2024 planning application throughout 2024-2026. Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI. Amendments are therefore required to Chapter 20: Infrastructure and Other Users of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2.

For the purposes of clarity, this document shall be read in conjunction with Chapter 20 submitted as part of the 2024 EIAR.

Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR will be clearly labelled as such.

Text in bold is only used throughout this document to indicate where changes are required, and why they are required. Text in italics is text from a section of the 2024 EIAR which is deleted, or quotations from other documents (as explicitly stated). Replacement text is in normal font.

Tables which have been updated from the 2024 EIAR, or entirely new tables, have been included in the Addendum to the EIAR. These can be identified by the “A” prefix in the caption. Any changes within an updated table, in comparison to tables within the 2024 EIAR, are indicated by grey shading in the relevant cell, column or row, as necessary. The exception to this is where a table has changed in its entirety.

The sections relevant to Chapter 20 in the RFI are included below.

RFI Section	RFI	Relevance to Chapter
1 (b)	The scientific information provided as part of the planning application documentation should be based on up-to-date survey reports and data. Accordingly, the applicant is requested to confirm/provide justification/verification that the information submitted in support of the planning application remains relevant and appropriate at the point of submitting further information or to update same as required.	The timeframes associated with the RFI have necessitated a review of the datasets previously used in the 2024 EIAR to ensure any necessary updates to the baseline environment are captured. Any changes to the baseline are captured in Section 20.3.
1 (c)	The applicant is requested to confirm whether any on-going or additional surveying has been carried out since the application was lodged and, if so, the applicant is invited to submit any further survey data results and analysis and update the planning application documentation, as appropriate.	Further intertidal/nearshore geophysical surveys undertaken in 2023 and geophysical surveys undertaken in the array in 2024 have enabled updated analysis of maritime archaeology receptors, in accordance with RFI Section 1 (c).
4	The documentation submitted does not provide specific detail, assessment, or review of the range of ecosystem functions and services which could be impacted by the proposed development. The National Marine Planning Framework (NMPF) states that proposals to 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.	A synopsis report of ecosystem functions and services has been provided in Appendix A3.3 Ecosystem Functions and Services Assessment, which considers the full range of ecosystem services set out in the report ‘Valuing Ireland’s Blue Ecosystem Services (SEMURU of NUI Galway, 2018). The outcome of individual receptor assessments concluded no material impact on ecosystem services, and no impediment to the ability of normal ecosystem functions and services to function, resulting from the proposed development.

RFI Section	RFI	Relevance to Chapter
	<p>Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats.</p> <p>The applicant is requested to update the EIAR to include an assessment of impacts (both positive and negative) on relevant ecosystem functions and services and include mitigation measures, as appropriate. The applicant is also requested to submit a synopsis report of the relevant impacts on ecosystem functions and services. In identifying the relevant ecosystem services for assessment, including those services classified as provisioning, regulation and maintenance, and cultural services, the applicant is advised to consider the full range of ecosystem services set out in the report ‘Valuing Ireland’ s Blue Ecosystem Services’ (SEMRU of NUI Galway, 2018), as referenced in the NMPF. The report should also consider the need for an adaptive management framework for ongoing assessment and should include provision for appropriate monitoring of any mitigation measures and operational management strategies, as well as provision for decommissioning.</p>	<p>The Developer has not included a separate eco-system function assessments in the respective Chapters of the EIAR, as the conclusions of the EIAR are already directly linked to the assessment of ecosystem functions and services. This includes assessment of decommissioning impacts, the need for adaptive management, ongoing monitoring and/or other mitigations.</p>
5	<p>The Board notes that cumulative assessment was addressed under each topic specific chapter in the EIAR and addressed within Chapter 38 Cumulative and Inter related Effects Assessment (CEA) (and associated Appendices 38.1 and 38.2).</p> <p>The Marine Institute in their observation raises concerns in relation to the methodology applied in the submitted cumulative effects assessment and the manner in which the information is presented, noting the lack of a standard Irish methodology in relation to CEA.</p> <p>The applicant is advised that guidance exists in the UK, namely Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK, September 2024 (NSIP, 2024). The applicant is requested to revise the submitted cumulative assessment in line with NSIP (2024) and submit a standalone document to clearly demonstrate the CEA conclusions. In the interests of consistency and transparency, the applicant is requested to complete the assessment in accordance with the templates provided in the NSIP (2024), namely “Appendix 1: Matrix 1 – Identification of ‘other development’ for CEA” and “Appendix 2: Matrix 1 – Assessment matrix” (see attached Appendix B). This assessment should include each of the Irish Sea Phase 1 ORE Projects, namely (Oriel WF (ABP-319799-24), Arklow WF (ABP-319864-24), Codling Wind Park (ABP-320768-24), and Dublin Array WF (ABP-321992-25), and all other relevant projects in the International Council for the Exploration of the Sea (ICES) Celtic Sea and Greater North Sea ecoregions, regardless of project type. It is further requested that the applicant confirm that the now published documentation pertaining to the Irish Sea Phase 1 ORE projects, which have all been submitted to the Board for planning consent since this application was submitted, have been fully incorporated into the cumulative effects assessment.</p>	<p>The Cumulative Effects Assessment has been revised in line with NSIP (2024) and relevant sections of Chapter 11: Marine Water and Sediment Quality have been updated.</p>

RFI Section	RFI	Relevance to Chapter
	<p>In accordance with NSIP (2024) tiered approach, it is requested that the subject proposal and each of the Irish Sea Phase 1 ORE projects be classified under Tier 1 (“Other existing and, or approved development submitted applications under the Planning Acts or other regimes but not yet determined”).</p> <p>The applicant is requested to update the application documentation, where relevant.</p> <p>In the interests of comprehensiveness and for ease of reference, the applicant is strongly encouraged to liaise with the other Irish Sea Phase 1 ORE Project applicants in the preparation of the above assessment and drafting of the tables attached in Appendix B.</p>	
16	<p>There is an existing gas interconnector pipeline located on the seabed between Ireland and Scotland, which is stated in the EIAR to be located c. 400-500m northwest of the array area (Appendix 17.1 Navigational Risk Assessment and Chapter 20). Section 15 of Appendix 17.1 relating to cumulative impacts incorrectly states there are no subsea cables/pipeline within 2nm. The applicant is requested to address the proximity of the existing gas interconnector pipeline to the north of the array area, having regard to NMPF Transmission Policy 5.</p>	<p>This Chapter considers all marine infrastructure that may interact with the Proposed Development, which includes gas interconnector pipelines. The Developer has addressed the request to consider the proximity of the GNI interconnector and has included consideration of the NMPF Transmission Policy within this Chapter.</p>
17 (a)	<p>‘EID1’ is an area of airspace surrounding Gormanston Airfield, utilised by the Irish Defence forces. The applicant is requested to confirm, following consultation with the Irish Air Corps, and having regard to NMPF Defence and Security Policy 1, that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area.</p>	<p>This Chapter considers the use of the marine environment by other users, which includes the Department of Defence. The Developer has addressed the request to consult with the Irish Air Corps and has considered the NMPF Defence and Security Policy 1 within this Chapter.</p>

20.1 Introduction

There are no changes to this section. Refer to Section 20.1 of Chapter 20 of the 2024 EIAR Methodology.

20.2 Methodology

20.2.1 Introduction

There are no changes to this section. Refer to Section 20.2.1 of Chapter 20 of the 2024 EIAR.

20.2.2 Study Area

There are no changes to this section. Refer to Section 20.2.2 of Chapter 20 of the 2024 EIAR.

20.2.3 Relevant Guidance and Policy

The key change to this section is the addition of new policy and guidance documents, in response to RFI Section 1 (b). The following bulleted list in Section 20.2.3 of Chapter 20 of the 2024 EIAR shall be deleted:

- *The Offshore Renewable Energy Development Plan (OREDPA) (DCCAE, 2014);*
- *Draft Offshore Renewable Energy Development Plan II (OREDPA II) (DECC, 2023);*
- *The Convention on the International Regulations for Preventing Collisions at Sea (1972);*
- *The Foreshore and Dumping at Sea (Amendment) Act (2009);*
- *The United Nations Convention on the Law of the Sea (UNCLOS);*

- *The Submarine Telegraph Act (1885); and*
- *The Water Pollution Act (1977)*

And be replaced with:

- The Offshore Renewable Energy Development Plan (OREDPlan) (DCCAE, 2014);
- Draft Offshore Renewable Energy Development Plan II (OREDPlan II) (DECC, 2023);
- The Convention on the International Regulations for Preventing Collisions at Sea (1972);
- The Foreshore and Dumping at Sea (Amendment) Act (2009);
- The United Nations Convention on the Law of the Sea (UNCLOS);
- The Submarine Telegraph Act (1885);
- The Water Pollution Act (1977);
- The Future Framework for Offshore Renewable Energy (DCEE, 2025a);
- The Future Framework 2025 Review (DCEE, 2025a);
- The National Designated Maritime Area Plan (DMAP) (DCEE, 2025b); and
- The Offshore Wind Technical Resource Assessment (DCEE, 2025a).

In response to Section 16 of the RFI, the proximity of the existing gas interconnector IC2 to the north of the array has been addressed with reference to National Marine Planning Framework (NMPF) Transmission Policy 5. This policy has been added to Table A20.1, as indicated by the grey shading. Table A20.1 replaces Table 20.1 in Chapter 20 of the 2024 EIAR. NMPF policies are addressed in their entirety in Appendix A3.1: NMPF Compliance Report.

Table A20.1 Key NMPF policies relevant to the assessment (replaces Table 20.1 of Chapter 20 of the 2024 EIAR)

Policy Name	Policy Description	Where addressed
National Marine Planning Framework (2021)	<p>Defence and Security Policy 1</p> <p>Any proposal that has the potential to interfere with the performance by the Defence Forces of their security and non-security related tasks must be subject to consultation with the Defence Organisation. Proposals should only be supported where, having consulted with the Defence Organisation, they are satisfied that it will not result in unacceptable interference with the performance by the Defence Forces of their security and non-security related tasks.</p>	Defence and security are discussed in Section 20.5.2.5, 20.5.3.5 and 20.5.45 and in Chapter 19.
	<p>Petroleum Policy 2</p> <p>Proposals potentially affecting future potential activity in areas subject to existing petroleum authorisations should avoid sterilisation for future petroleum-related activity consistent with Government policy.</p>	Existing oil and gas infrastructure and future activity is discussed in Section 20.3.2.9, within the assessment in Section 20.5 and the cumulative assessment in Section 20.9.
	<p>ORE Policy 8</p> <p>Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required.</p>	Existing cables are discussed in Section 20.3.2.3, within the assessment in Section 20.5 and the cumulative assessment in Section 20.9.

Policy Name	Policy Description	Where addressed
	<p>Transmission 5</p> <p>Proposals for construction or operation activities within one nautical mile of either of the two existing natural gas interconnector pipelines shall be avoided.</p> <p>If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered.</p> <p>If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures be put in place or the proposed activities altered.</p>	<p>Existing interconnector pipelines are discussed in Section 20.3.2.3, within the assessment in Section 20.5 and the cumulative assessment in Section 20.9.</p>
	<p>Safety at Sea Policy 1</p> <p>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.</p>	<p>Recreational vessels are discussed in Section 20.3.2.7, within the assessment in Section 20.5 and the cumulative assessment in Section 20.9.</p>
	<p>Safety at Sea Policy 3</p> <p>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.</p>	<p>Consultation with CIL is discussed in Appendix 1.2. Safety at sea is considered in Chapter 17: Shipping and Navigation.</p>
	<p>Safety at Sea Policy 4</p> <p>Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights (CIL).</p>	<p>Consultation with CIL is discussed in Appendix 1.2. Safety at sea is considered in Chapter 17: Shipping and Navigation.</p>
	<p>Safety at Sea Policy 5</p> <p>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.</p>	
	<p>Sport and Recreation Policy 2</p> <p>Proposals should demonstrate the following in relation to potential impact on recreation and tourism: the extent to which the proposal is likely to adversely impact sports clubs and other recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure; the extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety; and the extent to which the proposal is likely to adversely impact on the natural environment.</p>	<p>Marine recreational activities are considered in Section 20.3.2.7, within the assessment in Section 20.5 and the cumulative assessment in Section 20.9.</p> <p>Impacts on tourism are considered in Chapter 33.</p>

In Section 4 of the RFI, An Bord Pleanála requested the Developer to update the EIAR to include an assessment of impacts (both positive and negative) on ecosystem functions and services. The following text should be added to this section:

Marine ecosystem functions and services are considered within this chapter. The NMPF (2024) sets out the framework and proposed approach to managing Ireland’s maritime activities to ensure the sustainable use of marine resources up to 2040. Environmental policies in the NMPF have been split into nine categories largely aligned to the Marine Strategy Framework Directive (MSFD) Good Environmental Status (GES) descriptors as well as addressing air quality and climate change.

In particular, the Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats.

The conclusions of this Chapter are directly linked to the assessment of ecosystem functions and services. Refer to Ecosystem Functions and Services Assessment (Appendix A3.3) which provides the link between MSFD, the Overarching Marine Planning Policy (OMPP) and EIAR topics.

There are no further changes to this section. Refer to 20.2.3 of Chapter 20 of the 2024 EIAR.

20.2.4 Data Collection and Collation

There are no changes to this section. Refer to Section 20.2.4 of Chapter 20 of the 2024 EIAR.

20.2.5 Methodology for Assessment of Effects

There are no changes to this section. Refer to Section 20.2.5 of Chapter 20 of the 2024 EIAR.

20.2.5.1 Sensitivity Criteria

There are no changes to this section. Refer to Section 20.2.5.1 of Chapter 20 of the 2024 EIAR.

20.2.5.2 Magnitude of Impact criteria

There are no changes to this section. Refer to Section 20.2.5.2 of Chapter 20 of the 2024 EIAR.

20.2.5.3 Determining the Significance of Effect

There are no changes to this section. Refer to Section 20.2.5.2 of Chapter 20 of the 2024 EIAR.

20.3 Baseline Environment

20.3.1 Introduction

There are no changes to this section. Refer to Section 20.3.1 of Chapter 20 of the 2024 EIAR.

20.3.2 Receiving Environment

There are no changes to this section. Refer to Section 20.3.2 of Chapter 20 of the 2024 EIAR.

20.3.2.1 Subsurface Structures

There are no changes to this section. Refer to Section 20.3.2.1 of Chapter 20 of the 2024 EIAR.

20.3.2.2 Buoys and Mooring (Non-Navigational)

There are no changes to this section. Refer to Section 20.3.2.2 of Chapter 20 of the 2024 EIAR.

20.3.2.3 Subsea Cables and Pipelines

There are no changes to this section. Refer to Section 20.3.2.3 of Chapter 20 of the 2024 EIAR

20.3.2.4 Dredging and DaS Sites

There are no changes to this section. Refer to Section 20.3.2.4 of Chapter 20 of the 2024 EIAR

20.3.2.5 Defence and Security

There are no changes to this section. Refer to Section 20.3.2.5 of Chapter 20 of the 2024 EIAR

20.3.2.6 Other Marine Renewable Energy Projects

There are no changes to this section. Refer to Section 20.3.2.6 of Chapter 20 of the 2024 EIAR

20.3.2.7 Marine Recreational Activities

As a result of reviewing up-to-date marine recreational activities in response to Section 1 (b) of the RFI, an update to this section is required where it refers to the target species of fish caught by recreational anglers. The third paragraph under the title ‘Angling’ shall be deleted:

Key target species for recreational anglers are Atlantic mackerel (Scomber scombrus), sandeel (Ammodytes tobianus), Atlantic herring (Clupea harengus) and European sprat (Sprattus sprattus).

And be replaced with:

Key target species for recreational anglers are cod (*Gadus morhua*), ray (*Raja clavata*), whiting (*Merlangius merlangus*), tope (*Galeorhinus galeus*), spurdog (*Squalus acanthias*), pollack (*Pollachius pollachius*), mackerel (*Scomber scombrus*), coalfish (*Pollachius virens*), dabs (*Limanda limanda*), bullhuss (*Scyliorhinus stellaris*), cuckoo ray (*Leucoraja naevus*) and smooth hound (*Mustelus mustelus*).

There are no other changes to this section. Refer to 20.3.2.7 of Chapter 20 of the 2024 EIAR.

20.3.2.8 Water Treatment and Disposal

There are no changes to this section. Refer to Section 20.3.2.8 of Chapter 20 of the 2024 EIAR.

20.3.2.9 Other Resource Activities

There are no changes to this section. Refer to Section 20.3.2.9 of Chapter 20 of the 2024 EIAR.

20.4 Characteristics of the Proposed Development

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2. In the 2024 EIAR, Wind Turbine Generator (WTG) monopile foundations and Offshore Substation Platform (OSP) monopile and jacket foundations with pin piles were considered. Following design refinement in response to the RFI, monopiles have been removed and WTGs are now proposed with Suction Bucket Jacket (SBJ) foundations, and OSPs with jacket foundations installed with either drilled pin piles or suction buckets, as indicated by the grey shading in Table A13.5 below (further information is provided in Appendix A5.1). Therefore, Table 20.8 of Chapter 20 of the 2024 EIAR shall be deleted and replaced with Table A20.2:

Table A20.2 Key characteristics of Project Option 1 and Project Option 2 (replaces Table 20.8 of Chapter 20 of the 2024 EIAR)

Key Offshore Characteristics	Project Option 1	Project Option 2
Array area	88.5km ²	88.5km ²
ECC	36.45km ²	36.45km ²
Landfall	One landfall site, immediately south of Bremore Point, which includes two subtidal exit pits within the ECC	One landfall site, immediately south of Bremore Point, which includes two subtidal exit pits within the ECC
Wind Turbine Generator (WTG)	49 WTGs with 250m rotor diameter	35 WTGs with 276m rotor diameter

Key Offshore Characteristics	Project Option 1	Project Option 2
WTG Foundations	49 SBJs of 18m diameter requiring seabed preparation	35 SBJs of 18m diameter requiring seabed preparation
Offshore Substation Platform (OSP) Foundations (array area)	One OSP supported on a multi-leg jacket foundation (four leg configuration) founded on SBJs or drilled pin piles	One OSP supported on a multi-leg jacket foundation (four leg configuration) founded on SBJs or drilled pin piles
Cables	Installation of 111km of array cables within the array area and installation of two 18km export cables within the ECC	Installation of 91km of array cables within the array area and installation of two 18km export cables within the ECC

20.4.1 There are no other changes to this section. Refer to 20.4 of Chapter 20 in the 2024 EIAR. Parameters for Assessment

There are no changes to this section. Refer to Section 20.4.1 of Chapter 20 of the 2024 EIAR.

20.4.1.1 Construction

There are no changes to this section. Refer to Section 20.4.1.1 of Chapter 20 of the 2024 EIAR.

20.4.1.2 Operation Phase

There are no changes to this section. Refer to Section 20.4.1.2 of Chapter 20 of the 2024 EIAR.

20.4.1.3 Decommissioning Phase

There are no changes to this section. Refer to Section 20.4.1.3 of Chapter 20 of the 2024 EIAR.

20.4.2 Embedded Mitigation Measures

The changes to this section are a result of consultations with Marine Survey Office (MSO) and the commitment by the Developer to maintain the Structural Exclusion Zone to a minimum 3.06nm. Therefore, the only change in this section is to Table 20.9 from Chapter 20 of the 2024 EIAR, and the addition of the 3.06nm separation, as indicated by the grey shading within the “Structure Exclusion Zone” row. For the purposes of clarity, Table 20.9 of Chapter 20 of the 2024 EIAR shall be replaced with Table A20.3 below:

Table A20.3 Embedded mitigation measures relating to I&OU (replaces Table 20.9 of Chapter 20 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Pre-construction surveys	Pre-construction surveys will be carried out that involve geophysical and magnetometer surveys used to identify existing assets. This may include out of service cables located in a different area to their chartered location due to outdated location techniques, which will reduce the risk of direct impacts or damage to subsea cables and pipelines during construction.
Structure Exclusion Zone	As part of managing potential impacts to shipping and navigation, the proposed development has incorporated a Structure Exclusion Zone, into the design. This is an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advisory safety zones	Advisory safety zones of up to 500m around infrastructure under construction will be communicated during construction. Where appropriate, guard vessels and/or guard buoys will also be used to ensure adherence to advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction.

Measure	Mitigation detail
	An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.
Advanced vessel warnings	<p>Details of the proposed development will be promulgated in advance of construction, via Notice to Mariners (NtM) to ensure mariners are aware of the planned works.</p> <p>This information will include associated advisory safety zones and advisory passing distances.</p>
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies for the updating of nautical and electronic charts.
<p>Consultation with the Department of Defence (DoD)</p> <p>Adherence to DoD NtMs and/or Marine Notices</p>	Prior to installation of the export cable, engagement will be undertaken with the DoD and adherence of NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with Irish Air Corps (IAC) firing range activities.
Cable burial and cable protection measures	<p>Exposed and/or inappropriately managed cables may potentially impact on vessels looking to anchor within proximity to the offshore development area.</p> <p>Export and inter-array cables will be buried where practicable to ensure they are not exposed by sediment movements (Section 8.3.10 in the Offshore Construction Strategy). Where cables cannot be buried, additional cable protection measures such as rock placement or mattressing will be applied to achieve adequate cable protection. Up to 20% of cable length is expected to need protection either during initial installation, or throughout the operational phase of the proposed development (see the Offshore Construction Strategy).</p> <p>Cable specification and installation measures will be determined pre-construction and will be included within a detailed Cable Burial Risk Assessment (CBRA), to enable informed judgements regarding burial depth to increase the likelihood of cables remaining buried whilst limiting the amount of sediment disturbance to that which is necessary. This sets out appropriate cable burial depth in accordance with industry good practice, reducing the risk of cable exposure.</p> <p>During construction, sections of export cable might be left exposed whilst awaiting a suitable method of installation. A temporary exclusion zone may therefore be required until the cable can be buried.</p>
Vessel route management	<p>Indicative transit corridors (vessel routing to and from construction sites and ports) will be define in advance of the construction phase, in consultation with the MSO. A vessel management plan (VMP) will be implemented and will include a code of conduct for vessel operators. These measures will reduce the risk of disturbance and displacement of with infrastructure and other users.</p> <p>The VMP is provided in Appendix A17.2 and will be updated through the phases of the proposed development.</p>
Marine pollution contingency measures – chemical risk review	Marine pollution contingency measures will be implemented as part of Appendix A6.1: Offshore Environmental Management Plan (EMP; hereafter Offshore EMP) to manage the risk of accidental spillages from construction equipment or collision incidents. This includes a chemical risk review with information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance. This measure will reduce the likelihood of potentially harmful pollutants to be released into the marine environment which may then impact on fish and shellfish receptors.
Operation	
Structure Exclusion Zone	The proposed development design has incorporated a Structure Exclusion Zone, an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advanced vessel warnings	<p>Details of the proposed development will be promulgated in advance of any work that is not routine during operation via NtM to ensure mariners are aware of the planned works.</p> <p>This information will include associated advisory safety zones and advisory passing distances.</p>

Measure	Mitigation detail
Advisory safety zones	<p>Advisory safety zones of up to 500m around the relevant infrastructure will be communicated during substantial maintenance activities (such as major component replacement). Where appropriate, guard vessels and/or guard buoys will also be used to ensure adherence with advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, maintenance and decommissioning phases. Such risks may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards.</p> <p>An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.</p>
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies as/if required for the updating of nautical and electronic charts.
Consultation with the DoD Adherence to DoD issued NtMs and/or Marine Notices	Prior to management or repair of the offshore export cable, engagement will be undertaken with the DoD and adherence of NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with IAC firing range activities.
Decommissioning	
Structure Exclusion Zone	The proposed development incorporated a Structure Exclusion Zone, an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advanced vessel warnings	<p>Details of the proposed development will be promulgated in advance of decommissioning via NtM to ensure mariners are aware of the planned works.</p> <p>This information will include associated advisory safety zones and advisory passing distances.</p>
Advisory safety zones	<p>Advisory safety zones of up to 500m around the relevant infrastructure will be communicated during decommissioning. Where appropriate, guard vessels and/or guard buoys will also be used to ensure adherence with advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during decommissioning. Such impacts may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards.</p> <p>An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.</p>
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies for the updating of nautical and electronic charts.
Consultation with the DoD Adherence to DoD issued NtMs and/or Marine Notices	Prior to decommissioning of the offshore export cable, engagement will be undertaken with the DoD and adherence of NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with IAC firing range activities.
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to infrastructure and other users from the proposed decommissioning activities should be undertaken, taking into account the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured would be captured within the decommissioning strategy within the Offshore EMP. Any licences or authorisations that might be required would be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no other changes to this section. Refer to Section 20.4.2 of Chapter 20 in the 2024 EIAR.

20.4.3 Potential Impacts

The changes required to this section are due to the change of foundation type from monopiles and jackets with pin piles to SBJ foundation. Therefore, the only change in this section is to Table 20.10 from Chapter 20 of the 2024 EIAR, as indicated by the grey shading on text and within table cells. For the purposes of clarity, Table 20.10 of Chapter 20 of the 2024 EIAR shall be replaced with Table A20.4 below.

Table A20.4 Potential impact and magnitude of impact per project option. The project option that has the greatest magnitude of impact is identified in blue (replaces Table 20.10 of Chapter 20 of the 2024 EIAR)

Potential Impacts	Project Option 1 (49 WTG)	Project Option 2 (35 WTG)	Rationale for the project option with the greatest magnitude of impact
Construction			
Impact 1: Direct displacement or access impacts on subsea cables and pipelines associated with increased vessel movements and the use of advisory safety zones	No. of WTG: 49 Advisory construction safety zones: 500m Number of export cable circuits: 2 Cable crossing technique: Rock berms/mattressing Cable burial depth: 1-3m	No. of WTG: 35 Advisory construction safety zones: 500m Number of export cable circuits: 2 Cable crossing technique: Rock berms/mattressing Cable burial depth: 1-3m	Project Option 1 represents the greatest magnitude of impact Project Option 1 represents the largest duration and extent of exclusion throughout the construction phase due to the larger number of WTGs and hence the greatest potential for displacement of activities associated with subsea cables and pipelines and is therefore the project option with the greatest magnitude of impact.
Impact 2: Disturbance and damage impacts on subsea cables and pipelines assets and infrastructure from construction activities and vessels			
Impact 3: Direct displacement or access impacts on marine recreational activities from increased vessel movements and the use of advisory safety zones	No. of WTG: 49 Maximum number of vessels simultaneously onsite during construction: 50	No. of WTG: 35 Maximum number of vessels simultaneously onsite during construction: 47	Project Option 1 is the project option with the greatest magnitude of impact. Project Option 1 represents the largest duration for underwater noise impacts and extent of exclusion throughout the construction phase due to the larger number of turbines and hence the greatest potential for displacement and/or disturbance to recreational activities.
Impact 4: Indirect disturbance or displacement impacts on marine recreational activities from construction activities (causing increased sediment dispersion and/or noise impacts, and/or impacts to fish species)	Return trips: 3,032 Offshore construction duration: 3 years Advisory safety zone of 500m around infrastructure and construction areas Construction buoys: 10	Return trips: 2,504 Offshore construction duration: 3 years Advisory safety zone of 500m around infrastructure and construction areas Construction buoys: 10	
Operation			
Impact 6: Direct displacement or access impacts on subsea cables and pipelines from increased vessel movements and the use of advisory safety zones	Advisory safety zones: 50m advisory safety zones around manned offshore platforms and temporary 500m advisory safety zones around turbines and offshore platforms undergoing major maintenance Operational duration: 35 years Cable burial depth: 1-3m	Advisory safety zones: 50m advisory safety zones around manned offshore platforms and temporary 500m advisory safety zones around turbines and offshore platforms undergoing major maintenance Operational duration: 35 years Cable burial depth: 1-3m	Project Option 1 is the project option with the greatest magnitude of impact. Project Option 1 represents the largest physical presence and the option with greater maintenance requirements that may restrict activities associated with existing cables.
Impact 7: Direct disturbance and damage impacts on subsea cables and pipelines assets and infrastructure from operational activities and vessels			
Impact 8: Direct displacement or access impacts on marine recreational activities from increased vessel movements, infrastructure (e.g. WTGs) and the use of advisory safety zones	No. of WTG: 49 No. of OSPs: 1 Advisory Safety Zones: 50m advisory safety zones around manned offshore	No. of WTGs: 35 No. of OSPs: 1 Advisory Safety Zones: 50m advisory safety zones around manned offshore	Project Option 1 is the project option with the greatest magnitude of impact. Project Option 1 represents the largest physical presence and the option with greater maintenance requirements that

Potential Impacts	Project Option 1 (49 WTG)	Project Option 2 (35 WTG)	Rationale for the project option with the greatest magnitude of impact
Impact 9: Indirect activity impacts on marine recreational activities from the physical presence of infrastructure (e.g. WTGs)	platforms and temporary 500m advisory safety zones around turbines and offshore platforms undergoing major maintenance. Operational duration: 35 years	platforms and temporary 500m advisory safety zones around turbines and offshore platforms undergoing major maintenance. Operational duration: 35 years	may restrict activities associated with recreational activities.
Impact 10: Indirect disturbance impact on defence and security from repair and maintenance activities within the ECC	No. of cables: 2 Total length of ECC: 18km Operational duration: 35 years	No. of cables: 2 Total length of ECC: 18km Operational duration: 35 years	Project Option 1 and Project Option 2 have the same magnitude of impact. Project Option 1 and Project Option 2 have the same physical presence and the same maintenance requirements that may restrict defence activities.
Decommissioning			
Impact 11: Direct displacement or access impacts on subsea cables and pipelines from increased vessel movements and the use of advisory safety zones	The decommissioning policy for the proposed development infrastructure is not yet defined however it is anticipated that structures above the seabed would be removed.	The decommissioning policy for the proposed development infrastructure is not yet defined however it is anticipated that structures above the seabed would be removed.	Project Option 1 is the project option with the greatest magnitude of impact. Project Option 1 represents the largest duration and extent of exclusion throughout the decommissioning phase and hence the greatest potential for displacement. The removal of cables is considered, however the necessity to remove cables will be reviewed at the time of decommissioning.
Impact 12: Direct disturbance and damage impacts on subsea cables and pipelines assets and infrastructure from decommissioning activities and vessels	The following infrastructure is likely be removed reused, or recycled where practicable: WTG s and SBJs; and OSP including topsides and SBJs	The following infrastructure is likely be removed reused, or recycled where practicable: WTGs and SBJ and OSP including topsides and SBJs	
Impact 13: Direct displacement or access impacts on marine recreational activities from increased vessel movements and the use of advisory safety zones	The following infrastructure is likely to be decommissioned and could be left in situ depending on available information at the time of decommissioning:	The following infrastructure is likely to be decommissioned and could be left in situ depending on available information at the time of decommissioning:	Project Option 1 is the project option with the greatest magnitude of impact. Project Option 1 represents the largest duration for underwater noise impacts and extent of exclusion throughout the construction phase and hence the greatest potential for displacement and/or disturbance to recreational activities.
Impact 14: Indirect disturbance or displacement impacts on marine recreational activities from decommissioning activities (causing increased sediment dispersion and/or noise impacts and/or impacts to fish species)	<ul style="list-style-type: none"> • Inter-array cables; • Scour protection; and • Cable protection 	<ul style="list-style-type: none"> • Inter-array cables; • Scour protection; and • Cable protection. 	
Impact 15: Indirect disturbance impacts on defence and security from decommissioning within the ECC	In the absence of detailed methodologies and schedules, decommissioning works and associated implications for I&OU are considered analogous with those assessed for the construction phase.	In the absence of detailed methodologies and schedules, decommissioning works and associated implications for I&OU are considered analogous with those assessed for the construction phase.	

There are no other changes to this section. Refer to 20.4.3 of Chapter 20 of the 2024 EIAR.

20.5 Potential Effects

There are no changes to this section. Refer to Section 20.5 of Chapter 20 of the 2024 EIAR.

20.5.1 Do-Nothing Scenario

There are no changes to this section. Refer to Section 20.5.1 of Chapter 20 of the 2024 EIAR.

20.5.2 Construction Phase

There are no changes to this section. Refer to Section 20.5.2 of Chapter 20 of the 2024 EIAR.

20.5.2.1 *Impact 1 – Direct Displacement or Access Impacts on Subsea Cables and Pipelines Associated with Increased Vessel Movements and the use of Advisory Safety Zones*

In response to Section 16 of the RFI and following consultation with GNI, it is confirmed that the Scotland–Ireland Interconnector IC2 gas pipeline is located 520m (0.28 nm) from the offshore development area and 949m (0.51nm) /880m (0.48nm) from the nearest WTG in Project Option 1 and Project Option 2 respectively.

In accordance with NMPF Transmission Policy 5 the Developer has consulted with GNI and has completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which has been shared with GNI in January 2026 which proposes appropriate mitigation measures to conclude that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology.

Further details of this consultation are provided in Appendix A1.2.

The first paragraph of ‘Sensitivity of the Receptor’ shall be deleted:

Although there are a total of six cables and pipelines within the study area, including the Scotland-Ireland Interconnector IC2 (which is within 0.5km of the closest point of the offshore development area), there will be no physical overlap of the proposed development with any cables or pipelines belonging to other users (Figure 20.2).

And be replaced with:

Although there are a total of six cables and pipelines within the study area, including the Scotland-Ireland Interconnector IC2 (which is 520m (0.28nm) from the closest point of the offshore development area and 949m (0.51nm) /880m (0.48nm) from the nearest WTG in Project Option 1 and Project Option 2 respectively), there will be no physical overlap of the proposed development with any cables or pipelines belonging to other users (Figure 20.2).

There are no other changes to this section. Refer to 20.5.2.1 of Chapter 20 of the 2024 EIAR. For clarity, the significance of effect remains unchanged from the 2024 EIAR; the direct displacement or access impacts on subsea cables and pipelines associated with increased vessel movements and the use of Advisory Safety Zones could result in a slight effect, which is not significant in EIA terms.

20.5.2.2 *Impact 2 – Disturbance and Damage Impacts on Subsea Cable and Pipeline Assets and Infrastructure from Construction Activities and Vessels*

There are no changes to this section. Refer to Section 20.5.2.2 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged as in the 2024 EIAR. Disturbance and damage impacts on subsea cable and pipeline assets and infrastructure from construction activities and vessels could result in a slight effect, which is not significant in EIA terms.

20.5.2.3 *Impact 3 – Direct Displacement or Access Impacts on Marine Recreational Activities from Increased Vessel Movements and the use of Advisory Safety Zones*

The key change to this section is a very slight increase in the total number of return trips during construction (was 3,008, now 3,032) and a very slight increase in the maximum number of vessels simultaneously onsite during construction (was 49, now 50) compared to the 2024 EIAR.

This change in vessel numbers and vessel trips makes no change to the resulting magnitude or significance assessment, and thus the significance of effect remains unchanged.

Therefore, there are no changes to this section. Refer to Section 20.5.2.3 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged as in the 2024 EIAR; direct displacement or access impacts on marine recreational activities from increased vessel movements and the use of Advisory Safety Zones could result in a slight effect, which is not significant in EIA terms.

20.5.2.4 Impact 4 - Indirect Disturbance or Displacement Impacts on Marine Recreational Activities from Construction Activities (Causing Increased Sediment Dispersion and/or Noise Impacts, and/or Impacts to Fish Species)

The key change to this section is a very slight increase in the total number of return trips during construction (was 3,008, now 3,032) and a very slight increase in the maximum number of vessels simultaneously onsite during construction (was 49, now 50) compared to the 2024 EIAR.

This change in vessel numbers and vessel trips makes no change to the resulting magnitude or significance assessment, and thus the significance of effect remains unchanged.

Therefore, there are no changes to this section. Refer to Section 20.5.2.4 of Chapter 20 of the 2024 EIAR.

Indirect disturbance or displacement impacts on marine recreational activities from construction activities could result in a slight effect, which is not significant in EIA terms.

20.5.2.5 Impact 5 - Indirect Disturbance Impacts on Defence and Security from Construction Activities Within the ECC

As requested by An Bord Pleanála in Section 17 (a) of the RFI and in accordance with NMPF Defence and Security Policy 1, further consultation with the Department of Defence (DoD) was undertaken in June 2025. During this consultation DoD acknowledged that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area. Full details of this consultation is provided in Appendix A1.2.

The key change to this section is a very slight increase in the total number of return trips during construction (was 3,008, now 3,032) and a very slight increase in the maximum number of vessels simultaneously onsite during construction (was 49, now 50) compared to the 2024 EIAR.

This change in vessel numbers and vessel trips makes no change to the resulting magnitude or significance assessment, and thus the significance of effect remains unchanged.

The Developer can confirm that the impact on defence and security receptors remains the same as in the 2024 EIAR.

There are no other changes to this section. Refer to Section 20.5.2.5 of Chapter 20 of the 2024 EIAR. Therefore, the significance of effect remains unchanged from the 2024 EIAR and indirect disturbance impacts on defence and security from construction activities within the ECC will result in a not significant level of effect, which is not significant in EIA terms.

20.5.3 Operational Phase

20.5.3.1 Impact 6 - Direct Displacement or Access Impacts on Subsea Cables and Pipelines from Increased Vessel Movements and the use of Advisory Safety Zones

In response to Section 16 of the RFI and following consultation with GNI, it is confirmed that the Scotland–Ireland Interconnector IC2 gas pipeline is located 520m (0.28 nm) from the offshore development area and 949m (0.51nm) /880m (0.48nm) from the nearest WTG in Project Option 1 and 2 respectively.

In accordance with NMPF Transmission Policy 5 the Developer has consulted with GNI and has completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which has been shared with GNI in January 2026 which proposes appropriate mitigation measures to concludes that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology.

Full details of this consultation is provided in Appendix A1.2. The second paragraph of ‘Sensitivity of the Receptor’ shall be deleted:

Increased vessel movements and the use of advisory safety zones can restrict the access to subsea cables and pipelines, which could cause obstruction or delay to operators if the existing infrastructure requires maintenance or repair. Although there are a total of six cables and pipelines within the study area including the Scotland-Ireland Interconnector IC2 (which is within 0.5km of the closest point of the proposed development), there will be no physical overlap of the proposed development with any cables or pipelines belonging to other users. The subsea cables and pipelines are deemed to be of low vulnerability, high recoverability, and high value and therefore the sensitivity of the receptor is therefore deemed to be medium.

And be replaced with:

Increased vessel movements and the use of advisory safety zones can restrict the access to subsea cables and pipelines, which could cause obstruction or delay to operators if the existing infrastructure requires maintenance or repair. Although there are a total of six cables and pipelines within the study area including the Scotland-Ireland Interconnector IC2, which is 520m (0.28nm) from the closest point of the proposed development, there will be no physical overlap of the proposed development with any cables or pipelines belonging to other users. The subsea cables and pipelines are deemed to be of low vulnerability, high recoverability, and high value and therefore the sensitivity of the receptor is therefore deemed to be medium

There are no other changes to this section. Refer to 20.5.3.1 of Chapter 20 of the 2024 EIAR. For clarity, the significance of effect remains unchanged from the 2024 EIAR; The medium sensitivity and low magnitude of the impact on subsea cable and pipeline receptors could result in a slight effect, which is not significant in EIA terms.

20.5.3.2 Impact 7 - Direct Disturbance and Damage Impacts on Subsea Cable and Pipeline Assets and Infrastructure from Operational Activities and Vessels

There are no changes to this section. Refer to Section 20.5.3.2 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. Direct disturbance and damage impacts on subsea cable and pipeline assets and infrastructure from operational activities and vessels could result in a slight effect, which is not significant in EIA terms.

20.5.3.3 Impact 8 - Direct Displacement or Access Impacts on Marine Recreational Activities from Increased Vessel Movements, Infrastructure (E.G. WTGs) and the use of Advisory Safety Zones

There are no changes to this section. Refer to Section 20.5.3.3 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. The low sensitivity and low magnitude of the impact on marine recreational activities could result in a slight effect, which is not significant in EIA terms.

20.5.3.4 Impact 9 - Indirect Activity Impacts on Marine Recreational Activities from the Physical Presence of Infrastructure (e.g. WTGs)

There are no changes to this section. Refer to Section 20.5.3.4 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. Indirect activity impacts on marine recreational activities from the physical presence of infrastructure could result in a slight effect, which is not significant in EIA terms.

20.5.3.5 Impact 10 - Indirect Disturbance Impacts on Defence and Security from Repair and Maintenance Activities within the ECC

As requested by ACP in Section 17 (a) of the RFI, further consultation with the Department of Defence has been undertaken in June 2025. During this consultation DoD acknowledged that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area. The Developer can confirm that the impact on defence and security receptors remains the same as the 2024 EIAR. Indirect disturbance impacts on defence and security from repair

and maintenance activities within the ECC, will result in a not significant level of effect, which is not significant in EIA terms.

There are no other changes to this section. Refer to Section 20.5.3.5 of Chapter 20 of the 2024 EIAR.

20.5.4 Decommissioning

20.5.4.1 *Impact 11 - Direct Displacement or Access Impacts on Subsea Cables and Pipelines from Increased Vessel Movements and the use of Advisory Safety Zones*

There are no changes to this section. Refer to Section 20.5.4.1 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. direct displacement or access impacts on subsea cables and pipelines from increased vessel movements and the use of Advisory Safety Zones could result in a slight effect, which is not significant in EIA terms.

20.5.4.2 *Impact 12 - Direct Disturbance and Damage Impacts on Subsea Cable and Pipeline Assets and Infrastructure from Decommissioning Activities*

There are no changes to this section. Refer to Section 20.5.4.2 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. direct disturbance and damage impacts on subsea cable and pipeline assets and infrastructure from decommissioning activities could result in a slight effect, which is not significant in EIA terms.

20.5.4.3 *Impact 13 - Direct Displacement or Access Impacts on Marine Recreational Activities from Increased Vessel Movements and the use of Advisory Safety Zones*

There are no changes to this section. Refer to Section 20.5.4.3 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged from the 2024 EIAR. Direct displacement or access impacts of marine activities from increased vessel movements and the use of Advisory Safety Zones could result in a slight effect, which is not significant in EIA terms.

20.5.4.4 *Impact 14 - Indirect Disturbance or Displacement Impacts on Marine Recreational Activities from Decommissioning Activities (Causing Increased Sediment Dispersion and/or Noise Impacts and/or Impacts to Fish Species)*

There are no changes to this section. Refer to Section 20.5.4.4 of Chapter 20 of the 2024 EIAR.

For clarity, the significance of effect remains unchanged. Indirect disturbance or displacement impacts on marine recreational activities from decommissioning activities could result in a slight effect, which is not significant in EIA terms.

20.5.4.5 *Impact 15 - Indirect Disturbance Impacts on Defence and Security from Decommissioning within the ECC*

As requested by An Bord Pleanála in Section 17 (a) of the RFI, further consultation with the DoD has been undertaken in June 2025. During this consultation DoD acknowledged that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area. Full details of all consultations can be seen in Appendix A1.2.

In the review of Chapter 20, an error has been noted in the text reporting the significance of effect. Therefore the paragraph under Significance of Effect will be deleted:

“Overall, it is predicted that the sensitivity of defence and security receptors for Project Option 1 and Project Option 2 is high and the magnitude of the impact is negligible. The high sensitivity and medium magnitude of the impact on defence and security receptors during decommissioning result in a not significant level of effect, which is not significant in EIA terms.”

And be replaced with:

Overall, it is predicted that the sensitivity of defence and security receptors for Project Option 1 and Project Option 2 is high and the magnitude of the impact is negligible. The high sensitivity and negligible magnitude of the impact on defence and security receptors during decommissioning result in a not significant level of effect, which is not significant in EIA terms.

There are no other changes to this section. Refer to Section 20.5.4.5 of Chapter 20 of the 2024 EIAR.

20.6 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 20.6 of Chapter 20 of the 2024

20.7 EIAR Residual Effects

There are no changes to this section. Refer to Section 20.7 of Chapter 20 of the 2024 EIAR.

20.8 Transboundary Effects

There are no changes to this section. Refer to Section 20.8 of Chapter 20 of the 2024 EIAR.

20.9 Cumulative Effects

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the Nationally Significant Infrastructure Projects (NSIP) (2024) guidance, as per RFI Section 5.

The second paragraph shall be deleted:

“The Cumulative and Inter-Related Effects Chapter contains the outcome of Stage 1 Establishing the list of ‘Other Existing and/or Approved Projects’; and Stage 2 ‘Screening of ‘Other Existing and/or Approved Projects’’. This section presents Stage 3, an assessment of whether the proposed development in combination with other projects, grouped in tiers, would be likely to have significant cumulative effects.”

And be replaced with:

Chapter 38: Cumulative and Inter-Related Effects contains the outcome of Stage 1 Establishing the list of ‘Other Existing and/or Approved Projects’; Stage 2 ‘Screening of ‘Other Existing and/or Approved Projects’; and provides the CEA conclusions in the NSIP Appendix 2: Matrix 1 – Assessment matrix. This section presents the full Stage 3 and Stage 4 assessment, which steps through whether the proposed development in combination with other projects, grouped in tiers, would be likely to have significant cumulative effects.

The fifth paragraph should be deleted:

“Given the location and nature of the proposed development, a tiered approach to establishing the list of other existing and/or approved projects has been undertaken in Stage 1 of the cumulative effects assessment. The tiering of projects is based on project relevance to the proposed development and it is not a hierarchical approach nor based on weighting. Further information on the tiers is provided in Section 11.10 and in the Cumulative and Inter-Related Effects Chapter.”

And be replaced with:

Given the location and nature of the proposed development, a tiered approach to establishing the list of other existing and/or approved projects has been undertaken in Stage 1 of the cumulative effects assessment. The tiering of projects is based on the NSIP 2024 guidance. Further information on the tiers is provided in Section 20.9.2 and in Chapter 38.

There are no other changes required to this section. Refer to Section 20.9 of Chapter 20 of the 2024 EIAR.

20.9.1 I&OU Cumulative Screening Exercise

There are no changes required to this section. Refer to Section 20.9.1 of Chapter 20 of the 2024 EIAR.

20.9.2 Projects Considered within the Cumulative Effects Assessment

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

The entire section shall be deleted and replaced with:

The planned, existing and/or approved projects selected through the screening exercise as potentially relevant to the assessment of impacts to I&OU are presented in Table A20.5 The tiers for the assessment are:

- Tier 1 is all existing submitted and approved projects (not yet in operation/part of baseline), including the OMF option being considered which involves the adaption and leasing part of an existing port facility at Greenore (further detail is provided in the Chapter 6) and the East Coast Phase One Projects.
- Tier 2 is all projects that have scoping reports or have a MAC.
- Tier 3 is all other projects include existing and/or approved developments that have been identified in the relevant Development Plans and other plans and programmes as appropriate.

The tiering structure is intended to provide an understanding of the potential for likely significant effects of the proposed development with the construction of all existing and submitted projects (tier one); followed by a cumulative assessment of the likely significant effect of that scenario combined with all projects that have a scoping report or Maritime Area Consent (MAC) (tier two); and lastly the combination of tier one and tier two with tier three, which is all other projects include existing and/or approved developments that have been identified in the relevant Development Plans and other plans and programmes as appropriate (tier three).

Table A20.5 Projects and plans considered within the cumulative impact assessment (replaces Table 20.12 of Chapter 20 of the 2024 EIAR)

Development type	Project	Status	Data confidence	Distance to the proposed development		Justification for screening into the cumulative effects assessment
				Array area	ECC	
Tier 1						
Dumping at Sea	Drogheda Port Company - Dumping Site A1	Consented	High	11.70km	10.25km	Ongoing dumping at sea activities within the study area and during the proposed development construction phase may result in a cumulative increase in SSC.
	Drogheda Port Company - Dumping Site A2	Consented	High	15.33km	14.28km	
Oil & Gas Pipelines	Interconnector 2 Scotland to Ireland	Active	High	0.52km	2.68km	Pipelines may require ongoing operation and maintenance activities which may result in short-term, temporary seabed disturbance which may impact on infrastructure and other users receptors cumulatively with the construction, operations and decommissioning activities of the proposed development
	Interconnector 1 Scotland to Ireland	Active	High	4.24km	10.60km	

Development type	Project	Status	Data confidence	Distance to the proposed development		Justification for screening into the cumulative effects assessment
				Array area	ECC	
Surveys	MaresConnect Electricity Interconnector Site Investigation	Consented	High	10.35km	17.99km	Site investigation works to inform development of a subsea cable 10km from the offshore development area at the closest point. Site investigation works have the potential to increase vessel numbers in the study area.
Subsea Cables	Havingstun SEG 1 Telecoms Cable	Active	High	0.68km	9.73km	Independent projects within 12km of proposed development. Ongoing impacts from the operation and maintenance of subsea cables may impact on infrastructure and other users receptors cumulatively with the construction, operations and decommissioning activities of the proposed development.
	Rockabill Telecoms Cable	Active	High	4.87km	12.85km	
	East West Interconnector Power Cable	Active	High	5.15km	11.57km	
	Hibernia Atlantic SEG C Telecoms Cable	Active	High	7.79km	17.09km	
	Sirius South Telecoms Cable	Active	High	9.41km	18.75km	
	CelticConnect Telecoms Cable	Active	High	11.29km	20.07km	
	Zayo Emerald Bridge One Telecoms Cable	Active	High	12.09km	20.23km	
Tier 2						
Subsea Cable	Mares Connect Power Cable	Pre-consent	Medium	6.02km	12.26km	Proposed subsea power cable with construction anticipated to take place from 2026 to 2028. Potential for temporal overlap with proposed development construction and operation and maintenance period.
Tier 3						
In Stage 2: Screening, there were no projects identified with the potential for interaction between effects with the proposed development.						

There are no other changes required to this section. Refer to Section 20.92 of Chapter 20 of the 2024 EIAR.

20.9.3 Project Impacts and Options Included in the Assessment

The change in this section is limited to the update replacing Table 20.13 with A20.6, this table reflects the update to impacts considered within this Chapter and the updated cumulative effects assessment that has been undertaken in response to RFI Section 5.

Table A20.6 Potential cumulative impacts and tiers for assessment (replaces Table 20.13 of Chapter 20 of the 2024 EIAR)

Potential cumulative impact	Phase	Tiers and projects	Justification for inclusion in cumulative effects assessment
1. Direct displacement or access impacts on subsea cables and pipelines associated with increased vessel movements and the use of advisory safety zones	Construction, operation and decommissioning	Tier 1/Tier 2 – Dumping at Sea, O&G pipelines, survey & subsea cables	The construction and operation of other projects may cause an increase in vessel traffic in the study area which may impact on subsea cables and pipelines maintenance activities.
2. Direct displacement or access impacts on marine recreational activities from increased vessel movements and the use of advisory safety zones	Construction, operation and decommissioning	Tier 1/Tier 2 – Dumping at Sea, O&G pipelines, survey & subsea cables	The construction and operation of other projects may cause an increase in vessel traffic in the study area which may impact on marine recreational activities.
3. Indirect disturbance or displacement impacts on marine recreational activities (from construction and decommissioning activities causing increased sediment dispersion and/or noise impacts, and/or impacts to fish species)	Construction and decommissioning	Tier 1/Tier 2 – Dumping at Sea, O&G pipelines & subsea cables	Construction and decommissioning works can cause temporary increase in SSC and associated sediment deposition and increases in underwater noise, which may affect sensitive fish and shellfish receptors, indirectly affecting marine recreational activity receptors (angling).
4. Indirect disturbance impacts on defence and security from proposed development works within the ECC	Construction, operation and decommissioning	Tier 1 – Dumping at Sea & Interconnector 2 Scotland to Ireland IC2 pipeline	There is the potential for maintenance activities from other projects to have a cumulative effect on the DoD Danger Area E1D1 as there is a temporal and physical overlap with the proposed development.

There are no other changes required to this section. Refer to Section 20.9.3 of Chapter 20 of the 2024 EIAR.

20.9.3.1 Cumulative Impact 1 - Direct Displacement or Access Impacts on Subsea Cables and Pipelines Associated with Increased Vessel Movements and the use of Advisory Safety Zones

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

The entire section shall be deleted and replaced with:

Tier 1

Projects that are screened into Tier 1 that may possibly have a cumulative impact with the proposed development during construction, operation and decommissioning on subsea cables and pipelines receptors from increased vessel movements are Dumping at Sea activities; survey activities related to the MaresConnect subsea cable; and existing cables and pipelines that may have ongoing maintenance activities (refer to Table A20.5).

All subsea cables and pipeline receptors are located outside of the offshore development area, the only potential cumulative effect on these receptors are from vessels transiting beyond the offshore development area within the study area and combining with the vessel movements from other projects. This could interfere with vessels involved with maintenance works for the receptors. These impacts will be of local and temporary duration. In the project alone assessment, the sensitivity of the receptors to the impact was deemed to be medium and this is retained in the cumulative assessment.

The Dumping at Sea activities undertaken by Drogheda Port are located outside of the offshore development area and any impacts are likely to be low spatial extent and intermittent in nature and are unlikely to cause a significant increase in vessel traffic and cause displacement or access issues for subsea cables and pipelines in combination with the proposed development. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Site investigation surveys are typically short-term and spatially limited, resulting in only minor, localised disturbance to other vessels. Survey activity related to MaresConnect project is likely to cause very little additional disturbance overall and the result will be similar to back ground activity. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Although a number of subsea cable and pipeline projects have been screened into the cumulative effects assessment at Tier 1, their position is outside of the offshore development area and operational activities for these projects are expected to involve very infrequent maintenance works which are unlikely to cause a significant increase in vessel traffic or displacement or access issues for other subsea cables and pipelines in combination with the proposed development and other Tier 1 projects. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the medium sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2

The project screened into Tier 2 that may possibly have a cumulative impact with the proposed development during construction, operation and decommissioning on subsea cables and pipelines receptors from increased vessel movements is the proposed MaresConnect subsea cable (refer to Table A20.5).

In the project alone assessment, the sensitivity of the receptors to the impact was deemed to be medium and this is retained in the cumulative assessment.

There is no publicly available information on the exact location of the MaresConnect subsea cable; however, it is anticipated to make landfall at one of five locations off the coast of County Dublin, including Ardgillan, Balcarrick, Loughshiny, Robswalls or Rush, as indicated by the MaresConnect Interconnector foreshore licence application. As such, construction works for MaresConnect are not anticipated to overlap spatially with proposed development works. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the medium sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All Tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 1.

Given the medium sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases would result in a not significant cumulative effect of all tiers, which is not significant in EIA terms.

20.9.3.2 Cumulative Impact 2 – Direct Displacement or Access Impacts on Marine Recreational Activities from Increased Vessel Movements and the use of Advisory Safety Zones

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

The entire section shall be deleted and replaced with:

Tier 1

Projects that are screened into Tier 1 that may possibly have a cumulative impact with the proposed development during construction, operation and decommissioning on marine recreational receptors from increased vessel movements are Dumping at Sea activities; survey activities related to the MaresConnect subsea cable; and existing cables and pipelines that may have ongoing maintenance activities (refer to Table A20.5).

An increase in vessel traffic both within the offshore development area and transiting to the offshore development area combined with additional vessel traffic from other projects could lead to minor route changes being required for marine recreational receptors (recreational sailing and diving). These impacts will be of local and temporary duration. In the project alone assessment, there are very few marine recreational activities occurring within the study area and the sensitivity of the receptors to the impact is deemed to be low and this is retained in the cumulative assessment.

The Dumping at Sea activities undertaken by Drogheda Port are located outside of the offshore development area and any impacts are likely to be low spatial extent and intermittent in nature and are unlikely to cause a significant increase in vessel traffic and cause displacement issues for marine recreational receptors in combination with the proposed development. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Site investigation surveys are typically short-term and spatially limited, resulting in only minor, localised disturbance to other vessels. Survey activity related to MaresConnect project is likely to cause very little additional disturbance overall and the result will be similar to back ground activity. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Although a number of subsea cable and pipeline projects have been screened into the cumulative effects assessment at Tier 1, their position is outside of the offshore development area and operational activities for these projects are expected to involve very infrequent maintenance works which are unlikely to cause a significant increase in vessel traffic or displacement issues for marine recreational receptors in combination with the proposed development and other Tier 1 projects. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the low sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2

The project screened into Tier 2 that may possibly have a cumulative impact with the proposed development during construction, operation and decommissioning on marine recreational receptors from increased vessel movements is the proposed MaresConnect subsea cable (refer to Table A20.5).

In the project alone assessment, the sensitivity of the receptors to the impact was deemed to be low and this is retained in the cumulative assessment.

There is no publicly available information on the exact location of the MaresConnect subsea cable; however, it is anticipated to make landfall at one of five locations off the coast of County Dublin, including Ardgillan, Balcarrick, Loughshiny, Robswalls or Rush, as indicated by the MaresConnect Interconnector foreshore licence application. As such, construction works for MaresConnect are not anticipated to overlap spatially with proposed development works. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the low sensitivity and negligible magnitude, the significance of the cumulative effect of tier 1 and 2 projects throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All Tiers)

No Tier 1 projects have been screened into the assessment of Cumulative Impact 2.

Given the low sensitivity and negligible magnitude, the significance of the cumulative effect of all tiers throughout the construction, operation and decommissioning phases would result in a not significant cumulative effect of all tiers, which is not significant in EIA terms.

20.9.3.3 Cumulative Impact 3 – Indirect Disturbance or Displacement Impacts on Marine Recreational Activities (from Construction and Decommissioning Activities Causing Increased Sediment Dispersion and/or Noise Impacts, and/or Impacts to Fish Species)

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, following the request by An Bord Pleanála in RFI Section 5.

The entire section shall be deleted and replaced with:

Tier 1

Projects that are screened into Tier 1 that may possibly have a cumulative indirect disturbance impact with the proposed development during construction, operation and decommissioning on marine recreational receptors are limited to Dumping at Sea activities; the Scotland to Ireland 1 & 2 Gas Interconnectors; and existing cables that may have ongoing maintenance activities (refer to Table A20.5).

These projects have the potential to cause temporary increase in SSC and associated sediment deposition which may overlap with SCC impacts from the proposed development and indirectly displace marine recreational activities of recreational sailing, other water sports and angling.

In the project alone assessment, the sensitivity of the receptors to the impact is deemed to be low for recreational sailing, other water sports and angling and this is retained for the cumulative assessment.

Although several subsea cables and O&G pipelines have been scoped into the cumulative effects assessment due to their proximity to the proposed development, operational activities for the projects are expected to involve infrequent maintenance works.

It is anticipated that increases in SSC and sediment deposition from the activities associated with the screened in projects will be close to background levels and will quickly disperse. This is unlikely to be perceptible by recreational marine activity receptors. Considering this, the distances from the proposed development and the dynamic nature of the environment, any effects from sediment dispersion on receptors are anticipated to be minimal. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the low sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2

The project screened into Tier 2 that may possibly have a cumulative indirect disturbance impact with the proposed development during construction, operation and decommissioning on marine recreational activities is the MaresConnect subsea cable.

In the project alone assessment, the sensitivity of the receptors to the impact is deemed to be low for recreational sailing, other water sports and angling and this is retained for the cumulative assessment.

It is anticipated that increases in SSC and sediment deposition from the activities will be close to background levels and will quickly disperse. This is unlikely to be perceptible by recreational marine activity receptors. Considering this, the distances from the proposed development and the dynamic nature of the environment, any effects from sediment dispersion on receptors are anticipated to be minimal. Taking this into account the magnitude of impact on receptors is anticipated to be negligible.

Given the low sensitivity and negligible magnitude, the significance of the cumulative effect of tiers 1 and 2 throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All Tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 3.

Given the low sensitivity and negligible magnitude, the significance of the cumulative effect of all tiers throughout the construction, operation and decommissioning phases would result in a not significant cumulative effect of all tiers, which is not significant in EIA terms.

20.9.3.4 Cumulative Impact 4 – Indirect Disturbance Impacts on Defence and Security from Proposed Development Works within the ECC

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, following the request by An Bord Pleanála in RFI Section 5.

The entire section shall be deleted and replaced with:

Tier 1

Of the Tier 1 projects screened into the cumulative assessment, there is potential for the following activities to intersect with Danger Area EID1:

- Interconnector 2 Scotland to Ireland IC2 pipeline;
- Drogheda Port Company – Dumping Site A1; and
- Drogheda Port Company – Dumping Site A2.

In the project alone assessment, the sensitivity of the receptor (the Defence Danger Area EID1) is deemed to be high and this is retained for the cumulative assessment.

The impact scoped in is limited, as the proposed development will not interfere with defence and security operations.

The proposed development will adhere to marine notices issued in relation to Danger Area EID1 and undertake consultation with the DoD prior to any construction works within the ECC (as per the embedded mitigation outlined in Table 20.9 of the 2024 EIAR) to ensure the risk of disturbance and disruption to military activities and practices will be minimised as far as practicable. It is reasonable to assume that all other projects will adhere to the same requirements of the DoD.

Consequently, the magnitude of impact resulting from indirect disturbance from cumulative impacts during construction, operation and decommissioning activities will be negligible.

Given the high sensitivity and negligible magnitude, the significance of the effect throughout the construction, operation and decommissioning phases will be not significant, which is not significant in EIA terms.

Tier 1 and 2

No Tier 2 projects have been screened into the assessment of Cumulative Impact 4.

Tier 1 and 2 and 3 (All Tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 4.

Consequently, the magnitude of impact resulting from indirect disturbance from cumulative impacts during construction, operation and decommissioning activities will be negligible.

Given the high sensitivity and negligible magnitude, the significance of the cumulative effect of all tiers throughout the construction, operation and decommissioning phases will be not significant of all tiers, which is not significant in EIA terms.

There are no other changes required to this section. Refer to Section 20.9.3.4 of the 2024 EIAR.

20.10 References

As a result of updating relevant guidance and legislation, the following references are added:

- [1] DCEE (2025a) The Future Framework for Offshore Renewable Energy. Available online: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/future-framework-for-offshore-renewable-energy/> [Accessed March 2026].
- [2] DCEE (2025b) The National Designated Maritime Area Plan (DMAP). Available online: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-designated-maritime-area-plan-dmap-for-offshore-renewable-energy/> [Accessed March 2026].

There are no other changes to this section. Refer to Section 20.10 of Chapter 20 of the 2024 EIAR.