Addendum to the Environmental Impact Assessment Report

NISA

North Irish Sea Array

Volume 5 - Wider Schemes Chapters

Chapter 29
Seascape, Landscape and Visual

Statkraft

CIP
Copenhagen Infrastructure Partners

GoBe
APEM Group

ARUP

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29. Seascape, Landscape and Visual

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 (now An Coimisiún 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. The Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI (further details on the design refinements are provided in Appendix A5.1: Design Refinements). Amendments are therefore required to Chapter 29: Seascape, Landscape and Visual of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2 in the Addendum to the EIAR.

For the purposes of clarity, this document shall be read in conjunction with the Chapter 29 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 tables can be identified by the "A" prefix in the table caption. Any changes within the 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 here is where a table has been replaced in its entirety.

The sections relevant to Chapter 29 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. Therefore, a review of the SLVIA baseline has been undertaken to comply with RFI 1 (b).
2 (a)	The Irish Coast Guard (IRCG), through the Department of Transport, has raised concerns in relation to the layout of the proposed development with respect to search-and-rescue (SAR) access. The applicant is requested to consult with the IRCG, in addressing these concerns, and provide further information and clarification on such matters.	The Developer has prepared updated layouts in consultation with the IRCG for both Project Options (see Section 6.2.3 Chapter 6 –Description of the Proposed Development for further details). These updated layouts have been assessed in this document. The refinements to the wind turbine (WTG) layouts have necessitated revisions to the SLVIA supported by updated Zone of Theoretical Visibility (ZTV) maps (Section 29.3) and verifiable photomontages (Section 29.5 and Volume 7C1 SLVIA Photomontages).
5	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. The applicant is advised that guidance exists in the UK, namely Nationally	The Cumulative Effects Assessment has been updated to incorporate the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment Guidance. The methodology is referenced in this chapter (see Sections 29.2, 29.5, 29.9 and 29.18).

RFI Section	RFI	Relevance to Chapter
	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)…	
10 (a)	Having regard to information submitted in the EIAR, the NPWS underwater noise guidelines (NPWS, 2014), the strict protections afforded to marine mammals under the Wildlife Act 1976, as amended, in addition to observations from prescribed bodies and observers, the Board requires a comprehensive suite of noise abatement measures to be proposed and assessed in addition to the existing mitigation measures referenced in the planning application documentation.	As a result of RFI Section 10 (a), the design of the wind turbine generator (WTG) and Offshore Substation Platform (OSP) foundations have changed from monopiles or jackets to suction bucket jacket (SBJ) foundations for the WTGs, and SBJ or jacket foundations with drilled pin piles for the OSP (which are detailed in Appendix A5.1 Design Refinements). The update to this chapter in relation to this, is provided in Sections 29.2 and 29.4.
13 (b)	Meath County Council raises concerns in relation to the submitted assessment of the visual impact of the proposal on views from historic sites within Meath, in particular from Brú na Bóinne (located circa 30km inland and west of the array area). Having regard to the sites UNESCO World Heritage designation, the applicant is requested to assess the proposed development having regard to the World Heritage Convention UNESCO Guidance Notes as they relate to visual impact assessment and wind energy projects, including the documents 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (UNESCO, 2022), 'Guidance for Wind Energy Projects in a World Heritage Context' (UNESCO, 2023), and available UNESCO case studies relating to the assessment of offshore projects on World Heritage sites.	Additional viewpoints have been included in the seascape impact assessment to address the concerns raised by Meath County Council. This is discussed in Section 29.2, 29.3 and 29.5, in addition, further details on the assessment of the viewpoints are also provided in Chapter 25 Onshore Archaeology, Architecture and Cultural Heritage.
13 (e)	The applicant is requested to review the draft [Flemington] LAP (or adopted LAP, where updated at time of this observation) and update the submitted application documentation accordingly, having regard in particular to potential for visual impacts from the substation on the draft LAP lands, potential traffic implications given the proposed access to the LAP lands directly adjoins the proposed access to the substation, and potential noise implications from the substation on the adjoining residential zoned lands.	Subsequent to the submission of the Planning Application, the draft Flemington Local Area Plan (LAP) was issued for consultation in September 2024 and was adopted by Fingal County Council in December 2024. This LAP, which consists of maps and a written statement, relates to currently rural lands adjacent to the southern boundary of the Grid Facility. The LAP also includes a proposed development layout as well as indicative building height. RFI Section 13 (e) notes that potential visual impacts from the Flemington LAP lands should be considered. Therefore, new sections specific to the Flemington LAP are incorporated throughout the chapter (see Sections 29.12, 29.14, 29.15, 29.16 and 29.19).In addition, the Developer has prepared an updated Landscape Mitigation Plan (planning drawing ref. 281240_MCR_ONS_GF_DR_YE_1010) which includes additional screening to mitigate impacts on the Flemington Local Area Plan (LAP).

29.1 Introduction

There are no changes to this section. Refer to Section 29.1 of Chapter 29 of the 2024 EIAR.

29.2 Part I – Seascape and Visual Assessment of Offshore Development Area

There are no changes to the introductory text of this section. Refer to Section 29.2 of Chapter 29 of the 2024 EIAR.

29.2.1 Design Options Assessed

There are no changes to this section. Refer to Section 29.2.1 of Chapter 29 of the 2024 EIAR.

29.2.2 Methodology

The Landscape Institute and Institute of Environmental Management and Assessment issued a clarifications document that was adopted in 2024 to be read in conjunction with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3-2013). Therefore, the following text shall be deleted from Section 29.2.2 of Chapter 29 of the 2024 EIAR:

- *"Landscape Institute and the Institute of Environmental Management and Assessment, Guidelines of Landscape and Visual Impact Assessment: Third Edition (2013) (referenced hereafter as GLVIA3)."*

And replaced with:

- Landscape Institute and the Institute of Environmental Management and Assessment, Guidelines of Landscape and Visual Impact Assessment: Third Edition (2013) (referenced hereafter as GLVIA3) in combination with the associated Clarifications Document (LITGN-2024-01).

29.2.3 Study Area

In accordance with RFI Section 13 (b), the change to this section is the update to the visual impact assessment with a series of additional heritage receptors, as requested by Meath County Council. Two of these (Hill of Tara and Hill of Skryne) fall outside of the 40km radius 'principal study area'. Consequently, the following text shall be added to Section 29.2.3 of Chapter 29 of the 2024 EIAR after the bullet point that commences 'Cumulative Study Area' …:

Note that viewpoints VP57 (Hill of Skryne) and VP58 (Hill of Tara) are outside of the principal study area but are included in the main visual impact assessment and cumulative visual impact assessment in accordance with RFI Section 13 (b).

There are no other changes to this section. Refer to Section 29.2.3 of Chapter 29 of the 2024 EIAR.

29.2.4 Methodology for Assessment of Effects

There are no changes to this section. Refer to Section 29.2.4 of Chapter 29 of the 2024 EIAR.

29.2.4.1 Seascape and Landscape Sensitivity

There are no changes to this section. Refer to Section 29.2.4.1 of Chapter 29 of the 2024 EIAR.

29.2.4.2 Seascape and Landscape Impact Magnitude

There are no changes to this section. Refer to Section 29.2.4.2 of Chapter 29 of the 2024 EIAR.

29.2.4.3 Visual Receptor Sensitivity

There are no changes to this section. Refer to Section 29.2.4.3 of Chapter 29 of the 2024 EIAR.

29.2.4.4 Visual Impact Magnitude

There are no changes to this section. Refer to Section 29.2.4.4 of Chapter 29 of the 2024 EIAR.

29.2.4.5 Seascape, Landscape and Visual Significance of Effect

There are no changes to this section. Refer to Section 29.2.4.5 of Chapter 29 of the 2024 EIAR.

29.2.4.6 Quality and Timescale of Effects

There are no changes to this section. Refer to Section 29.2.4.6 of Chapter 29 of the 2024 EIAR.

29.2.4.7 Assessment of Cumulative Effects

In accordance with RFI Section 5, the change to this section is an update to the assessment of cumulative effects to incorporate the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment Guidance. Therefore, Section 29.2.4.7 of the 2024 EIAR will be deleted in its entirety and replaced with the following section:

The planned, existing and/or approved projects selected through the screening exercise as potentially relevant to the assessment of impacts to seascape / landscape and visual are presented in Table A29.1.

Tier 1 projects consist of other existing and/or approved development which match the following criteria:

- Under construction;
- Permitted applications under the Planning Act or other regimes but not yet implemented;
- Submitted applications under the Planning Acting or other regimes but not yet determined; or
- All refusals subject to appeal procedures not yet determined.

In addition, Tier 1 also includes the east coast Phase One proposed offshore renewable energy projects. These are: Oriel Wind Park, Codling Wind Park, Arklow Bank II and Dublin Array.

In the NSIP guidance, the Tier 2 projects include other existing and/or approved development that include projects on the Planning Inspectorate's programme of projects. At the time of writing, there is no Irish equivalent to the Planning Inspectorate's programme of projects. Therefore, the NSIP Guidance has been interpreted in the Irish context to include all projects that have submitted a formal scoping opinion or have submitted an application for, or have obtained a Maritime Area Consent (MAC).

The Tier 3 projects include existing and/or approved development that have been identified in the relevant Development Plans and other plans and programmes as appropriate.

Refer to Chapter 38 Cumulative and Inter-Related Effects for further details on above Tiers.

Given the distance (34km), location and context of the Operations and Maintenance Facility (OMF) for the proposed development project (included in Tier 1) in relation to the proposed Offshore Infrastructure, no significant negative cumulative effects are predicted, and this project is therefore screened-out from further cumulative assessment.

For Tier 3 projects, no significant negative cumulative effects are predicted for projects, and these projects are therefore screened-out from further cumulative assessment. The exception to this is the Flemington Local Area Plan (See Section 29.11 Part II – Landscape and Visual Assessment of Onshore Development Area).

Following the scoping process for relevant cumulative projects, Part 1 of this chapter (Seascape and Visual Assessment) will only address cumulative impacts in relation to the screened-in east coast Phase One proposed offshore renewable energy projects and one onshore wind energy development (Table A29.1), noting that a detailed cumulative assessment in relation to those projects is contained in Appendix A29.2 and summarised in Section 29.9 of this chapter.

Table A29.1 Projects and plans considered within the cumulative impact assessment

Development type	Project	Status	Data confidence	Distance to the proposed development		Justification for screening into the cumulative effects assessment
				Array area	Export Cable Corridor	
Tier 1						
East coast Phase One proposed offshore renewable energy projects	Oriel Wind Park	Pre-consent	High – Proposed WTG details shared between Phase One developers	16.9km	21.6km	Overlap in construction period, Oriel Wind Park due to construct during 2026-2028 and potential for combined visibility of WTGs from common visual receptors
	Dublin Array	Pre-consent	High – Proposed WTG details shared between Phase One developers	32.9km	37.6km	Overlap in construction period, Dublin Array due to construct during 2028-2032 and potential for combined visibility of WTGs from common visual receptors
	Codling Wind Park	Pre-consent	High – Proposed WTG details shared between Phase One developers	50.9km	56.9km	Overlap in construction period, with Codling Wind Park due to construct during 2027-2028 and potential for combined visibility of WTGs from common visual receptors
	Arklow Bank Phase 2	Pre-consent	High – Proposed WTG details shared between Phase One developers	76.4km	80.0km	Screened-out due to location well outside of 60km radius cumulative study area
Proposed onshore renewable energy project	Kellystown Wind Farm	Permitted	High – full planning application available for review	27km	25km	Due to distance from the proposed development potential cumulative effect with the proposed WTG array during the operational phase
Tier 2						
Multi-use port facility	Bremore Port Project	Pre-consent	Low – only conceptual flythrough provided via website available to date	16.3km	0.2km	Potential overlap in construction period with Bremore Port and potential for combined visibility of WTGs from common visual receptors. Screened out due to poor data confidence

Note: Cumulative effects in relation to other projects screened-in for assessment in combination with the proposed onshore infrastructure is contained in Chapter 38.

The NatureScot Offshore Renewables – Guidance on assessing the impact on coastal landscape and seascape, Guidance for Scoping an Environmental Statement (SNH, 2012) identifies that Cumulative Seascape, Landscape and Visual Impact Assessment should be carried out with reference to the GLVIA-2013 and to SNH guidance Cumulative Effect of Windfarms 2005 (now updated to 2012), which set out the background for this aspect of assessment - "*Although initially compiled in response to onshore windfarm developments, the basic assessment methodology is the same".*

A key consideration in the Guidance is the nature of cumulative visibility as described below.

'Combined visibility occurs where the observer is able to see two or more developments from one viewpoint. Combined visibility may either be in combination (where several wind farms are within the observer's arc of vision at the same time) or in succession (where the observer has to turn to see the various wind farms).

Sequential effects occur when the observer has to move to another viewpoint to see different developments. The occurrence of sequential effects may range from frequently sequential (the features appear regularly and with short time lapses between, depending on speed of travel and distance between the viewpoints) to occasionally sequential (long time lapses between appearances, because the observer is moving very slowly and / or there are large distances between the viewpoints.)'

The GLVIA (2013) defines cumulative landscape and visual effects as those that 'result from additional changes to the landscape and visual amenity caused by the proposal in conjunction with other developments (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future.' In this instance cumulative effects are assessed in relation to other permitted or planned developments on the basis that, where relevant, any existing developments will present in the baseline of the main assessment.

The principal focus of the cumulative assessment of east coast Phase One Offshore Wind Farms will be the relationship between the array area and these projects for which design details have been shared between the Phase 1 Developers and from submitted development consents to inform the assessments to ensure a robust approach could be taken. Key considerations are:

- The location of the array area relative to other arrays;
- The extent of developed sea horizon from the combined arrays;
- The number of other visible arrays and their relative distance / scale, viewing angle, lateral extent and layouts configuration; and
- Relative Seascape context.

29.2.4.8 Assessment of Project Options

Due to the refinement of the Project Option 1 and Project Option 2, the WTG layout of both project options shown in Figure 29.5a and Figure 29.5b is updated. Therefore, Figures 29.5a and 29.5b from the 2024 EIAR are deleted and replaced with Figure A29.2a and Figure A29.2b.

In addition to the refinement of the Project Option 1 and Project Option 2 WTG layouts within the array area, instead of either monopiles or jackets, only jackets will be used. Additionally, instead of installation with pin piles the jackets will be installed with suction buckets. Monopiles are no longer considered for the OSP. The OSP will have jacket foundations with either suction buckets or drilled pin piles (see Appendix A5.1 for further information). Thus Table 29.10 from the 2024 is deleted and replaced with Table A29.1. The changes are highlighted in grey.

Table A29.1 High Level Overview of the two Project Options for the proposed development

Parameter	Project Option 1	Project Option 2
Number of WTG	49	35
WTG tip height (m above LAT)	290	316 outside aviation restricted zone, 311 inside aviation restricted zone*
WTG hub height (m above LAT)	165	178
Rotor Diameter (m)	250	276
Foundation type	Multi-leg suction bucket jackets (hereafter referred to as 'SBJs')	SBJs
Offshore Substation Platform (OSP)	1 OSP	1 OSP

* An aviation restricted zone (of 312m LAT) has been identified by the Developer due to the partial overlap of the array area with a Dublin Airport controlled airspace meaning 8 turbines will have a 5m reduction in tip height due to being within the aviation restricted zone. This is further detailed in Volume 3, Chapter 19: Aviation and Radar. Note, photomontages apply the tallest tip height to all turbines as a precautionary approach.

An additional five viewpoints (VP) have been provided in response to RFI Section 13 (b). Two of these are within the Brú na Bóinne complex and support the original VP18, which was the single / original representative viewpoint from this receptor, hence the new viewpoints are labelled VP18a and VP18b. Other additional viewpoints are added to the end of the sequence of VP numbering used for both the offshore elements of the project and the onshore elements. These are VP56, VP57 and VP58, which

relate to views from Gormanstown Castle, the Hill of Skryne and the Hill of Tara as requested by Meath County Council.

Note that VP57 and VP58 are outside of the 40km radius principal study area but are assessed in both the main assessment and cumulative assessment given that they were specifically requested as part of RFI Section 13 (b).

The Developer also notes an administrative error in Table 29.11; Viewpoints VP46 and VP47 were also omitted from Table 29.11 in the 2024 EIAR but are now included. In addition, VP36 and VP37 were marked (x) as being included only in the cumulative visual impact assessment, when in fact they were also included in the assessment of visual impacts within the array area. This has been corrected in Table A29.2.

Therefore, Table 29.11 is deleted from the 2024 EIAR and replaced with Table A29.2, which includes the additional VPs. The changes are highlighted in grey.

Table A29.2 Visual Impact Assessment type at selected viewpoints

VP No.	Visual Impact Assessment of WTGs within Array Area (both Project Options within principal study area)	Visual Impact Assessment of Grid Facility	Cumulative Visual Impact Assessment	Night time Visual Impact Assessment
VP1	X		X	
VP2	X		X	
VP3	X		X	
VP4	X		X	
VP5	X		X	
VP6	X		X	
VP7	X		X	
VP8	X		X	
VP9	X		X	
VP10	X		X	
VP11	X		X	
VP12	X		X	
VP13	X		X	X
VP14	X		X	
VP15	X		X	
VP16	X		X	
VP17	X		X	
VP18	X		X	
VP18a	X		X	
VP18b	X		X	
VP19	X		X	
VP20	X		X	
VP21	X		X	
VP22	X		X	
VP23	X		X	
VP24	X		X	X

VP No.	Visual Impact Assessment of WTGs within Array Area (both Project Options within principal study area)	Visual Impact Assessment of Grid Facility	Cumulative Visual Impact Assessment	Night time Visual Impact Assessment
VP25	X		X	
VP26	X		X	X
VP27	X		X	
VP28	X		X	
VP29	X		X	
VP30	X		X	
VP31	X		X	
VP32	X		X	X
VP33	X		X	
VP34	X		X	
VP35	X		X	
VP36	X		X	
VP37	X		X	
VP38			X	
VP39			X	
VP40			X	
VP41			X	
VP42			X	
VP43			X	
VP44			X	
VP45			X	
VP46			X	
VP47			X	
VP56	X		X	
VP57	X		X	
VP58	X		X	

29.2.5 Data Collection and Collation

There are no changes to this section. Refer to Section 29.2.5 of Chapter 29 of the 2024 EIAR.

29.2.6 Relevant Guidance and Policy

There are no changes to the introductory text in this section. Refer to Section 29.2.6 of Chapter 29 of the 2024 EIAR.

29.2.6.1 National Marine Planning Framework (NMPF - 2021)

There are no changes to this section. Refer to Section 29.2.6.1 of Chapter 29 of the 2024 EIAR.

29.2.6.2 Seascape Character Assessments

There are no changes to this section. Refer to Section 29.2.6.2 of Chapter 29 of the 2024 EIAR.

29.2.6.3 County Development Plans

Due to the design refinement, the WTG layout shown in Figure 29.4, Figure 29.5c and Figure 29.6 is updated and replaced with Figure A29.1, Figure A29.2c and A29.3.

There are no other changes to this section. Refer to Section 29.2.6.3 of Chapter 29 of the 2024 EIAR.

29.2.6.4 Northern Ireland

There are no changes to this section. Refer to Section 29.2.6.4 of Chapter 29 of the 2024 EIAR.

29.2.6.5 UNESCO Dublin Bay Biosphere and Bru na Boinne

In accordance with RFI Section 13 (b) the change to this section is in relation to the Bru na Boinne megalithic complex. The following text has been included as a new paragraph at the end of Section 29.2.6.5 of the 2024 EIAR:

The UNESCO World Heritage site of Bru na Boinne is contained approximately 15km inland from the Drogheda coastline on the northern banks above the River Boyne. It consists of numerous megalithic burial features, the most notable of which are the passage tombs of Newgrange, Knowth and Dowth.

There are no further changes to this section. Refer to Section 29.2.6.5 of Chapter 29 of the 2024 EIAR.

29.3 Baseline Environment

There are no changes to the introductory text of this section. Refer to Section 29.3 of Chapter 29 of the 2024 EIAR.

29.3.1 Zone of Theoretical Visibility (ZTV) Mapping

Due to the design refinement, the WTG layout shown in Figure 29.8, Figure 29.11 and Figure 29.12 is updated. In addition, the five new viewpoints (VP) provided in response to RFI Section 13 (b) are included in Figure 29.11. Finally, Figure 29.8 is updated to include Kellystown Wind Farm, a proposed onshore renewable energy project, in the cumulative ZTV (see Section 29.2.4.7 for further details). Therefore, Figure 29.8, Figure 29.11 and Figure 29.12 from the 2024 EIAR are deleted and replaced with Figure A29.5, Figure A29.6 and A29.7

There are no other changes to the introductory text in this section. Refer to Section 29.3.1 of Chapter 29 of the 2024 EIAR.

29.3.1.1 Bare-Ground ZTV mapping

Given the considerable distance from shore and the unchanged offshore development area the envelope of development is very similar and there was no material change to the bare-ground ZTV patterns. Consequently, there are no changes to this section. Refer to Section 29.3.1.1 of Chapter 29 of the 2024 EIAR.

29.3.1.2 Digital Surface Model (DSM) ZTV mapping

Due to the refinements in WTG layouts for Project Option 1 and Option 2 (see Appendix A5.1 for further information) the visibility statistics have changed marginally. Therefore, the following text from Section 29.3.1.2 of Chapter 29 of the 2024 EIAR is deleted:

"In broad terms the percentage of land covered by ZTV pattern, indicating potential for views of the WTGs, reduces from 62.1% for the bare-ground DTM-based ZTV map, down to only 27.3% for the DSM-based ZTV map once screening by vegetation and buildings is accounted for."

And replaced with:

In broad terms the percentage of land covered by ZTV pattern, indicating potential for views of the WTGs, reduces from 64.7% for the bare-ground DTM-based ZTV map, down to only 28% for the DSM-based ZTV map once screening by vegetation and buildings is accounted for.

There are no other changes to this section. Refer to Section 29.3.1.2 of Chapter 29 of the 2024 EIAR.

29.3.2 Seascape and Landscape Baseline

In accordance with RFI Section 13 (b) the change to this section is in relation to the Bru na Boinne megalithic complex. The following text has been included as a new paragraph at the end of Section 29.3.2 of the 2024 EIAR:

The UNESCO World Heritage site of Bru na Boinne is contained approximately 15km inland from the Drogheda coastline on the northern banks above the River Boyne. It consists of numerous megalithic burial features, the most notable of which are the passage tombs of Newgrange, Knowth and Dowth.

There are no other changes to this section. Refer to Section 29.3.2 of Chapter 29 of the 2024 EIAR.

29.3.3 Visual Receptors

There are no changes to this section. Refer to Section 29.3.3 of Chapter 29 of the 2024 EIAR.

29.3.3.1 Visual Receptors at Designated Scenic Routes and Views

There are no changes to this section. Refer to Section 29.3.3.1 of Chapter 29 of the 2024 EIAR.

29.3.3.2 Visual Receptors at Centres of Population

In response to RFI Section 13 (b), and upon reviewing the request from Meath County Council to include additional heritage receptors within the SLVIA, five additional viewpoints have been included to this assessment. Therefore, both Table 29.33 and Table 29.34 are deleted from the 2024 EIAR and replaced with Table A29.3 and Table A29.4 **respectively. The changes are highlighted in grey.**

Table A29.3 Brú na Bóinne, UNESCO World Heritage Site

Location	Relevance	Representative View
Newgrange	Yes – No visibility shown on ZTV and no access to top of tomb to the public but requested for representation at RFI stage.	Directly represented by VP18a
Knowth	Yes – Partial DTM based ZTV, but no DSM based ZTV (screened by vegetation). Access allowed to top of tomb.	Directly represented by VP18b
Dowth	Yes – Partial DTM based ZTV, but no DSM based ZTV (screened by vegetation). Access allowed to top of tomb.	Directly represented by VP18
Brú na Bóinne Visitor Centre	Not relevant – No visibility shown on ZTV	Scoped out

Table A29.4 Other heritage and amenity receptors

Location	Relevance	Representative View
Knockree, Mourne Park	Yes – Partial to full ZTV, views over coast	Generally represented by VP1
Slieve Binnian, Mourne Mountains	Marginal – Varied ZTV, distant views of coastline	Generally represented by VP1, VP2
Knockshee	Yes – Full to partial visibility, elevated distant views of coastline	Generally represented by VP1, VP4, VP8
Slieve Foy and Slievenaglogh	Yes – partial to full visibility and elevated viewpoint to coastline	Directly / Generally represented by VP6, VP7
Carlingford, King John's Castle	No – Very limited ZTV visibility	Scoped-out

Location	Relevance	Representative View
Carlingford Priory	No – Very limited ZTV visibility	Scoped-out
Carlingford Harbour	No – Very limited ZTV visibility	Scoped-out
Carlingford Greenway	No – Very limited ZTV visibility	Scoped-out
Blackrock Beach and Esplanade, Dundalk	Yes – Full visibility and views to sea	Directly represented by VP10
Dunany Point	Yes – Full to partial visibility, views towards site	Directly represented by VP11
Barmeath Castle	Marginal – partial visibility set back from coastline	Generally represented by VP11, VP12
Annagassan and Salterstown.	Marginal – Partial visibility, coastline oriented away from site	Generally represented by VP10, VP11
Monasterboice	No – No potential visibility, set well back from coastline	Scoped-out
Clogherhead Beach	Yes – Full visibility, strong relationship to coast and surrounds	Directly represented by VP13
Clogherhead Cliff Walk	Yes – Partial to full visibility, strong relationship to coast and surrounds	Generally represented by VP13
Clogherhead Port Oriel	Marginal – partial ZTV, oriented away from site	Generally represented by VP13
Seapoint and Baltray Golf Links	Yes – Partial to full visibility, strong relationship to coast and surrounds	Generally represented by VP15
Laytown and Bettystown Golf Links	Yes – Partial to full visibility, strong relationship to coast and surrounds	Generally represented by VP16
Hill of Tara	Yes – within partial bare-ground ZTV, but very distant and set well away from coastal influence (30km inland). Requested for inclusion at RFI stage	Directly Represented by VP58
Hill of Skryne	Yes - within partial bare-ground ZTV, but very distant and set well away from coastal influence (29km inland). Requested for inclusion at RFI stage	Directly Represented by VP57
Mellifont Abbey	No – No potential visibility, well away from coast	Scoped-out
Four Knocks Tomb	No – Varied visibility, contextually away from coast.	Scoped-out
Lusk Round Tower	Marginal – partial visibility and inland location	Scoped-out
Gormanstown Castle	Yes – within bare-ground ZTV, but coastal views substantially screened	Generally represented by VP56
Ardgillan Castle and Demesne & Ladies Stairs	Yes – partial to full visibility and costal location.	Directly represented by VP23
Skerries Harbour, Martello Tower, Skerries South Beach	Yes – Partial to full visibility and coastal character/location	Directly represented by VP24

Location	Relevance	Representative View
Skerries Mills, Skerries Golf Club	Marginal – partial to full visibility and some coastal influence.	Generally represented by VP24
Loughshinny Beach, harbour and Martello Tower,	Yes – Generally full visibility and coastal character	Directly represented by VP25
Rush North Beach, Rush Harbour and South Beach.	Yes – Generally full visibility (except Rush South Beach with limited visibility) and coastal character	Directly represented by VP26
Rockabill Lighthouse	Marginal – High visibility, however no longer occupied.	Contextually represented by VP36 and VP37 (Lambay Island)
Lambay Island	Yes – Partial to full visibility, strong relationship to coast and surrounds	Directly represented by VP36 and VP37
Irelands Eye	Marginal – Partial visibility (Behind Lambay Island, not occupied by residents	Generally represented by VP30, VP33
Malahide Castle	Yes – Full ZTV, although set back from coast	Generally represented by VP29
Malahide Marina, Yacht Club, Esplanade, Martello Tower	Yes – varied visibility, all directed towards coastline	Directly represented by VP29
Portmarnock	Yes – Clear visibility and views towards coast	Directly represented by VP30
Malahide Golf Club, Portmarnock Golf Club, Portmarnock Hotel, Resort and Jameson Golf Links	Yes – Partial to full visibility and relationship with coast	Generally represented by VP30
Donabate Beach	Yes – Partial to full visibility and views with coast, albeit oriented away from site	Directly represented by VP28
Newbridge House and Farm, Donabate	Marginal– Partial to full visibility, set back from coast	Generally represented by VP27, VP28
Beaverstown Golf Club	Marginal– Partial visibility, some views to, and relationship with Rogerstown Estuary, limited to east coast.	Generally represented by VP27
Donabate Golf Club, Corballis Links Golf Club, Balcarrick Golf Club, The Islands Golf Club	Marginal– Partial visibility, some views to, and relationship with coast, coastline oriented away from site	Generally represented by VP28
Sutton Golf Club, Burrow Beach	Yes – Partial to full visibility and relationship with coast	Generally represented by VP30, VP31, VP32
Howth Castle, Deer Park Golf, Howth Golf Club, Howth Demense	Yes – Partial visibility and relationship with coast, slightly offset by transport corridors and elevation	Generally represented by VP32, VP33
Howth Harbour, surrounds, incl. Martello Tower and yacht club	Yes – Partial visibility and relationship with coast,	Directly represented by VP32
Howth Cliff Walk	Yes – Partial to full visibility and relationship with coast,	Directly represented by VP33
Doldrum Walk, O'Pint Beach, Red Rock, Sutton Martello Tower, Telegraph Cable, Doldrum Beach	No – Screened by terrain, oriented away from array area	Scoped-out

Location	Relevance	Representative View
Baily Lighthouse, Howth Head	Marginal – Very limited potential visibility, primary viewing angle from north, directed away from site	Generally represented by VP32, VP33
Bray to Greystones – Cliff Walk	Yes – Partial to full ZTV, located directly above coastline	Generally represented by cumulative viewpoint VP46
Bray Head Loop Walk	Yes – Partial to full ZTV, views over coast	Generally represented by cumulative viewpoint VP46
Belmont Way/ Little Sugar Loaf	Yes – Partial to full ZTV, views over coast	Generally represented by cumulative viewpoint VP46, VP47
Great Sugar Loaf	Yes – Partial to full ZTV, views over coast	Generally represented by cumulative viewpoint VP47
Djouce Woods, Crone Woods	Marginal – Varied ZTV, distant views of coastline	Generally represented by cumulative viewpoint VP47
Kilruddery House, Bray	Marginal – Partial ZTV, set back from coast	Scoped-out
Powerscourt Estate	No – Screened by terrain, set away from coast	Scoped-out
Killiney Strand	No – Killiney Strand generally screened, oriented southeast.	Scoped-out
Killiney Hill	Yes – Partial ZTV. Views of coastline and Dublin Bay are a key part of amenity value	Directly represented by cumulative viewpoint VP44
Dún Laoghaire Harbour and yacht clubs	Yes – Partial ZTV. Views of Dublin Bay are a key part of amenity value	Directly represented by cumulative viewpoint cumulative viewpoint VP42
Sandycove, Forty Foot Swimming beach	Yes – Partial ZTV. Views of Dublin Bay are a key part of amenity value	Directly represented by cumulative viewpoint VP43
Seapoint Beach	Yes – Full ZTV. Views of Dublin Bay are a key part of amenity value	Generally represented by cumulative viewpoint VP41
Sandymount Beach	Yes – Full ZTV. Views of Dublin Bay are a key part of amenity value	Generally represented by VP39
Blackrock Park, Dublin	Yes – Full ZTV. Views of Dublin Bay are a key part of amenity value	Directly represented by cumulative viewpoint VP40
Poolbeg Lighthouse	Yes – Full ZTV. Views of Dublin Bay are a key part of amenity value	Directly represented by VP34
Bull Island, The Royal Dublin Golf Club, St Annes Golf Club, Dollymount Strand	Marginal – Partial to full ZTV, however views of Dublin Bay to the southeast.	Generally represented by VP34
St Annes Park	Marginal – Partial to full ZTV, however highly vegetated, and views of Dublin Bay to the southeast.	Generally represented by VP34
Mouth of the Liffey, Dublin Port	No – No visibility	Scoped-out
Attractions within North Dublin city centre (3km from O'Connell Bridge north, east, west)	No – No visibility	Scoped-out

Location	Relevance	Representative View
Attractions within South Dublin city centre (to Grand Canal)	Marginal – limited visibility, high proportion of built screening, character not directly related to coastline.	Generally represented by VP34, VP35
Guinness Storehouse	No – potential visibility from elevated bar but outside of principle study area and visual focus on surrounding city.	Scoped-out
Phoenix Park	Marginal – Partial ZTV, however highly vegetated, and with no relationship to coastline	Scoped-out

There are no other changes to this section. Refer to Section 29.3.3.2 of Chapter 29 of the 2024 EIAR.

29.4 Characteristics of the Proposed Development

In addition to the altering of Project Option 1 and Project Option 2 WTG layouts within the array area, the foundation type has been changed from monopiles to suction bucket jackets for WTGs, and from monopiles to jackets with either suction bucket or drilled pin piles for the OSP. In addition, the OSP was proposed to have either four or six-legged jacket foundations; which is now confirmed to be four (see Appendix A5.1 for further information). Therefore, Table 29.35 from the 2024 is deleted and replaced with Table A29.5. The changes are highlighted in grey.

Table A29.5 Key Characteristics of Project Options 1 and 2

Key Offshore Characteristics	Project Option 1	Project Option 2
Array area	88.5km^2	88.5km^2
Export Cable Corridor (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
WTG	49 WTGs with a tip height of 290m, hub height of 165m and 250m rotor diameter	35 WTGs with a tip height of 316m*, hub height of 178m and 276m rotor diameter
WTG Foundations	SBJs with 8 m (min) to 15 m (max) diameter (per suction bucket). Skirt length penetration into seafloor 5 m (min) to 30 m (max).	SBJs with 8 m (min) to 15 m (max) diameter (per suction bucket). Skirt length penetration into seafloor 5 m (min) to 30 m (max).
Offshore Substation Platform (OSP) Foundations (array area)	One OSP, with four-legged jacket foundation with either suction bucket or drilled pin pile substructures**	One OSP, with a four-legged jacket foundation with either suction bucket or drilled pin pile substructures**
Cables	Installation of 111km of inter array cables within the array area and installation of two 18km subsea export cables within the ECC	Installation of 91km of inter array cables within the array area and installation of two 18km subsea export cables within the ECC

* An aviation restricted zone (of 312m LAT) has been identified by the Developer due to the partial overlap of the array area with a Dublin Airport controlled airspace meaning 8 turbines will have a 5m reduction in tip height due to being within the aviation restricted zone. This is further detailed in Volume 3, Chapter 19: Aviation and Radar. Note, photomontages apply the tallest tip height to all turbines as a precautionary approach.

** As the OSP was proposed to have either four or six-legged jacket foundations in the 2024 EIAR the photomontages were developed using six legged to provide a worst-case scenario. The confirmation of a four-legged jacket is not considered to be material to the assessment and is likely to be barely discernible in the photomontages.

There are no other changes to this section. Refer to Section 29.4 of Chapter 29 of the 2024 EIAR.

29.5 Potential Effects

In accordance with RFI Section 5, the change to this section is an update to the assessment of cumulative effects to incorporate the NSIPs: Advice on Cumulative Effects Assessment Guidance.

Therefore, Section last paragraph in 29.5 of the 2024 EIAR will be deleted:

"Standalone visual impacts arising from the proposed array area beyond the principal study area are scoped-out of the visual impact assessment. Whilst there remains some potential for visibility of WTGs beyond this distance in the clearest of viewing conditions, their relative scale at such distances combined with the effects of atmospheric perspective (fading of distant objects), eye acuity (the ability for the eye to resolve narrow objects at distance) and partial screening from earth curvature, all combine to prevent any potential for significant visual effects to occur. Cumulative impacts in relation to Tier 2, East coast Phase One offshore wind energy developments will be considered for all viewpoints within the cumulative study area (60km).

This cumulative assessment is detailed in Appendix 29.2 and summarised in Section 29.9 of this chapter as these cumulative effects are considered to be a key aspect of the SLVIA. Cumulative effects with other Tier 1 and Tier 3 projects are contained in Chapter 38."

And replaced with:

Standalone visual impacts arising from the proposed array area beyond the principal study area are scoped-out of the visual impact assessment. Whilst there remains some potential for visibility of WTGs beyond this distance in the clearest of viewing conditions, their relative scale at such distances combined with the effects of atmospheric perspective (fading of distant objects), eye acuity (the ability for the eye to resolve narrow objects at distance) and partial screening from earth curvature, all combine to prevent any potential for significant visual effects to occur. Cumulative impacts in relation to Tier 1, east coast Phase One offshore wind energy developments will be considered for all viewpoints within the cumulative study area (60km). This cumulative assessment is detailed in Appendix A29.2 and summarised in Section 29.9 of this chapter as these cumulative effects are considered to be a key aspect of the SLVIA. Cumulative effects with other Tier 1, Tier 2 and Tier 3 projects are contained in Chapter 38.

There are no further changes to this section. Refer to Section 29.5 of Chapter 29 of the 2024 EIAR.

29.5.1 Do-Nothing Scenario

Even though there are some changes to the construction methods in terms of offshore structure foundations, these are not material to the SLVIA and there are no changes to this section. Refer to Section 29.5.1 of Chapter 29 of the 2024 EIAR**.**

29.5.2 Seascape and Landscape Sensitivity

There are no changes to this section. Refer to Section 29.5.2 of Chapter 29 of the 2024 EIAR.

29.5.3 Construction Phase Seascape Impacts

There are no changes to this section. Refer to Section 29.5.3 of Chapter 29 of the 2024 EIAR.

Therefore, the conclusion of the 2024 EIAR that there are no significant construction phase seascape impacts arising from the proposed development remains unchanged.

29.5.4 Construction Phase Visual Effects

Due to the inclusion of five additional heritage viewpoints in response to the RFI Section 13 (b) the following text is deleted from Section 29.5.4 the 2024 EIAR:

"Visual receptor sensitivity is assessed in relation to the 47 representative VPs used for the visual impact assessment of the two project options."

And replaced with the following text:

Visual receptor sensitivity is assessed in relation to the 52 representative VPs used for the visual impact assessment of the two project options.

The conclusion of the 2024 EIAR that there are no significant construction phase visual effects arising from the proposed development remains unchanged. There are no further changes to this section. Refer to Section 29.5.4 of Chapter 29 of the 2024 EIAR.

29.5.5 Operational Phase Seascape Effects

There are no changes to the introductory text in this section. Refer to Section 29.5.5 of Chapter 29 of the 2024 EIAR.

29.5.5.1 Seascape and Landscape Assessment of Project Options

The updated Project Option 1 and Project Option 2 WTG layouts were considered and the conclusion that there are no significant operational phase seascape impacts arising from the proposed development remains unchanged. Consequently, there are no changes to this section. Refer to Section 29.5.5.1 of Chapter 29 of the 2024 EIAR.

29.5.6 Operational Phase Visual Effects

The updated Project Option 1 and Project Option 2 WTG layouts were considered in relation to operational phase visual effects using revised photomontage sets.

In response to RFI Section 13 (b), five additional heritage related viewpoints have been included and the Developer notes the administrative error in the text below (the number of viewpoints was incorrectly stated as 35 VPs and should read 37 VPs). As a result of the above, there are now 42 VPs used for the assessment of Project Option 1 and Project Option 2. Hence the following text is deleted from Section 29.5.6 of Chapter 29 of the 2024 EIAR:

"The Operational Phase visual effects of the offshore elements, namely the WTGs and OSP within the array area, is one of the principal considerations of the SLVIA. As identified in section 29.2.4.6, 35 no. of the selected VPs were assessed in terms of visual impacts upon the visual receptors (i.e. people or groups of people) from both Project Option 1 and Project Option 2."

And replaced with the following text:

The Operational Phase visual effects of the offshore elements, namely the WTGs and OSP within the array area, is one of the principal considerations of the SLVIA. As identified in section 29.2.4.6, 42 no. of the selected VPs were assessed in terms of visual impacts upon the visual receptors (i.e. people or groups of people) from both Project Option 1 and Project Option 2.

There are no further changes required to this section. Refer to Section 29.5.6 of Chapter 29 of the 2024 EIAR.

29.5.6.1 Visual Assessment of Project Options

In response to RFI Section 13 (b), the five additional heritage related viewpoints have been included, and the number of viewpoints is corrected to 37 VPs. As a result, there are now 42 viewpoints used for the assessment of Project Option 1 and Project Option 2. Hence the following text is deleted from Section 29.5.6.1 of Chapter 29 of the 2024 EIAR:

"Throughout the assessment of both project options, it was apparent that none of the 35 VPs used for the visual impact assessment of the offshore infrastructure within the array area, was deemed to generate a different magnitude of impact for the two project options."

And replaced with the following text:

Throughout the assessment of both project options, it was apparent that none of the 42 VPs used for the visual impact assessment of the offshore infrastructure within the array area, was deemed to generate a different magnitude of impact for the two project options.

In addition to the five heritage viewpoints, the layout changes to the Project Option 1 and Project Option 2 WTG arrays have resulted in changes to operational phase visual impact assessments at four of the original viewpoint locations (VP27, VP28, VP29 and VP32). Hence, Table 29.39 is deleted and replaced with Table A29.6. The changes are highlighted in grey.

Table A29.6 Operational Phase Visual Effects

Array Area Viewpoint	Visual Receptor Sensitivity	Magnitude of Impact (Pre-Mitigation)	Significance / Quality / Duration of Visual Effect
VP1 Knockree Summit Co. Down (NI)	Very High	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP2 Ballymartin, Co. Down	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP3 Kilkeel, Co. Down	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP4 Greencastle Ferry Terminal	Medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP5 Greenore Ferry Terminal	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP6 Aghameen, Co. Louth	High	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP7 Barnevave Summit, Coolea Mountains	Very High	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP8 Coolea Point	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP9 Gyles Quay	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP10 Blackrock Promenade	High-medium	Low-negligible	Slight-imperceptible/ Neutral-Negative/ Long-term
VP11 Dunany Bay Beach	High-medium	Low	Moderate-slight/ Negative / Long-term
VP12 Lurganboy Beach	High-medium	Low	Moderate-slight/ Negative / Long-term

Array Area Viewpoint	Visual Receptor Sensitivity	Magnitude of Impact (Pre-Mitigation)	Significance / Quality / Duration of Visual Effect
VP13 Clogherhead Beach	High	Medium-low	Moderate / Negative / Long-term
VP14 Local Road at Castlecoe Hill	High-medium	Medium-low	Moderate / Negative / Long-term
VP15 Termonfeckin Beach	High-medium	Medium-low	Moderate / Negative / Long-term
VP16 Bettystown Beach	High-medium	Medium-low	Moderate / Negative / Long-term
VP17 Amenity Area, Laytown	High-medium	Medium-low	Moderate / Negative / Long-term
VP18 Dowth Passage Tomb	Very High	Negligible	Imperceptible/ Neutral/ Long-term
VP18a Newgrange Passage Tomb (Eastern side)	Very High	Negligible	Imperceptible/ Neutral/ Long-term
VP18b Knowth Passage Tomb	Very High	Negligible	Imperceptible/ Neutral/ Long-term
VP19 Kennetstown	High	Low	Moderate-slight/ Negative / Long-term
VP20 Gormanston Beach	High-medium	Medium-low	Moderate / Negative / Long-term
VP21 Balbriggan Beach	High-medium	Medium	Moderate / Negative / Long-term
VP22 R108 at Snowtown	High	Low	Moderate-slight/ Negative / Long-term

Array Area Viewpoint	Visual Receptor Sensitivity	Magnitude of Impact (Pre-Mitigation)	Significance / Quality / Duration of Visual Effect
VP23 Ardgillen Castle Grounds	High	Medium	Major-moderate / Negative / Long-term
VP24 Amenity Area Skerries	High-medium	Medium	Major-moderate / Negative / Long-term
VP25 Loughshinny	High-medium	Medium	Major-moderate / Negative / Long-term
VP26 Coast Road Rush	High-medium	Medium	Moderate / Negative / Long-term
VP27 Portrane	High-medium	Medium-low	Moderate-slight / Negative / Long-term
VP28 Donabate Beach	High-medium	Negligible	Imperceptible/ Neutral / Long-term
VP29 Malahide	High-medium	Low-negligible	Slight-imperceptible/ Negative / Long-term
VP30 Portmarnock Beach	High-medium	Medium-low	Moderate-slight/ Negative / Long-term
VP31 Sutton Promenade	High-medium	Medium-low	Moderate-slight/ Negative / Long-term
VP32 Howth Harbour	High-Medium	Low	Slight/ Negative / Long-term
VP33 Howth Head	High	Medium-low	Moderate-slight/ Negative / Long-term
VP34 Great South Wall at Poolbeg Lighthouse	Medium	Low-negligible	Slight-imperceptible/ Negative / Long-term

Array Area Viewpoint	Visual Receptor Sensitivity	Magnitude of Impact (Pre-Mitigation)	Significance / Quality / Duration of Visual Effect
VP35 Sandymount Strand	Medium	Negligible	Imperceptible/ Neutral / Long-term
VP36 Lambay Island – Summit, County Dublin (Fingal)	High-medium	Medium	Moderate / Negative / Long-term
VP37 - Lambay Island – Pier, County Dublin (Fingal)	High-medium	Medium	Moderate / Negative / Long-term
VP56 – Gormanston Castle (road outside)	High-medium	Low-negligible	Slight-imperceptible/ Negative / Long-term
VP57 – Hill of Skryne	High	Negligible	Slight-imperceptible/ Negative / Long-term
VP58 – Hill of Tara	Very High	Negligible	Imperceptible/ Neutral/ Long-term

The additional heritage related views (VP18a, VP18b, VP56, VP57 and VP58) are incorporated into the summary of visual impacts in this section. Additionally, there are also some changes to Visual Impact Assessments for four of the viewpoints as a consequence of the revised layouts. Therefore, the following text from Section 29.5.6.1 of Chapter 29 of the 2024 EIAR is deleted:

"In addition to the coastline views between Dundalk and Skerries, there are also a number of inland views from elevated locations that were considered, which included some designated scenic routes / views and important heritage and amenity features. The most important of these is VP18 from within the UNESCO World heritage site of Brú na Bóinne. VP18 is from the top of Dowth Passage Tomb, which is the nearest of the three Brú na Bóinne passage tombs to the array area and the only one that still allows visitors to climb to the top. There is no view of the proposed WTGs afforded from here and the viewpoint was used for illustrative purposes i.e., to illustrate the absence of impact at this important receptor.

At most of the inland viewpoints (VP11, VP19 and VP22) the significance of visual impact is reduced to Moderate-slight. This is on the basis of the generally greater viewing distances and the fore-to-middle ground landscape context, which tends the render the proposed WTG array as perceptually more of a background feature, even when it will be openly visible. The one exception to this is the marginally inland VP23 from the grounds of Ardgillen Castle in the rural hinterland of Skerries. At this location, framed views are afforded down sloping lawns to the sea and the proposed WTGs will fill most of the framed sea horizon at distances from 16km to 24km away (nearest to furthest). At this distance the WTGs have a broad lateral extent but are not overbearing in terms of vertical scale and it is a clear and simple view of the array. Nonetheless, the proposed development represents the introduction of built elements into a seascape currently only occupied by Rockabill Lighthouse and passing vessels. These factors are considered to balance out at a Medium magnitude of visual impact and when combined with the High sensitivity of the receptor the likely significance of effect is deemed to be Major-moderate / Negative. This is one of three visual receptors to be attributed, what is the highest significance assessed for the proposed offshore visual

assessment overall. However, it must be reiterated that Major-moderate effects are not deemed to be significant effects in EIA terms."

And replaced with:

In addition to the coastline views between Dundalk and Skerries, there are also a number of inland views from elevated locations that were considered, which included some designated scenic routes / views and important heritage and amenity features. The most important of these are VP18, VP18a and VP18b from within the UNESCO World heritage complex of Brú na Bóinne. VP18 is from the top of Dowth Passage Tomb, which is the nearest of the three Brú na Bóinne passage tombs to the array area. There is no view of the proposed WTGs afforded from here and the viewpoint was used for illustrative purposes (i.e., to illustrate the absence of impact at this important receptor).

There is also no potential for visibility of the proposed WTG from Newgrange Passage tomb (VP18a), which is the most iconic of the Brú na Bóinne passage tombs. In the case of Newgrange, visibility is fully precluded by terrain screening. From the top of Knowth passage tomb (VP18b), which is the most distant of the Brú na Bóinne features from the proposed WTG (33km away), there is some limited potential for visibility of several turbine blade tips. However, intervening vegetation fully screens these from view and consequently, the visual impact from Brú na Bóinne is collectively deemed Imperceptible.

Views from the considerably inland Hill of Skryne and the Hill of Tara are represented by VP57 and VP58 respectively. Whilst there is potential to view turbine blades above an intervening and undulating skyline ridge from both of these highly sensitive receptor locations the viewing distances are beyond 41.6km for the hill of Skryne and beyond 45km from the Hill of Tara and it is very unlikely that the WTG components would be noticed by a casual observer even in the clearest of viewing conditions. Consequently, the significance of visual effect is deemed to be Slight-imperceptible for VP57 and Imperceptible for VP58.

At most of the other inland viewpoints (VP56, VP19 and VP22) the significance of visual impact is Moderate-slight or lower. This is on the basis of the generally greater viewing distances and the fore-to-middle ground landscape context, which tends to render the proposed Project Option 1 and 2 WTG layouts as perceptually more of a background feature, even when it will be openly visible. In the case of VP56 from the road to the east of Gormanston Castle, the partial and fleeting visibility of several turbines between tree tops results in a Slight-imperceptible visual impact. Although there appears to have once been an axial view from the Castle towards the sea, it has since been dissected by a series of roadside and field boundary hedgerows / treelines. The one exception to the above trend is the marginally inland VP23 from the grounds of Ardgillen Castle in the rural hinterland of Skerries. At this location, framed views are afforded down sloping lawns to the sea and the proposed WTGs will fill most of the framed sea horizon at distances from 16km to 24km away (nearest to furthest). At this distance the WTGs have a broad lateral extent but are not overbearing in terms of vertical scale and it is a clear and simple view of the Project Option 1 and 2 WTGs. Nonetheless, the proposed development represents the introduction of built elements into a seascape currently only occupied by Rockabill Lighthouse and passing vessels. These factors are considered to balance out at a Medium magnitude of visual impact and when combined with the High sensitivity of the receptor the likely significance of effect is deemed to be Major-moderate / Negative. This is one of three visual receptors (including VP24 and VP25) to be attributed, what is the highest significance assessed for the proposed offshore visual assessment overall. However, it must be reiterated that Major-moderate effects are not deemed to be significant effects in EIA terms.

There are also some changes to Visual Impact Assessments for four of the viewpoints as a consequence of the revised layouts, particularly due to the reduced south-eastern lateral extent of the revised Project Option 1 and Project Option 2 WTG layouts when seen from some south-westerly receptor locations. The altered assessments relate to VP27 – Portrane, VP28 Donabate Beach, VP29 – Malahide and VP32 – Howth Harbour. Consequently, the following text from Section 29.5.6.1 of Chapter 29 of the 2024 EIAR is deleted:

"Views from Skerries to Howth Head are represented by VP24 to VP33 and all consist of coastline views. As highlighted in the Regional Seascape Assessment, this is a more complex section of coastline than that further north and consists of shallow bays, beaches, low sea cliffs, estuaries, and islands. Consequently, the proposed WTGs are seen in a more complex manner often above and/or adjacent to coastal landform features, albeit at considerable distances between c. 15km and 30 km to nearest turbines. They also represent longshore views to the northeast rather than directly offshore views like their more northerly

counterparts beyond Skerries. Whilst this can make for more complex views of turbines overlapping within coastal features, it does make the array more peripheral in direct sea vistas to the east.

VP24 at Skerries is discussed above and the nearby coastal harbour settlement of Loughshinny (VP25), although slightly further away from the Array Area, experiences a similar scale and nature of visual impact. Therefore, these views are also assessed as incurring a Major-moderate significance of effect.

The other North Dublin Coastal settlements of Rush and Portrane are both considered to experience Moderate / Negative visual impacts, whilst further south at the settlement beaches of Donabate, Malahide, Portmarnock and Sutton, the significance of visual effect ranges between Moderate-slight and Slight / Negative on the basis of viewing distances between 22k and 30km to nearest turbines.

It should be noted that although the sensitivity and magnitude judgements for VP25 at Loughshinny and VP26 at Rush are the same, the significance of effect is marginally lower at the latter because of the nuances of increased viewing distance and peripheral viewing angle relative to the coastline."

And replaced with:

The other North Dublin Coastal settlements of Rush (VP26) and Portrane (VP27) are considered to experience Moderate and Moderate-slight visual impacts respectively, whilst further south at the settlement beaches of Malahide (VP29), Portmarnock and Sutton, the significance of visual effect ranges between Moderate-slight and Slight-imperceptible on the basis of viewing distances between 22km and 30km to nearest turbines and sometimes partially obscured visibility due to headlands. Indeed, the proposed WTG are fully screened from view by an intervening headland from the beach at Donabate (VP28). It should be noted that although the sensitivity and magnitude judgements for VP25 at Loughshinny and VP26 at Rush are the same, the significance of effect is marginally lower at the latter because of the nuances of increased viewing distance and peripheral viewing angle relative to the coastline.

The following text from the 2024 EIAR is also deleted:

***"Howth Harbour (VP32) and Howth Head (VP33)** are both deemed to be important and sensitive visual receptors as this iconic North Dublin coastal setting draws high numbers of tourists and recreationalists throughout the year. Although the proposed WTGs are nearly 29km away, there is some overlap with the intervening islands of Ireland's Eye and Lambay Island which generates a minor degree of ambiguity and on balance the significance of effect is deemed to be Moderate-slight at both VP32 and VP33."*

And replaced with:

Howth Harbour (VP32) and Howth Head (VP33) are both deemed to be important and sensitive visual receptors as this iconic North Dublin coastal setting draws high numbers of tourists and recreationalists throughout the year. Although the proposed WTGs are nearly 29km away, there is some overlap with the intervening islands of Ireland's Eye and Lambay Island which generates a minor degree of ambiguity. However, from VP32 at Howth Harbour the WTGs only occur above the landward side of the islands and not the seaward side. On balance the significance of effect is deemed to be Slight at VP32 and Moderate-slight at VP33.

There are no further changes required to this section, and the conclusion of the 2024 EIAR that there are no significant operational effects arising from the visual assessment of the proposed development remains unchanged. Refer to Section 29.5.6.1 of Chapter 29 of the 2024 EIAR.

29.5.6.2 Views from Ferry Corridor and Flightpaths

The assessment considered Project Option 1 and Project Option 2 WTG layouts, however, there are no changes to this section. Refer to Section 29.5.6.2 of Chapter 29 of the 2024 EIAR.

Therefore, the conclusion of the 2024 EIAR that there are no significant operational effects on views from ferry corridors and flight paths arising from the proposed development remains unchanged.

29.5.6.3 Climate and Visibility Frequency

The assessment considered Project Option 1 and Project Option 2 WTG layouts, however, there here are no changes to this section. Refer to Section 29.5.6.3 of Chapter 29 of the 2024 EIAR.

29.5.6.4 Night-Time Visual Effects from WTG Lighting

The assessment considered Project Option 1 and Project Option 2 WTG layouts, however, there here are no changes to this section. Refer to Section 29.5.6.4 of Chapter 29 of the 2024 EIAR. Note: Additional night-time photomontages were prepared in response to the Department of Defence's request for illumination of the WTG with Type C medium intensity fixed red obstacle lighting. These are provided in Appendix A29.3. The conclusion of the 2024 EIAR that there will not be any significant night-time effects emanating from WTG lighting remains unchanged.

29.5.7 Decommissioning

29.5.7.1 Decommissioning Phase Seascape Effects – Offshore Infrastructure

There are no changes to this section. Refer to Section 29.5.7.1 of Chapter 29 of the 2024 EIAR.

29.5.7.2 Decommissioning Phase Visual Effects

There are no changes to this section. Refer to Section 29.5.7.2 of Chapter 29 of the 2024 EIAR.

29.6 Mitigation and Monitoring Measures

29.6.1 Construction Phase

There are no changes to this section. Refer to Section 29.6.1 of Chapter 29 of the 2024 EIAR.

29.6.2 Operational Phase

There are no changes to this section. Refer to Section 29.6.2 of Chapter 29 of the 2024 EIAR.

29.6.3 Decommissioning

There are no changes to this section. Refer to Section 29.6.3 of Chapter 29 of the 2024 EIAR.

29.7 Residual Effects – Offshore Infrastructure

There are no changes to this section. Refer to Section 29.7 of Chapter 29 of the 2024 EIAR.

29.8 Transboundary Effects

Due to the five additional viewpoints (VP) provided in response to RFI Section 13 (b) Figure 29.7a is updated. Therefore, Figure 29.7a from the 2024 EIAR is deleted and replaced with Figure A29.4.

The assessment considered Project Option 1 and Project Option 2 WTG layouts, however, there here are no other changes to this section. Refer to Section 29.8 of Chapter 29 of the 2024 EIAR.

29.9 Cumulative Effects

In accordance with RFI Section 5, the change to this section is an update to the assessment of cumulative effects to incorporate the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment Guidance. In addition, as a result of the inclusion of the five additional heritage related viewpoints there are now 52 VPs used for the cumulative assessment of Project Option 1 and Project Option 2. Finally, the Developer notes an administrative error in Table 29.40 of the 2024 EIAR: viewpoints VP36 Annalong (NI) onwards were incorrectly numbered and should have been presented as VP38 Annalong (NI) and subsequent viewpoints.

Therefore, Section 29.9 of the 2024 EIAR will be deleted in its entirety and replaced with the following section:

One of the key aspects of this SLVIA is the potential cumulative impact of the proposed WTGs with other developments, including other offshore wind developments, which are identified as Project 2-5. The cumulative assessment with other Tier 1 projects is detailed in Appendix A29.2 and focuses on the proposed WTG array during the operational phase. It considers the cumulative visual effects with other East Coast

'Phase 1' offshore wind energy developments contained within the 60km radius cumulative study area of which there are three and one onshore wind energy development;

- Oriel Array - 16km north of the proposed development array area consisting of c. 25 turbines
- Dublin Array- 36km south of the proposed development array area consisting of c. 48 turbines
- Codling Wind Park - 53km South of the proposed development array area consisting of c. 75 turbines
- Kellystown Wind Farm – 25km north of the proposed development consisting of c. 5 turbines

There is potential that the constructions phases of Tier 1 projects might overlap and, if this occurred, there would be a greater intensity of vessel movement to and from the respective sites.

However, the sites are all separated by considerable distances, which reduces the potential for discernible cumulative seascape and visual effects from the increased vessel traffic due to its dispersal and limited intervisibility. Such effects would also be temporary or short-term in duration and thus, there is not considered to be any potential for significant construction phase cumulative effects to occur other than those relating to the emerging turbines which are covered in the assessment of operational phase cumulative effects.

Operation phase cumulative impacts are assessed from all 52 of the selected viewpoints using the 90-degree wireline images in conjunction with corresponding baseline images, being the first sheet for each viewpoint (in accordance with visual representation guidance). Where necessary due to widely disparate viewing angles between cumulative arrays, a second 90-degree wireline is also provided in order to take in the relevant cumulative development.

The cumulative visual impact assessment included in Appendix A29.2 and summarised below, relates to the contribution of the proposed development array area (Project Option 1 / Project Option 2) to the overall cumulative impact of proposed East coast Phase 1 offshore wind developments within the cumulative study area and resultant cumulative effects. It is not an assessment of the aggregated overall cumulative impact of all developments. The data for the other proposed East coast Phase 1 projects was shared by each of the developers and where WTG layout options are being taken forward, it is the option with the tallest tip height that has been used on the basis that this represents the greatest extent of visibility / intervisibility in terms of the ZTV mapping.

Table A29.7 Cumulative Effect Summary (derived from Appendix A29.2)

VP No.	Sensitivity of VP receptor (from Table 29.39)	Magnitude of Cumulative Impact	Significance of Cumulative Effect
VP1 Knockree Summit Co. Down (NI)	Very High	Low-negligible	Slight
VP2 Ballymartin, Co. Down	High-medium	Low-negligible	Slight-imperceptible
VP3 Kilkeel, Co. Down	High-medium	Low-negligible	Slight-imperceptible
VP4 Greencastle Ferry Terminal	Medium	Low	Slight-imperceptible
VP5 Greenore Ferry Terminal	Medium	Low-negligible	Slight-imperceptible
VP6 Aghameen, Co. Louth	High	Medium-low	Moderate-slight
VP7 Barnevave Summit, Coolea Mountains	Very High	Low	Moderate-slight
VP8 Coolea Point	High-medium	Low	Slight
VP9 Gyles Quay	High-medium	Low	Slight

VP No.	Sensitivity of VP receptor (from Table 29.39)	Magnitude of Cumulative Impact	Significance of Cumulative Effect
VP10 Blackrock Promenade	High-medium	Low	Slight
VP11 Dunany Bay Beach	High-medium	Medium	Moderate
VP12 Lurganboy Beach	High-medium	Medium	Moderate
VP13 Clogherhead Beach	High	Negligible	Imperceptible
VP14 Local Road at Castlecoe Hill	High-medium	Medium	Moderate
VP15 Termonfeckin Beach	High-medium	Medium	Moderate
VP16 Bettystown Beach	High-medium	Medium-low	Moderate-slight
VP17 Amenity Area, Laytown	High-medium	Medium-low	Moderate-slight
VP18 Dowth Passage Tomb	Very High	Negligible	Imperceptible
VP18a Newgrange Passage Tomb (Eastern side)	Very High	Negligible	Imperceptible
VP18b Knowth Passage Tomb	Very High	Negligible	Imperceptible
VP19 Kennetstown	High	Low	Moderate-slight
VP20 Gormanston Beach	High-medium	Low	Slight
VP21 Balbriggan Beach	High-medium	Low	Slight
VP22 R108 at Snowtown	High	Low	Moderate-slight
VP23 Ardgillen Castle Grounds	High	Negligible	Imperceptible
VP24 Amenity Area Skerries	High-medium	Low-negligible	Slight
VP25 Loughshinny	High-medium	Low	Slight
VP26 Coast Road Rush	High-medium	Low-negligible	Slight-imperceptible
VP27 Portrane	High-medium	Negligible	Imperceptible
VP28 Donabate Beach	High-medium	Low-negligible	Slight
VP29 Malahide	High-medium	Negligible	Imperceptible
VP30 Portmarnock Beach	High-medium	Negligible	Imperceptible
VP31 Sutton Promenade	High-medium	Negligible	Imperceptible
VP32 Howth Harbour	High-Medium	Negligible	Imperceptible
VP33 Howth Head	High	Low-negligible	Slight
VP34 Great South Wall at Poolbeg Lighthouse	Medium	Low-negligible	Slight-imperceptible
VP35 Sandymount Strand	Medium	Negligible	Imperceptible

VP No.	Sensitivity of VP receptor (from Table 29.39)	Magnitude of Cumulative Impact	Significance of Cumulative Effect
VP36 Lambay Island – Summit, County Dublin (Fingal)	High-medium	Medium	Moderate
VP37 - Lambay Island – Pier, County Dublin (Fingal)	High-medium	Low-negligible	Slight-imperceptible
VP38 Annalong (NI)	High-medium	Low-negligible	Slight-imperceptible
VP39 Deer Park (Dublin)	Medium	Negligible	Imperceptible
VP40 Blackrock Park (Dublin)	Medium	Low-negligible	Slight-imperceptible
VP41 Coast Road, Monkstown	High-medium	Low-negligible	Slight-imperceptible
VP42 East Pier, Dún Laoghaire	High-medium	Negligible	Imperceptible
VP43 James Joyce Museum (Forty Foot), Sandycove	High-medium	Negligible	Imperceptible
VP44 Dalkey Hill	High	Low-negligible	Slight-imperceptible
VP45 Three Rock Mountain	High	Low-negligible	Slight-imperceptible
VP46 Bray Head	High	Low-negligible	Slight-imperceptible
VP47 Sugar Loaf	High	Low-negligible	Slight-imperceptible
VP56 – Gormanston Castle (road outside)	High-medium	Low-negligible	Slight-imperceptible
VP57 – Hill of Skryne	Very High	Negligible	Imperceptible
VP58 – Hill of Tara	Very High	Negligible	Imperceptible

29.10 Summary of Effects

The assessment considered Project Option 1 and Project Option 2 WTG and, as part of RFI Section 13 (b), the five additional heritage related viewpoints. However, this does not change the outcome of the assessment, and the overall significance of effects remains unchanged (not significant in EIA terms). Therefore, the only change to this section is reference to 37 no. viewpoint, which should be 42 no. viewpoints.

Refer to Section 29.10 of Chapter 29 of the 2024 EIAR.

29.11 Part II – Landscape and Visual Assessment of Onshore Development Area

There are no changes to the introductory text of this section. Refer to Section 29.11 of Chapter 29 of the 2024 EIAR.

29.11.1 Methodology

There are no changes to this section. Refer to Section 29.11.1 of Chapter 29 of the 2024 EIAR.

29.11.1.1 Study Area

There are no changes to this section. Refer to Section 29.11.1.1 of Chapter 29 of the 2024 EIAR**.**

29.11.2 Relevant Guidance and Policy

There are no changes required to this section. Refer to Section 29.11.2 of Chapter 29 of the 2024 EIAR.

29.12 Baseline Environment

Subsequent to the submission of the Planning Application, the draft Flemington Local Area Plan (LAP) was issued for consultation in September 2024 and was adopted by Fingal County Council in December 2024. This LAP, which consists of maps and a written statement, relates to currently rural lands adjacent to the southern boundary of the Grid Facility.

The LAP also includes a proposed development layout in Figure 3.1 as well as indicative building height. RFI Section 13 (e) notes that potential visual impacts from the Flemington LAP lands should be considered. Therefore, new sections specific to the Flemington LAP are incorporated throughout Section 29.12.

29.12.1 Landscape Context

There are no changes to this section, however it is noted that should the Flemington LAP lands to the south of the Grid Facility be developed in accordance with the plan, the urban residential fringe of Balbriggan will extend to the southern boundary of the Grid Facility site replacing the current agricultural land.

Refer to Section 29.12.1 of Chapter 29 of the 2024 EIAR.

29.12.2 Visual Receptors (Onshore Infrastructure Study Area)

There are no changes to this section. Refer to Section 29.12.2 of Chapter 29 of the 2024 EIAR.

29.12.2.1 Visual Receptors at Designated Scenic Routes and Views

There are no changes to this section. Refer to Section 29.12.2.1 of Chapter 29 of the 2024 EIAR.

29.12.2.2 Visual Receptors at Centres of Population

There are no changes to this section. Refer to Section 29.12.2.2 of Chapter 29 of the 2024 EIAR.

29.12.2.3 Visual Receptors on Major Routes

There are no changes to this section. Refer to Section 29.12.2.3 of Chapter 29 of the 2024 EIAR.

29.12.2.4 Local Residential Visual Receptors

There are no changes to this section, however it is noted that should the Flemington LAP lands to the south of the Grid Facility be developed in accordance with the plan, new residential receptors will be present within the lands immediately south of the Grid Facility.

Refer to Section 29.12.2.4 of Chapter 29 of the 2024 EIAR.

29.12.2.5 Visual Receptors at Tourism Amenity and Heritage Features

There are no changes to this section. Refer to Section 29.12.2.5 of Chapter 29 of the 2024 EIAR.

29.12.2.6 Flemington LAP lands

Section 29.12.2.6 is a newly introduced section relating specifically to the Flemington LAP lands in response to RFI Section 13 (e).

The recently adopted Flemington LAP provides for medium density residential development within the land immediately south and southwest of the Grid Facility, which will introduce up to 650 new homes within the 17.2-hectare site. The new residents would become visual receptors in respect of the Grid Facility. The Flemington LAP lands are currently contained in agricultural fields between the existing northern built edge

of Balbriggan and the proposed Grid Facility site. Boundary hedgerows and the rear gardens of dwellings lining the northern side of Flemington Lane lie to the south of the LAP lands, whereas treelines and hedgerow form the boundaries of the LAP to all other sides. Access to the LAP lands is from the R132 Regional road that lines the eastern boundary of the LAP and an internal access avenue is indicated on the LAP development layout along the north-eastern boundary closest to the Grid Facility.

29.13 Characteristics of the Proposed Development

There are no changes to the introductory text of this section. Refer to Section 29.13 of Chapter 29 of the 2024 EIAR.

29.13.1 Landfall site

There are no changes to this section. Refer to Section 29.13.1 of Chapter 29 of the 2024 EIAR.

29.13.2 Grid facility

An error was identified in the grid facility photomontages (Volume 7B) submitted as part of the 2024 EIAR. The error related to the height of the SVC building and environmental screens for the harmonic filters (shown to be higher than proposed). This has been corrected in the revised photomontage sets, which now reflect the lower heights (consistent with the 2024 EIAR Planning Drawings). Refer to the photomontages Volume 7C2: 2026 LVIA Photomontages NISA Grid Facility. This does not change the outcome of the assessment, and the overall significance of effects remains unchanged.

Additional screen planting is being provided along the southern boundary of the site to increase screening in respect of the future residents of the adjacent Flemington LAP lands. Consequently, the following text will be added to the end of this section:

Existing hedgerow vegetation surrounding the Grid Facility site will be supplemented with linear bands of native woodland thicket to aid screening for surrounding residential receptors, including the future residents of the Flemington LAP lands to the south and southwest.

29.13.3 Onshore cable route

There are no changes to this section. Refer to Section 29.13.3 of Chapter 29 of the 2024 EIAR.

29.14 Potential Effects

There are no changes to the introductory text of this section. Refer to Section 29.14 of Chapter 29 of the 2024 EIAR.

29.14.1 Landscape Sensitivity

There are no changes to this section. Refer to Section 29.14.1 of Chapter 29 of the 2024 EIAR.

29.14.2 Construction Phase Landscape Effects

There are no changes to this section. Refer to Section 29.14.2 of Chapter 29 of the 2024 EIAR.

29.14.3 Construction Phase Visual Effects

In accordance with RFI Section 13 (e), the Flemington LAP lands are also considered in terms of potential visual effects. Therefore, in the paragraph which commences "Although these photomontages…" from Section 29.14.3 of Chapter 29 of the 2024 EIAR the following text is deleted:

"When viewed from the road (Bremore Cottages) at the northern perimeter of Balbriggan (VP49 and VP55) substantial screening is provided by foreground dwellings, albeit those same dwellings will be afforded clearer views from their rear gardens. In the case of the nearer VP55, construction stage visual impacts are considered to be of a ***High-medium*** *magnitude, Negative quality and* ***Short-term*** *duration. This combination of receptor sensitivity and impact magnitude will result in a* ***Major-moderate*** *significance of impact (not significant)."*

And replaced with:

When viewed from the road (Bremore Cottages) at the northern perimeter of Balbriggan (VP49 and VP55) substantial screening is provided by foreground dwellings, albeit those same dwellings will be afforded clearer views from their rear gardens. In the case of the nearer VP55, construction stage visual impacts are considered to be of a **High-medium** magnitude, Negative quality and **Short-term** duration. This combination of receptor sensitivity and impact magnitude will result in a **Major-moderate** significance of impact (not significant). Should residential housing within the Flemington LAP lands be developed prior to the construction phase of the Grid Facility, visual effects from the Grid Facility construction will be similar to those that would be experienced from the rear of the existing Bremore Cottage dwellings, albeit in closer proximity. The LAP dwellings would substantially screen views of those same construction phase activities from Bremore Cottages, thereby reducing effects for those existing receptors. Given that notable treelined hedgerow screening from mature vegetation exists between the nearest of the proposed substation structures and the LAP lands, much of the ground-based construction activity would remain substantially screened from view.

However, the upper sections of the emerging and unfinished substation building would rise into view above this vegetation and this would be prior to the establishment of proposed supplementary woodland thicket planting to supplement the existing boundary vegetation. Consequently, the Construction Phase visual impact Magnitude is deemed to be **High** within the immediate vicinity of the southern substation building; noting however, that the LAP layout does not afford close range amenity views, from the front or rear of dwellings, directly towards the substation building. Consequently, the significance of effect would be **Major** (significant) from the nearest portion of the LAP lands to the Grid Facility site but reducing quickly thereafter on account of increasing viewing distance and screening by vegetation and buildings to Moderate and lower effects (Not significant).

29.14.4 Operational Phase Landscape Effects – Onshore Infrastructure

As a result of the adoption of the Flemington LAP, which will see future residential development emerge between the current urban edge of the Balbriggan and the Grid Facility, the following text is deleted from section 29.14.4 the 2024 EIAR:

This northward extension of the settlement is generally consistent with the zoning policies in the latest Fingal County Development Plan (2023-2029), which sees the intervening land between Bremore Cottages and the grid facility zoned for 'Residential' development. The grid facility remains within 'Rural' zoned lands and there is a road indicated between the rural and residential zoned lands.

And replaced with:

This northward extension of the settlement is generally consistent with the adoption of the Flemington LAP, which facilitates the intervening land between Bremore Cottages and the grid facility being developed for urban residential use. The grid facility remains within 'Rural' zoned lands and will retain and enhance existing boundary vegetation.

29.14.5 Operational Phase Visual Effects

In accordance with RFI Section 13 (e), the Flemington LAP lands are also considered in terms of potential visual effects. In addition, the substation colour scheme/finish takes into consideration the adoption of the Flemington LAP, to reflect a future scenario that is more urban edge than the current rural hinterland scenario and includes a higher architectural quality of finish. Therefore, the following text from Section 29.14.5 of Chapter 29 of the 2024 EIAR is deleted:

*When viewed from the road (Bremore Cottages) at the northern perimeter of Balbriggan (VP49 and VP55) substantial screening is provided by foreground dwellings, albeit those same dwellings will be afforded clearer views from their rear gardens. The highest level of impact from these views is at VP55, where a localised **Moderate / Negative** effect is assessed principally in relation to the nearest dwellings rather than the road itself.*

And replaced with:

When viewed from the road (Bremore Cottages) at the northern perimeter of Balbriggan (VP49 and VP55) substantial screening is provided by foreground dwellings, albeit those same dwellings will be afforded clearer views from their rear gardens. The highest level of impact from these views is at VP55, where a localised **Moderate / Negative** effect is assessed principally in relation to the nearest dwellings rather than the road itself. Should residential housing within the Flemington LAP lands be developed as planned, operational phase visual effects from the Grid Facility will be similar to those that would be experienced from the rear of the existing Bremore Cottage dwellings, albeit within closer proximity. However, the LAP dwellings would substantially screen views of the Grid Facility from Bremore Cottages, thereby reducing effects for those existing receptors. Visual impacts from the nearest of the substation structures will relate to partial views of the tall and bulky structure rising above the intervening treelined hedgerow. However, based on the configuration of the LAP layout, the Grid Facility would not occupy key amenity views from the front or rear of dwellings and will instead be oblique to the orientation of dwellings. The substation colour scheme/finish takes into consideration the adoption of the Flemington LAP, to reflect a future scenario that is more urban edge than the current rural hinterland scenario (subject to final agreement with EirGrid and Fingal County Council). This sees a geometric use of dark, light and mid tone cement render to break of the vertical and horizontal massing of the structures and provide a high architectural quality of finish.

Thus, the substation structures will appear as 'urban edge – commercial' rather than a design which is more 'rural-industrial'. Nonetheless, the proposed southern substation building could appear imposing from the nearest portions of the LAP lands. Visual impacts would be of a High magnitude from the immediate portion of the LAP lands to the Grid Facility site resulting in a **Major** effect (significant). However, from the majority of the LAP lands intervening vegetation and dwellings within the LAP lands will preclude visibility of the Grid Facility resulting in considerably reduced or no visual effects (not significant).

29.14.6 Decommissioning Phase Landscape Effects

There are no changes to this section. Refer to Section 29.14.6 of Chapter 29 of the 2024 EIAR.

29.14.7 Decommissioning Phase Visual Effects

There are no changes to this section. Refer to Section 29.14.7 of Chapter 29 of the 2024 EIAR.

29.15 Mitigation and Monitoring Measures

29.15.1 Construction Phase

There are no changes to this section. Refer to Section 29.15.1 of Chapter 29 of the 2024 EIAR.

29.15.2 Operational Phase

In addition to the revised colour scheme / finish now applied to the proposed substations as part of embedded mitigation, a revised Landscape Mitigation Plan has been prepared in response to RFI Section 13 (e) to address concerns regarding visual impacts at the Flemington LAP lands to the southeast of the grid facility. The revised landscape plan includes a woodland thicket along the south-eastern boundary, which will serve as a more substantial visual screen than the current hedgerow boundary that it will incorporate. Furthermore, for the section of boundary directly between the nearest grid facility substation and the Flemington LAP lands, large, semi-mature trees (30-40cm girth / 6-7m tall when planted) will be introduced to fill gaps in the existing mature treeline to provide more substantial and consolidated screening. These changes are provided in the Mitigation Plan (drawing ref. 281240_MCR_ONS_GF_DR_YE_1010).

There are no other changes to this section. Refer to Section 29.15.2 of Chapter 29 of the 2024 EIAR.

29.15.3 Decommissioning

There are no changes to this section. Refer to Section 29.15.3 of Chapter 29 of the 2024 EIAR.

29.16 Residual Effects

29.16.1 Construction Phase Residual Effects

There are no changes to this section. Refer to Section 29.16.1 of Chapter 29 of the 2024 EIAR.

29.16.2 Operational Phase Residual Effects

In accordance with RFI Section 13 (e), the Flemington LAP lands are also considered in terms of potential visual effects. Therefore, the following text from Section 29.16.2 of Chapter 29 of the 2024 EIAR is deleted:

For VP50, which is the clearest view of the proposed substation from the public realm, the residual significance of visual impact is reduced from Major-moderate / Negative to Moderate / Negative as the mitigation strategy is also revealed to its greatest advantage from here. At VP53, the residual significance of visual impact reduces from Slight / Negative to Slight-imperceptible / Negative.

None of the residual visual impacts is deemed to be significant in EIA terms.

And replaced with:

For VP50, which is the clearest view of the proposed substation from the public realm, the residual significance of visual impact is reduced from Major-moderate / Negative to Moderate / Negative as the mitigation strategy is also revealed to its greatest advantage from here. At VP53, the residual significance of visual impact reduces from Slight / Negative to Slight-imperceptible / Negative.

In relation to potential future views from the Flemington LAP lands, should they be developed as planned in the LAP layout, the newly introduced woodland thicket and semi-mature tree planting along the southern boundary of the Grid Facility site will serve as a more substantial visual screen and perceptual divide when viewed from the future LAP entrance avenue and the nearest dwellings to the Grid Facility. Residual visual effects will be reduced from Major to Major-moderate from the nearest portions of the LAP lands and reducing further with distance / screening by intervening buildings and vegetation, and also over time, as the proposed woodland thicket and semi-mature treeline continue to increase in volume and height.

None of the residual visual impacts are deemed to be significant in EIA terms.

It should be noted that as the LAP layout is still at early design stage and a planning application has yet to be lodged, therefore future LAP design layouts can be cognisant of the grid facility layout in terms of the arrangement of open space and orientation of dwellings, thereby further reducing potential residual visual effects.

29.16.3 Decommissioning

There are no changes to this section. Refer to Section 29.16.3 of Chapter 29 of the 2024 EIAR.

29.17 Transboundary Effects

There are no changes to this section. Refer to Section 29.17 of Chapter 29 of the 2024 EIAR.

29.18 Cumulative Effects

The Cumulative Effects Assessment (CEA) is presented in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. In response to RFI Section 5, the CEA has been updated to align with the UK Guidance document *Nationally Strategic Infrastructure Projects (NSIP) Advice on Cumulative Effects Assessment*. However, it should be noted that the overall conclusions of the CEA from a landscape and visual perspective (onshore development area) remain unchanged from the 2024 EIAR (as stated below).

Therefore, the entirety of Section 29.18 of Chapter 34 of the 2024 EIAR shall be deleted and replaced with the text herein:

A long list of "other existing and/or approved developments" landward of the HWM which were deemed to be potentially relevant for inclusion in the cumulative impact assessment was compiled (refer to Volume 6, Chapter 38: Cumulative and Inter-related Effects (hereafter referred to as 'Chapter 38')). A screening exercise of the "long list" was carried out in order to determine whether each of those "other existing and/or approved developments" has the potential to give rise to likely significant cumulative effects with the proposed development from a major accidents and disasters perspective. Many of the "other existing and/or approved developments" were screened out for a number of reasons including their location, scale and nature of the project. Those projects which were "screened in" were carried forward for assessment. The results of the assessment are presented in Section 38.2.3.20 of Chapter 38.

The assessment concluded that there are no likely significant direct or indirect cumulative effects on landscape and visual predicted during the construction, operation, or decommissioning phases of the proposed development.

29.19 Summary of Effects

In relation to RFI Section 13 (e) to address concerns regarding visual impacts at the Flemington LAP lands to the southeast of the grid facility, the following text is added to the end of the paragraph commencing with "When viewed from the Flemington Lane…":

It should also be noted that if the Flemington LAP lands between the Grid facility and Flemington Lane are developed, as planned, visual effects from the Grid Facility for receptors represented by VP49 and VP55 will likely reduce due to the screening provided by the intervening LAP development. In turn, some of the nearest future residential receptors to the Grid Facility within the LAP lands are likely to incur Major -moderate (not significant) visual effects. It should be noted that significant construction phase visual effects have the potential to occur from the nearest portion of the LAP lands due to the added construction phase machinery / clutter and before mitigation measures have been implemented. However, it is unlikely that the construction of dwellings within the LAP lands will precede construction of the Grid Facility.

There are no other changes to Section 29.19 and operational phase visual effects relating to the Grid Facility are considered to remain not significant.

29.20 References

The Landscape Institute and Institute of Environmental Management and Assessment issued a clarifications document that was adopted in 2024 to be read in conjunction with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3-2013). Therefore, the following text shall be deleted from Section 29.2.2 of Chapter 29 of the 2024 EIAR:

- *"Landscape Institute and the Institute of Environmental Management and Assessment, Guidelines of Landscape and Visual Impact Assessment: Third Edition (2013) (referenced hereafter as GLVIA3)."*

And replaced with:

- Landscape Institute and the Institute of Environmental Management and Assessment, Guidelines of Landscape and Visual Impact Assessment: Third Edition (2013) (referenced hereafter as GLVIA3) in combination with the associated Clarifications Document (LITGN-2024-01).