

Addendum to the  
Planning Report

**NISA**  
*North Irish Sea Array*

# Planning Report





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# Planning Report

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 in the Addendum to the EIAR). Amendments are therefore required to 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.

The RFI did not refer to the 2024 Planning Report. However, the amendments to EIAR require amendments to be made to the 2024 Planning Report. In addition, the timeframes associated with the RFI have necessitated a review of the data on which the 2024 Planning Report was based to ensure that any updates to the planning and policy environment, relevant to the proposed development, are addressed.

For the purposes of clarity, this document shall be read in conjunction with the 2024 Planning Report. Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Planning Report Update, unless explicitly stated otherwise. Any cross reference to anything included in the 2024 Planning Report will be clearly labelled as such.

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

The sections in the RFI relevant to Planning Report are included below.

RFI Section	RFI	Relevance to Planning Report
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 and Planning Report to ensure any necessary updates are captured. Therefore, a review of legal and policy framework changes that have occurred since the 2024 planning application submission has been completed to comply with RFI 1 (b). Any relevant changes are included in this report in Sections 2.6, 2.7, 2.10, 3.1, 3.4, 3.6, 3.7, 4.0, 5.1, 6.1, 6.2, 6.3, 6.5, 6.8, 7.1 – 7.6 and 8.0.
3	d) Incorporate the output from a), b) and c) and all other relevant updates made as a result of this request for further information, into a revised assessment of the NMPF policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on ‘important’ species and habitats as defined on page 35 and 36 of the NMPF....	An Coimisiún Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the National Marine Planning Framework (NMPF). The proposed development’s compliance with the NMPF has been updated in line with RFI 3, and this is referenced in Section 6.4 and Appendix D.
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	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

RFI Section	RFI	Relevance to Planning Report
	measures referenced in the planning application documentation.	Appendix A5.1 Design Refinements of the Addendum to the EIAR). The update to this chapter in relation to this, is provided in Section 2.1 (Figure A2.1).
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.	The adoption of the Flemington LAP has been considered in terms of local planning policy, and the report has been updated accordingly (Sections 5.1 and 6.7).

# 1. Introduction

## 1.1 Introduction

**This section is updated to refer to the planning application submitted to An Bord Pleanála in June 2024 and the RFI received by the Developer.**

**Therefore, the following paragraph from Section 1.1 is deleted:**

*“A planning application is being submitted to An Bord Pleanála under Section 291 of the Planning and Development Act 2000, as amended (the “Planning Acts”) to carry out the proposed development.”*

**And replaced with:**

A planning application was submitted to An Bord Pleanála on 7 June 2024. A Request for Further Information (RFI) was received by the Developer by a letter issued by An Coimisiún Pleanála to the Developer on 10 April 2025.

**In addition, any reference throughout the 2024 Planning Report to An Bord Pleanála, or the Board, should be replaced with An Coimisiún Pleanála (unless it refers to actions occurring pre-submission in June 2024), in accordance with the Planning and Development Act 2024 (Part 17, Section 495(3)).**

**There are no further changes to the section. Refer to Section 1.1 of the 2024 Planning Report.**

## 1.2 Report Structure

**Any reference in this section, and throughout the 2024 Planning Report, to the planning application supporting documents, including the EIAR, plans, sections and elevations should be understood to refer to the planning application supporting documents, including the EIAR, plans, sections and elevations, as amended in response to the RFI.**

**There are no further changes to the section. Refer to Section 1.2 of the 2024 Planning Report.**

## 2. Overview of the Proposed Development

### 2.1 Project Overview

The only change required to Section 2.1 of the 2024 Planning Report is in relation to Figure 2.1. The figure, which presented wind turbine generators (WTGs) with monopiles, has been updated to show the WTGs with jacket substructures and suction bucket foundations and to remove the previous depiction of an ownership boundary, as this aspect is not relevant to the graphical illustration of the proposed development.

For the purposes of clarity, Figure 2.1 from the 2024 Planning Report shall be deleted and replaced with Figure A2.1.

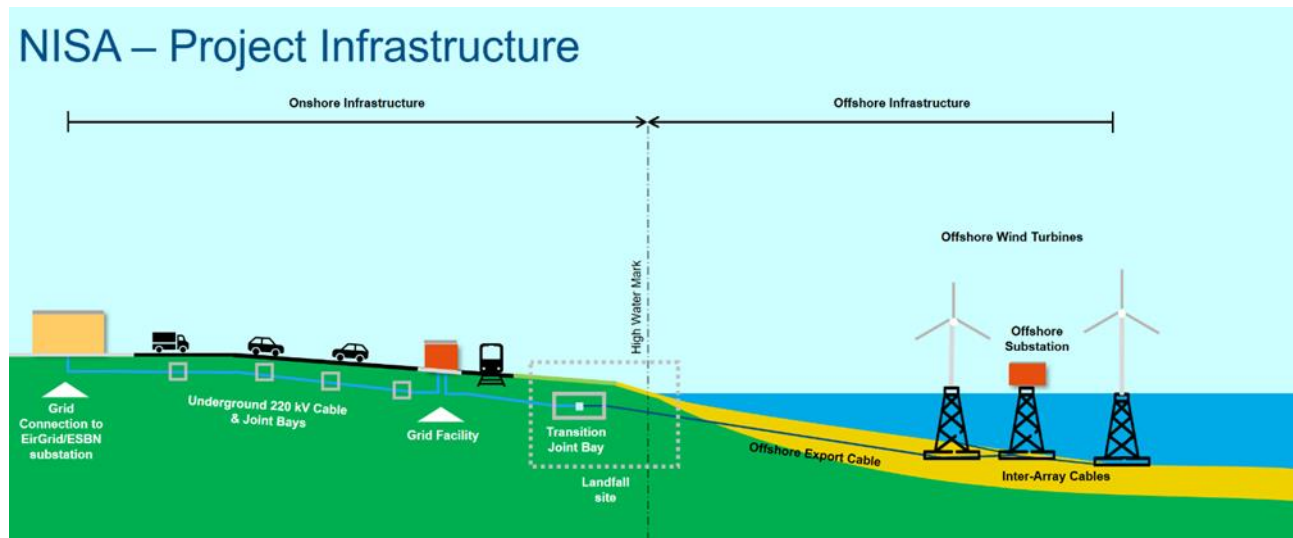


Figure A2.1 Infrastructure of the proposed development – not to scale (Source: Arup) (Replacing Figure 2.1 of the 2024 Planning Report)

There are no further changes to the section. Refer to Section 2.1 of the 2024 Planning Report.

### 2.2 Project Location

There is no change to the section. Refer to Section 2.2 of the 2024 Planning Report.

### 2.3 Profile of Applicant

#### 2.3.1 Introduction

There is no change to this section. Refer to Section 2.3.1 of the 2024 Planning Report.

#### 2.3.2 Statkraft Ireland Ltd

Minor changes to the profile of Statkraft Ireland Ltd have prompted changes to Section 2.3.2 of the 2024 Planning Report.

Therefore, the following text is deleted:

*“Statkraft is a global company in energy market operations. Statkraft has 5,700 employees in 21 countries.”*

And replaced with the following text:

Statkraft is a global company in energy market operations. Statkraft has more than 7,000 employees in over 20 countries.

There are no further changes required to this section. Refer to Section 2.3.2 of the 2024 Planning Report.

### 2.3.3 Copenhagen Infrastructure Partners P/S

**Since the submission of the 2024 Planning Report, the profile of Copenhagen Infrastructure Partners P/S (CIP) has been updated. Therefore, the entire Section 2.3.3 of the 2024 Planning Report shall be deleted and replaced with the text herein:**

Founded in 2012, Copenhagen Infrastructure Partners P/S (CIP) is a global fund manager and leading investor in energy infrastructure. CIP builds value that matters by developing and constructing critical infrastructure projects that shape the future of energy.

Through its funds, CIP invests in power generation (solar and wind), energy storage, transmission and distribution, advanced bioenergy, low-carbon fuels and carbon capture.

With 15 funds currently under management, CIP is trusted by over 200 of the world's largest and most sophisticated institutions, having raised EUR ~37 billion to date. CIP has projects in more than 30 countries, with presence on the ground through a network of +2,300 professionals.

CIP's project development activities are being led by CIP's development partner, Copenhagen Offshore Partners (COP). COP is a leading and experienced provider of project development, construction management, and operational management services to offshore wind projects.

## 2.4 Background to Project

**The timeframes associated with the RFI means that it is now unlikely that the development will be fully operational by 2030. Consequently, a change is required to the final paragraph in Section 2.4 of the 2024 Planning Report.**

**Therefore, the following text is deleted:**

*“The proposed development will provide a significant source of offshore renewable energy (ORE) off the east coast of Ireland. The proposed development, which can be fully operational before 2030, will deliver clean electricity to contribute to Ireland's renewable electricity and GHG reduction targets which are clear in supporting the challenge of cutting emissions quickly to ensure a safer and sustainable world for all.”*

**And replaced with the following text:**

The proposed development will provide a significant source of offshore renewable energy (ORE) off the east coast of Ireland. The proposed development, which is expected to be well advanced in the construction phase by 2030, will deliver clean electricity to contribute to Ireland's renewable electricity and GHG reduction targets, which are clear in supporting the challenge of cutting emissions quickly to ensure a safer and sustainable world for all.

**There are no further changes required to this section. Refer to Section 2.4 of the 2024 Planning Report.**

## 2.5 Community benefit Fund

There is no change to this section. Refer to Section 2.5 of the 2024 Planning Report.

## 2.6 Project Objectives

**In response to RFI Section 1 (b), a review of relevant policy documentation was undertaken. The change required to this section is the addition of a reference to the Hamburg Declaration. In January 2026, Ireland signed the Hamburg Declaration, which commits to a strong pipeline of offshore wind in the North Seas, with 100GW to be delivered in the coming years and 300GW by 2050, and as such creates a new key objective of the proposed development.**

**Therefore, in addition to the objectives of the proposed development listed in the 2024 Planning Report, the following objective shall be added at the end of the list in Section 2.6 the 2024 Planning Report:**

- Contributing to the ambitions of the Hamburg Declaration (2026) of which Ireland is a signatory of reaching 300GW of offshore wind capacity by 2050 within the North Seas

**In addition, since the submission of the 2024 Planning Report, the Climate Action Plan 2025 (CAP 25) has been published, so the change required to this section is the addition of a reference to the Climate Action Plan 2025.**

**Therefore, the following text is deleted:**

*“The proposed development is a pivotal component of the Programme for Government and the Climate Action Plan 2024 and reflects ambitions outlined in Offshore Renewable Energy Development Plan (ORED P) in 2014. In the absence of the proposed development, there is no plausible mechanism by which Ireland can meet binding climate and environmental targets for 2030 and beyond. With the urgency surrounding the climate crisis, it is imperative that these targets are achieved. As an essential contributor to achieving Ireland’s offshore wind commitments, the need for the proposed development is clear and demonstrable.”*

**And replaced with the following text:**

“The proposed development is a pivotal component of the Programme for Government and the Climate Action Plans 2024 and 2025<sup>1</sup>, and reflects ambitions outlined in Offshore Renewable Energy Development Plan (ORED P) in 2014. In the absence of the proposed development, there is no plausible mechanism by which Ireland can meet binding climate and environmental targets for 2030 and beyond. With the urgency surrounding the climate crisis, it is imperative that these targets are achieved. As an essential contributor to achieving Ireland’s offshore wind commitments, the need for the proposed development is clear and demonstrable.

**There are no further changes required to this section. Refer to Section 2.6 of the 2024 Planning Report.**

## **2.7 The Role of Renewable Energy**

### **2.7.1 Renewable Energy**

**In response to RFI Section 1 (b), a review of policy documentation relevant to the role of renewable energy was undertaken. The change required to this section is the addition of a reference to the Climate Action Plan 2025.**

**Therefore, the following text is deleted:**

*“The proposed development will deploy tried and tested offshore wind technology in the use of fixed foundations. In addition, having secured both a Maritime Area Consent (MAC)<sup>4</sup> and Offshore Renewable Energy Support Scheme (ORESS) contract, the proposed development is at the forefront of Ireland’s offshore wind energy industry. Once planning development permission is secured, the project can commence construction in 2026 and operations by 2030, ensuring the proposed development will provide renewable electricity to the national grid by 2030. The proposed development will make a significant contribution to the 5GW of offshore wind by 2030, which has been identified in CAP 2024 as essential to achieve the electricity GHG emissions sector ceiling.”*

**And replaced with the following text:**

CAP 25 builds upon Climate Action Plan 2024 (CAP 24) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. CAP 25 should be read in conjunction with CAP 24.

The CAP 25 strengthens Ireland’s pathway to deploying onshore and offshore wind, and reaffirms targets of 6 GW onshore by 2025, 9 GW by 2030, and at least 5 GW offshore by 2030. CAP 25 highlights strong wind generation performance, with wind supplying nearly 40% of electricity in early 2024 and continues support for wind generation through the Renewable Energy Support Scheme. CAP 25 also supports wind generation

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<sup>1</sup> Department of Climate, Energy and Environment, 2025. Climate Action Plan 2025 [DECC Climate Action Plan 2025 Main Report - Final Web.pdf](#) Access March 2026

through planning reforms, regional renewable capacity allocations, policies for repowering existing wind farms, and commitment to achieving a minimum 51% reduction of GHG by 2030 compared to 2018 levels.

With reference to the electricity sector, CAP 25 records that considerable progress that has been made in decarbonising the sector, which resulted in the reduction in electricity generation emissions of 22% in 2023<sup>2</sup>, against an increase in electricity demand (+3%). This reduction was due to an increase in both the use of indigenous renewable electricity generation sources (over 6 GW installed capacity by the end of 2023) and electricity imports, allowing for a reduction in fossil-based domestic generation. However, the EPA's Projections Report 2023-2050<sup>3</sup> indicates an overshoot of 2.5% of the carbon budget in the period 2021 to 2025, and an overshoot of over 25% of the budget in the second period 2026 to 2030. These are both significant improvements on the projected overshoots (13% and 43%, respectively) set out in the CAP 24.

The proposed development will deploy tried and tested offshore wind technology in the use of fixed foundations. In addition, having secured both a Maritime Area Consent (MAC)<sup>4</sup> and Offshore Renewable Energy Support Scheme (ORESS) contract, the proposed development is at the forefront of Ireland's offshore wind energy industry. Once planning development permission is secured, the project is expected to be well advanced in the construction phase by 2030, ensuring the proposed development will commence providing renewable electricity to the national grid. The proposed development will make a significant contribution to the 5GW of offshore wind, which has been identified in CAP 2024 and CAP 25 as essential to achieve the electricity GHG emissions sector ceiling.

**In April 2025, Sceirde Rocks announced that it will no longer be progressing with its proposed development. Sceirde Rocks was a successful ORESS 1 Phase 1 project, and its withdrawal emphasises the need for the remaining Phase One projects and ORESS contract holders to progress. To capture this change, the following text shall be added to Section 2.7.1 of the 2024 Planning Report:**

The proposed development was one of the four successful offshore wind farm developments awarded a contract through ORESS 1 and will subsequently deliver a large proportion of affordable renewable electricity to Irish consumers. Sceirde Rocks, one of the Phase One projects which was successful in ORESS 1 in June 2023, and with a proposed capacity of 450MW, announced in April 2025 that it will not be progressing with the development of its windfarm. The withdrawal of Sceirde Rocks, means that the capacity that can be delivered by the remaining three successful ORESS 1 contract holders reduces to 2.6GW. This in turn reduces the total Phase One capacity from 4.3GW to approximately 3.8GW, which is a significant shortfall against the 5GW target. This only further highlights the critical need to advance the remaining Phase One projects to ensure the security of the energy supply to Ireland in addition to supporting the delivery of affordable electricity for the consumer.

**In addition, in response to RFI Section 1 (b), a review of relevant datasets was undertaken. Since the submission of the 2024 Planning Report, Eurostat, the statistical office of the EU, has published a new set of Renewable Energy Statistics (2025), highlighting the need for each member state to intensify efforts to comply with the 2030 targets.**

**Therefore, the following text shall be added to the end of Section 2.7.1 of the 2024 Planning Report:**

The lowest shares of renewables in terms of gross final energy consumption within the EU in 2024 were recorded in Belgium (14.3%), Luxembourg (14.7%), and Ireland (16.1%).

EU Directive 2023/2413 on the promotion of the use of energy from renewable sources has revised upwards the EU's 2030 renewable energy target from 32% to 42.5% (with an aim to increase it to 45%).

Therefore, EU countries need to intensify their efforts to collectively comply with the EU target for 2030, which requires increasing the share of renewable energy sources.

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<sup>2</sup> Ibid page 69

<sup>3</sup> Ibid page 70

<sup>4</sup> the MAC is a State consent which allows the Developer the right to occupy a part of the maritime area and the ability to subsequently apply for development consent within that maritime area.

**There are no further changes required to this section. Refer to Section 2.7.1 of the 2024 Planning Report.**

### **2.7.2 Rising Demand for Electricity**

**In response to RFI Section 1 (b), a review of policy documentation relevant to the role of renewable energy was undertaken. The change required to this section is the addition of a reference to the CAP25. This presents an update on the measures established by CAP 24 in order to meet the challenge of network demand for electricity and re-emphasises the challenge the electricity sector faces.**

**The following text is added before the final paragraph in this section:**

In the CAP 25 Annex of Actions<sup>5</sup>, specific measures are also proposed under these three themes - accelerate renewable energy generation, accelerate flexibility and demand management.

CAP 25 highlights that although considerable progress has been made to decarbonise the electricity sector, it still faces an immense challenge in balancing a reduction in emissions and a growing electricity demand:

*“the electricity sector has one of the smallest carbon budgets, with a ceiling of 40 MtCO<sub>2</sub>eq. for the first budget period (2021–2025), equating to an average of 8 MtCO<sub>2</sub>eq. per annum and the steepest decline trajectory (-75%) across all sectors. This represents an immense challenge as the sector not only has a requirement to reduce emissions, but also to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification”.*

**There are no further changes required to this section. Refer to Section 2.7.2 of the 2024 Planning Report.**

### **2.7.3 Security of Supply**

**In response to RFI Section 1 (b), a review of relevant datasets was undertaken. Since the submission of the 2024 Planning Report, the SEAI has published the Energy in Ireland 2025 Report, which provides updated definitive data on Ireland’s energy supply, demand and related emissions. The data from this report provides a more recent depiction of Ireland’s security of supply than the data provided in SEAI’s Energy in Ireland Report 2023.**

**Therefore, the following text from Section 2.7.3 of the 2024 Planning Report shall be deleted:**

*“Energy security of supply is considered to be the uninterrupted availability of energy at an affordable price. The SEAI’s Energy in Ireland Report 2023 notes that Ireland imported 81.6% of its total primary energy requirement in 2022, whereas the average energy import dependency of all EU member states in 2020 was 57.5%. Ireland has a high energy import dependency because it imported all of its coal and oil products and 74% of its natural gas supplies. However, its import dependency on renewable energy is low, importing only 8.8% of renewable energy in 2022, most of which was biodiesel.*

*As the SEAI report also details. Ireland was highly dependent on fossil fuels in 2022. In that year, 85.8% of energy came from oil, natural gas, coal, and peat. In relation to renewables, 13% of Ireland’s energy requirement in 2022 came from renewables. The remaining 1.2% of energy came from the use of non-renewable wastes and imported electricity across international interconnectors. Ireland’s total energy demand in 2022 was 4.7% higher than in 2021, however, energy-related emissions were 1.7% lower.”*

**And replaced with the following text:**

Energy security of supply is considered to be the uninterrupted availability of energy at an affordable price.

Energy imports dependency is one of the simplest and most widely used indicators of a country’s energy security, with indigenous energy sources generally considered to be more secure than imported energy.

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<sup>5</sup> Department of Climate, Energy and Environment, 2025. Climate Action Plan 2025 Annex of Actions, page 23  
[DECC Climate Action Plan 2025 Annex of Actions - Final Web.pdf](#), accessed March 2026

The SEAI's Energy in Ireland Report 2025 notes that Ireland imported 79.5% of its total primary energy requirement in 2024, which is an increase from 78% in 2023.

According to Eurostat Energy in Europe 2026 Edition, the energy imports dependency rate in the EU was 57%, meaning Ireland is 22.5% above EU average. This overall trend reflects the fact that Ireland does not have significant indigenous fossil fuel resources and has only in recent years begun to harness significant quantities of renewables.

In 2024, 41.8% of Ireland's gross electricity supply came from natural gas, followed by 32.1% from wind generation, and 13.9% from the net-import of electricity from Northern Ireland and Great Britain. Combined these three sources accounted for 87.9% of Ireland's electricity supply. In total, fossil fuel generation accounted for 45.3% of the electricity supply in 2024 – the lowest level on record - with renewable generation accounting for 40.0% of electricity supply. Other sources, consisting of net-imports of electricity across international interconnectors and generation from non-renewable wastes, accounted for the remaining 14.8%. On a percentage basis, Ireland has never used more net-imported electricity.

**In light of recent and ongoing global geopolitical events, an additional paragraph has been added to further reaffirm the need for security of supply. Therefore, the following text shall be added to Section 2.7.3 of the 2024 Planning Report:**

Europe's energy system remains highly exposed to geopolitical instability, as a significant share of global oil and liquidised natural gas (LNG) supply transits key maritime chokepoints vulnerable to disruption. This causes uncertainty in both the supply and cost of energy. International assessments further highlight that such chokepoints expose the inherent vulnerability of global fuel markets, reinforcing the need for Europe to accelerate its shift towards secure, domestically generated clean energy (IEA, 2026). The proposed development will strengthen the domestic energy supply and reduce our dependency on the volatile international energy market.

**There are no further changes required to this section. Refer to Section 2.7.3 of the 2024 Planning Report.**

#### **2.7.4 The Need for Affordable Energy**

**As previously acknowledged Sceirde Rocks announced in April 2025 that it will no longer be progressing with its proposed development. Sceirde Rocks was a successful ORESS 1 Phase 1 project, and its withdrawal emphasises the need for the remaining Phase One projects and ORESS contract holders to progress in order to deliver affordable renewable electricity to Irish consumers. To capture this change, the following text shall be deleted from Section 2.7.4 of the 2024 Planning Report:**

*“The proposed development was one of the four successful offshore wind farm developments awarded a contract through ORESS 1 and will subsequently deliver a large proportion of affordable renewable electricity to Irish consumers”.*

**And replaced with:**

The proposed development was one of the four successful offshore wind farm developments awarded a contract through ORESS 1 and will subsequently deliver a large proportion of affordable renewable electricity to Irish consumers. As previously mentioned, Sceirde Rocks, which was one of the successful ORESS 1 project and had an anticipated capacity of 450MW, confirmed in April 2025 that it would not advance to construction. The discontinuation of this project has reduced the combined capacity of the remaining ORESS 1 developments to approximately 2.6GW. Consequently, overall Phase One offshore wind capacity has decreased from 4.3GW to roughly 3.8GW, leaving a material gap relative to the national target of 5GW.

This reduction in available capacity reinforces the importance of enabling the remaining Phase One projects to proceed without delay. In this context, the Proposed Development helps safeguard Ireland's energy security while underpinning the long-term supply of affordable, renewable electricity to consumers.

**In addition, in response to RFI Section 1 (b), a review of relevant datasets was undertaken, and since the submission of the 2024 Planning Report, recent analysis undertaken by Baringa for Wind Energy Ireland (WEI), published in “Good for your Pocket: How Renewable Energy Helps Irish Electricity Consumers” (2025), provides robust quantitative evidence demonstrating that continued renewable energy deployment is essential for consumer protection and energy security.**

**Therefore, the following text shall be added to the end of Section 2.7.4 of 2024 Planning Report.**

Independent analysis by Baringa for Wind Energy Ireland, published in the “Good for your Pocket: How Renewable Energy Helps Irish Consumers” (2025), shows that renewable energy deployment has already delivered €840 million in consumer savings by displacing higher-cost fossil-fuel generation. Achieving Ireland’s 80% renewable electricity target could provide a further €610 million in annual savings, demonstrating a clear economic need for continued renewable energy development.

Ireland currently spends €1 million per hour on imported fossil fuels, leaving consumers exposed to international price fluctuations. Renewable generation has reduced fossil-fuel spend by €7.4 billion since 2000, with wind energy responsible for 98% of the net consumer savings identified. The findings of this report demonstrate that additional large-scale wind capacity is essential in reducing electricity prices, meeting climate targets, and lowering fossil-fuel dependence. Given Ireland’s significant offshore wind potential and national policy commitments, offshore wind projects such as the proposed development is clearly aligned with the report’s conclusions on the need for wind deployment to lower consumer costs.

**There are no further changes required to this section. Refer to Section 2.7.4 of the 2024 Planning Report.**

## **2.8 Additional Project Benefits**

There is no change to the introductory text in this section. Refer to Section 2.8 of the 2024 Planning Report.

### **2.8.1 Socio-Economic Overview**

**Since the submission, the EU Blue Economy Report 2025 has been published, and its findings have been incorporated into this chapter.**

**Therefore, the following text shall be added to Section 2.8.1 of the 2024 Planning Report:**

Offshore wind is now one of the fastest-growing sectors in Europe’s blue economy, creating new jobs and supporting long-term economic growth. The EU Blue Economy Report 2025 shows that offshore wind has expanded by more than 1,000% since 2013, making it one of the strongest performers across all ocean-based industries. The sector now provides 18.9 GW of clean energy across the EU—enough to power over six million homes—and continues to attract significant investment each year. As part of this wider growth, the proposed development will support new employment opportunities, strengthen local supply chains, and contribute to Ireland’s participation in a rapidly expanding European clean-energy industry.

**There are no other changes required to this section. Refer to Section 2.8.1 of the 2024 Planning Report.**

## **2.9 Fulfilling Regional Demand**

There is no change to this section. Refer to Section 2.9 of the 2024 Planning Report.

### **2.9.1 Shaping Our Electricity Future**

There is no change to this section. Refer to Section 2.9.1 of the 2024 Planning Report.

### **2.9.2 Tomorrow’s Energy Scenario**

There is no change to this section. Refer to Section 2.9.2 of the 2024 Planning Report.

## **2.10 Summary of the Need for the Proposed Development**

**In response to RFI Section 1 (b), a change is required to this section of the 2024 Planning Report, to provide up to date data.**

**Therefore, the following text in the first paragraph is deleted:**

*“The proposed development will deliver a significant portion of the 5GW target for offshore renewable generation which is imperative for meeting the 2030 targets whilst improving energy security and reducing reliance on the costly import of energy. Without the proposed development, there is a real risk Ireland’s committed target of 5GW installed offshore wind capacity will not be met.”*

**And replaced with the following text:**

Once planning development permission is secured, the proposed development is expected to be well advanced in the construction phase by 2030, ensuring it will commence providing renewable electricity to the national grid and will make a significant contribution to the target of 5GW of offshore wind, whilst improving energy security and reducing reliance on the costly import of energy. Without the proposed development, there is a real risk Ireland’s committed target of 5GW installed offshore wind capacity will not be met.

**There are no further changes required to this section. Refer to Section 2.10 of the 2024 Planning Report.**

## **3. Legislative Requirements**

### **3.1 Overview**

**In response to RFI Section 1 (b), the change required to this section is the addition of a reference to the Planning and Development Act 2024.**

**Therefore, the following text is added at the end of the section:**

Following submission of the planning application to An Bord Pleanála on 7 June 2024, the Planning and Development Act 2024 (the "2024 Act") was signed into law on 17 October 2024.

Part 4 of the 2024 Act, which relates to development consents, has not yet been commenced. However, even where Part 4 of the 2024 Act has commenced, the transitional provisions of the 2024 Act (Section 186) make clear that the relevant provisions under the 2000 Act, under which this planning application was originally submitted, will continue to apply and have effect, notwithstanding any repeal. Consequently, there have been no relevant changes to the legislative requirements for the preparation of this EIAR.

**There are no further changes to the section. Refer to Section 3.1 of the 2024 Planning Report.**

### **3.2 Marine Area Consent (MAC)**

There is no change to this section. Refer to Section 3.2 of the 2024 Planning Report.

### **3.3 Pre-Application Consultations with An Bord Pleanála and Design Flexibility**

There is no change to this section. Refer to Section 3.3 of the 2024 Planning Report.

### **3.4 Development Consent application under Sections 291 and 293 of the Planning Acts**

**In response to RFI Section 1 (b), the change required to this section is the addition of a reference to the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025).**

**Therefore, the following text is added at the end of the section:**

Amendments to Section 291 have been made by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025). However, these amendments apply to applications

made to the Commission after 1 October 2025 and not to ones made before this date. Therefore, the provisions are not considered relevant to the subject application.

**There are no further changes to the section. Refer to Section 3.4 of the 2024 Planning Report.**

### **3.5 Requirement for EIA**

**While it is noted that new planning legislation has been commenced recently (including the Planning and Development Act 2024), there have been no relevant changes in terms of the legislative requirements for an EIA and the EIA process. Therefore, there are no changes required to this section. Refer to Section 3.5 of the 2024 Planning Report.**

### **3.6 Requirement for AA**

#### **3.6.1 Habitats Directive**

**There is no change to this section. Refer to Section 3.6.1 of the 2024 Planning Report.**

#### **3.6.2 Screening and Outcomes**

**In response to RFI Section 1 (b), the change required to this section is to note that the Supporting Information for Screening for Appropriate Assessment (SISAA) Report and the Natura Impact Statement (NIS) submitted to support the 2024 planning application have been updated in response to the RFI.**

**There are no further changes to the section. Refer to Section 3.6.2 of the 2024 Planning Report.**

### **3.7 Requirements for Water Framework Directive Assessment**

**In response to RFI Section 1 (b), the change required to this section is to note the preparation of an addendum to the Offshore Water Framework Directive Compliance Report (Appendix A11.1 of the Addendum to the EIAR) and an addendum to the Onshore Water Framework Directive Compliance Report (Appendix A22.1 of the Addendum to the EIAR).**

**There are no further changes to the section. Refer to Section 3.7 of the 2024 Planning Report.**

## **4. Non-Statutory Stakeholder Engagement**

**In response to RFI Section 1 (b), the change required to this section is to note that, following receipt of the RFI, the Developer has engaged further with prescribed bodies at the An Coimisiún Pleanála's behest. Details of the consultation undertaken in preparation of the Addendum to the EIAR is provided in the Appendix A1.2 of the Addendum to the EIAR.**

**There are no further changes to this section. Refer to Section 4 of the 2024 Planning Report.**

## **5. Planning History**

### **5.1 Introduction**

**There is no change to the introductory text of this section. Refer to Section 5.1 of the 2024 Planning Report.**

### 5.1.1 Landfall Site

In response to RFI Section 1 (b), a change is required to this section of the 2024 Planning Report, to provide up to date data.

Therefore, the following text in the first paragraph is deleted:

*“Iarnród Eireann have however been preparing to submit a Railway Order application to An Bord Pleanála for the DART+ Coastal North project, which would, if approved, intersect the Landfall site along the railway line. DART+ Coastal North proposes the electrification of the railway line from Malahide to Drogheda MacBride Station.”*

And replaced with the following text:

In August 2025, An Coimisiún Pleanála made a Railway Order (ABP-320164-24) for the Iarnród Eireann DART+ Coastal North project. This project is the electrification of the railway line from Malahide to Drogheda MacBride Station. The project will intersect the landfall site along the railway line.

There are no further changes to the section. Refer to Section 5.1.1 of the 2024 Planning Report.

### 5.1.2 Grid Facility

In response to RFI Sections 1 (b) and 13 (e), a change is required to this section of the 2024 Planning Report, to provide up to date data.

Therefore, the following text and figure are added to Section 5.1.2 of the 2024 Planning Report:

Fingal County Council adopted the Flemington Local Area Plan (LAP)<sup>6</sup> in December 2024. The LAP proposes the creation of residential and open space areas, active travel routes, community uses and active travel hubs on lands adjoining the southern boundary of the Grid Facility, to the west of the R132 road (refer to Figure A5.1).



Figure A5.1 NISA boundary in relation to the Flemington Local Area Plan

There are no further changes to the section. Refer to Section 5.1.2 of the 2024 Planning Report.

<sup>6</sup> [flemington\\_local\\_area\\_plan-2.pdf](#), accessed March 2026

### 5.1.3 Onshore Cable Route

**In response to RFI Sections 1 (b), a change is required to this section of the 2024 Planning Report, to provide up to date data.**

**Therefore, the following text is deleted:**

- *“Harry Reynold Road, Cycle and Pedestrian Route Project (PARTXI/001/20, permission granted Nov 2020): This scheme is predominantly located along Harry Reynolds Road and Hamilton Road in Balbriggan, Co Dublin and includes numerous measures to improve pedestrian and cyclist facilities in the area. This development is currently under construction.*
- *Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order (ABP- 314724-22, submitted Sept 2022): Potential interaction of this project and the proposed development at Estuary roundabout in Swords. This application is not yet decided.*
- *Greater Dublin Drainage Project (ABP-312131-22, submitted Dec 2021): Potential interaction of this project and the proposed development where the Greater Dublin Drainage Project would cross from East to West under the Malahide Road (R107), or the Drumnigh Road (R124).”*

**And replaced with the following text:**

- Harry Reynold Road, Cycle and Pedestrian Route Project (PARTXI/001/20): This scheme is predominantly located along Harry Reynolds Road and Hamilton Road in Balbriggan, Co Dublin and includes numerous measures to improve pedestrian and cyclist facilities in the area. This development was completed in March 2025.
- Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order (ABP- 314724-22): Potential interaction of this project and the proposed development at Estuary roundabout in Swords. In September 2025, An Coimisiún Pleanála made a Railway Order for the Metrolink project.
- Greater Dublin Drainage Project (ABP-312131-22): Potential interaction of this project and the proposed development where the Greater Dublin Drainage Project would cross from East to West under the Malahide Road (R107), or the Drumnigh Road (R124). In July 2025, An Coimisiún Pleanála granted permission for the Greater Dublin Drainage Project.
- Lissenhall Park & Ride facility (F25A/0710E): The development will consist of a Park & Ride facility with a total of 733 car parking spaces, three bus bays and provision for active travel with a hardstanding area for a bike shelter and lockers. Potential interaction of this project and the proposed development at Lissenhall Little, west of the M1- Junction 4. As part of the planning application, additional information was received by Fingal County Council (FCC) in February 2026. As of March 2026, a decision to grant permission was pending.
- Other relevant active travel plans which are at various stages of progression. For example, Sustainable Swords (R132 Connectivity Project), which was consented in 2022, with construction progressing since March 2026, and the Balrothery Active Travel Plan; launched on 14 April 2026, focusing on improving conditions within Balrothery, including the R132. Engagement will be ongoing between the Developer and FCC in relation to active travel schemes during the construction phase of the onshore cable route.

**The following sixth bullet point and text is added:**

- Destruction of structures, upgrades to roundabout, construction of roads and services infrastructure with all associated site works at Rowans Big, Rowans Little and Courtlough, Lusk and Balbriggan, Co. Dublin. (ABP-322429-25): Potential interaction of this project and the proposed development at the roundabout on the R132 road at Rowans Little. In August 2025, An Coimisiún Pleanála granted permission for the project, which had been appealed.

Recent planning applications and decisions in the vicinity of the onshore cable route are detailed and considered in the EIAR Cumulative Impact Assessment (see Addendum to Chapter 38 Cumulative and Inter-Related Effects of Volume 6 and Appendix A38.1 Stage 1 and 2 CEA of Volume 12 (Onshore and Wider Scheme)) submitted in support of this application.

**There are no further changes to the section. Refer to Section 5.1.3 of the 2024 Planning Report.**

### 5.1.4 Connection at Belcamp Substation

In response to RFI Sections 1 (b), a change is required to this section of the 2024 Planning Report, to provide up to date data.

The following text is deleted:

- “East Meath – North Dublin Grid Upgrade (ABP-319422-24): The proposed development consists of the installation of an underground cable circuit, approximately 37.5km in length, connecting Woodland Substation (400kV) in the townland of Woodland in County Meath, and Belcamp Substation (220kV) in the townlands of Clonshagh and Belcamp in Fingal. The application was submitted in April 2024 and subject to approval, construction is predicted to commence in Q2 2026 and finish in Q4 2029.”

And replaced with the following text:

- East Meath – North Dublin Grid Upgrade (ABP-319422-24): The proposed development consists of the installation of an underground cable circuit, approximately 37.5km in length, connecting Woodland Substation (400kV) in the townland of Woodland in County Meath, and Belcamp Substation (220kV) in the townlands of Clonshagh and Belcamp in Fingal. In February 2025, An Coimisiún Pleanála granted permission for the project. EirGrid’s website<sup>7</sup> indicates that the project is at “Stage 6 - Construction, energisation and benefit sharing”.

There are no further changes to the section. Refer to Section 5.1.4 of the 2024 Planning Report.

## 6. Planning and Policy Context

### 6.1 Introduction

In response to RFI Sections 1 (b), a change is required to this section of the 2024 Planning Report, to provide up to date data.

For the purposes of clarity, Table 6.1 from the 2024 Planning report shall be deleted and replaced with Table A6.1. The changes are highlighted in grey.

Table A6.1: Planning and Policy Documents (Replacing Table 6.1 of the 2024 Planning Report)

International Policy
United Nations Framework Convention on Climate Change
Kyoto Protocol
Paris Agreement
European Policy
European Marine Spatial Planning Directive (2014/89/EU)
Marine Strategy Framework Directive 2008/56/EC
Promotion of the use of energy from renewable sources Directive (EU) 2018/2001
Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999
The European Green Deal
2020 EU Strategy for Offshore Renewable Energy
European Climate Law Regulation 2021/1119
8th European Environmental Action Programme
Council Regulation (EU) 2022/2577
REPowerEU

<sup>7</sup> East Meath-North Dublin Grid Upgrade | Projects | EirGrid, accessed April 2026

European Directive 2023/2413
European Wind Power Action Plan
European Wind Charter
Nature Restoration Law (Regulation (EU) 2024/1991)
EU Updated Offshore Renewable Energy Ambition (2024)
Hamburg Declaration (2026)
<b>National Marine Area Policy</b>
Marine Planning Policy Statement
National Marine Planning Framework
<b>National Planning Policy and Guidance</b>
Offshore Renewable Energy Plan 2014
Offshore Renewable Energy Development Plan Interim Review May 2018
Future Framework for Offshore Renewable Energy Policy Statement (2024)
Future Framework 2025 Review
National Energy and Climate Plan 2021 – 2030
Climate Action and Low Carbon Development Acts 2015 to 2021
Climate Action Plan 2024 and 2025
Ireland’s Long-term Strategy on Greenhouse Gas Emissions Reduction
Project Ireland 2040: National Planning Framework (NPF)
First Revision of the National Planning Framework (2025)
National Development Plan
National Development Plan Review (2025)
Programme for Government: Securing Ireland’s Future (2025)
Powering Prosperity – Ireland’s Offshore Wind Industrial Strategy
The National Implementation Plan for the Sustainable Development Goals
Energy Security in Ireland to 2030
National Hydrogen Strategy
Draft Offshore Renewable Energy Future Framework Policy Statement
Policy Statement on the Framework for Ireland’s Offshore Electricity Transmission System
National Adaptation Framework (2024)
National Energy Demand Strategy (2024)
Accelerating Renewable Electricity Taskforce Implementation Plan (2024)
National Designated Maritime Area Plan for Offshore Renewable Energy Proposal (2025)
<b>Regional Policy</b>
Eastern and Midland Regional Spatial and Economic Strategy (RSES) 2019-2031
<b>Local Policy</b>
Fingal County Development Plan 2023-2029
Dublin City Development Plan 2022-2028
Meath County Development Plan 2021-2027
Louth County Development Plan 2021-2027
Lissenhall East Local Area Plan 2022

**There are no further changes to the section. Refer to Section 6.1 of the 2024 Planning Report.**

## **6.2 International**

There are no changes to this section. Refer to Section 6.2 of the 2024 Planning Report.

### **6.2.1 United Nations Framework Convention on Climate Change**

There are no changes to the section. Refer to Section 6.2.1 of the 2024 Planning Report.

### **6.2.2 Kyoto Protocol**

There are no changes to the section. Refer to Section 6.2.2 of the 2024 Planning Report.

### **6.2.3 Paris Agreement**

**In response to RFI Section 1 (b), the change required to this section is the addition of a reference to the Conference of Parties (COP) 29 and 30 which occurred in 2024 and 2025, respectively. Therefore, the following text is added to the penultimate paragraph of Section 6.2.3.**

In COP 29 Ireland again committed to meeting its €225m pledge by 2025, while publicly acknowledging the Baku finance package needs to be scaled further. In COP 30 Ireland supported the decision by the European Union to accept the COP30 Presidency text.

Although it was acknowledged that it falls short of reducing emissions to mitigate the worst effects of climate change and does not include a roadmap for the phase-out of fossil fuels, the minister indicated that Ireland looks forward to continuing work, outside of the COP process, with the EU and other international partners on shaping a roadmap for the energy transition and the phase-out of fossil fuels.

**There are no further changes to the section. Refer to Section 6.2.3 of the 2024 Planning Report.**

## **6.3 European**

### **6.3.1 European Marine Spatial Planning Directive (2014/89/EU)**

There are no changes to the introductory text. Refer to Section 6.3.1 of the 2024 Planning Report.

### **6.3.2 Marine Strategy Framework Directive 2008/56/EC**

There are no changes to the section. Refer to Section 6.3.2 of the 2024 Planning Report.

### **6.3.3 Promotion of the use of energy from renewable sources Directive (EU) 2018/2001**

There are no changes to the section. Refer to Section 6.3.3 of the 2024 Planning Report.

### **6.3.4 Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999**

There are no changes to the section. Refer to Section 6.3.4 of the 2024 Planning Report.

### **6.3.5 The European Green Deal**

There are no changes to the section. Refer to Section 6.3.5 of the 2024 Planning Report.

### **6.3.6 2020 EU Strategy for Offshore Renewable Energy**

There are no changes to the section. Refer to Section 6.3.6 of the 2024 Planning Report.

### **6.3.7 European Climate Law Regulation 2021/1119**

There are no changes to the section. Refer to Section 6.3.7 of the 2024 Planning Report.

### 6.3.8 8<sup>th</sup> European Environmental Action Programme

There are no changes to the section. Refer to Section 6.3.8 of the 2024 Planning Report.

### 6.3.9 Council Regulation (EU) 2022/2577

There are no changes to the section. Refer to Section 6.3.9 of the 2024 Planning Report.

### 6.3.10 REPowerEU

There are no changes to the section. Refer to Section 6.3.10 of the 2024 Planning Report.

### 6.3.11 European Directive 2023/2413

**In response to RFI Section 1 (b), the change required to this section is the addition of reference to S.I. No. 274 of 2025 (Planning and Development) (Renewable Energy) Regulations 2025. Therefore, the following text is added to the end of Section 6.3.11.**

The majority of the provisions of the Renewable Energy Directive III (EU/2023/2413) have now been transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) (the “Renewable Energy Regulations”) with the majority of the provisions coming into effect on 7 August 2025.

The Renewable Energy Regulations amended both the Planning and Development Act, 2000 (as amended) (the “Planning Act”) and the Planning and Development Regulations 2001 (as amended) (the “Planning Regulations”). Amendments to Section 291 of the Planning Act are addressed in Section 3.4 of this report.

**There are no further changes to this section. Refer to Section 6.3.11 of the 2024 Planning Report.**

### 6.3.12 European Wind Power Action Plan

There are no changes to the section. Refer to Section 6.3.12 of the 2024 Planning Report.

### 6.3.13 European Wind Charter

There are no changes to the section. Refer to Section 6.3.13 of the 2024 Planning Report.

### 6.3.14 Nature Restoration Law (Regulation (EU) 2024/1991)

**In response to RFI Section 1 (b), this new section has been added:**

The Nature Restoration Law (EU 2024/1991) was published in the Official Journal of the European Union on 24 July 2024. The Nature Restoration Law introduces legally binding targets for restoring degraded ecosystems, including marine environments. It mandates EU member states to implement restoration measures that enhance biodiversity and climate resilience.

In providing a source of renewable energy in an effort to tackle rising global temperatures, the proposed development will indirectly support the objectives of the Nature Restoration Law.

### 6.3.15 EU Updated Offshore Renewable Energy Ambition

**In response to RFI Section 1 (b), this new section has been added:**

In December 2024 EU Member States agreed on a new collective ambition for offshore renewable energy deployment across the EU’s five sea basins. The updated, non-binding targets include:

- A combined goal of 88 GW of offshore renewable capacity by 2030; and
- A combined goal of 360 GW by 2050.

This renewed ambition reflects the continued importance that Member States place on offshore renewables for EU energy security, decarbonisation, and the clean energy transition.

The proposed development will contribute significantly to the generation of renewable energy, facilitating future success in meeting EU climate targets.

### 6.3.16 Hamburg Declaration

**In response to RFI Section 1 (b), this new section has been added:**

In January 2026, Ireland signed the Hamburg Declaration, which commits to a strong pipeline of offshore wind in the North Seas (which includes the Irish Sea), with 100GW to be delivered in the coming years and 300GW by 2050.

Contributing to the ambitions of the Hamburg Declaration is a new key objective of the proposed development.

## 6.4 National Marine Area Policy

### 6.4.1 Marine Planning Policy Statement

There are no changes to the section. Refer to Section 6.4.1 of the 2024 Planning Report.

### 6.4.2 National Marine Planning Framework

**In response to RFI Section 3, the National Marine Planning Framework (NMPF) Compliance Report, submitted to support the 2024 application, has been amended. The location of this document in Appendix D of this report is also corrected. Therefore, the following text is deleted:**

*“An Bord Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the NMPF.*

*Further information on the proposed development’s compliance with the NMPF and the embedded policy points is provided in Appendix 3.1 of Volume 8.”*

**And replaced with:**

An Coimisiún Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the NMPF. Further information on the proposed development’s compliance with the NMPF and the embedded policy points is provided in the update to the National Marine Planning Framework: Compliance Document, which is included as Appendix D to this report.

**There are no further changes to the section. Refer to Section 6.4.2 of the 2024 Planning Report.**

## 6.5 National Planning Policy and Guidance

### 6.5.1 Offshore Renewable Energy Development Plan

#### 6.5.1.1 Offshore Renewable Energy Plan 2014

There are no changes to the section. Refer to Section 6.5.1.1 of the 2024 Planning Report.

#### 6.5.1.2 Offshore Renewable Energy Development Plan Interim Review May 2018

There are no changes to the section. Refer to Section 6.5.1.2 of the 2024 Planning Report.

### 6.5.2 Climate Action Policy

#### 6.5.2.1 National Energy and Climate Plan 2021 – 2030

**In response to RFI Section 1 (b), the change required to this section reflects an update to the National Energy and Climate Plan 2021 – 2030 which was revised in July 2024 to align with the Climate Act 2021 and Climate Action Plan 2024. Therefore, Section 6.5.2.1 is deleted in its entirety and replaced with the following:**

It is a requirement of Regulation (EU) 2018/1999 for all member states to establish integrated 10-year National Energy and Climate Plans (NECP). This collates the policies, measures and actions related to energy and climate outlined in a range of government plans: such as the Climate Action Plan, the National

Development Plan, and Project Ireland 2040, into one cohesive document. It also presents modelling that illustrates Ireland's current trajectories toward its three main European targets.

The NECP 2021 – 2030 was published in 2019 to comply with the requirement of Regulation (EU) 2018/1999 to fulfil this obligation and committed Ireland to decarbonising the economy by establishing sectoral roadmaps. A draft update of the NECP was submitted to the European Commission in December 2023.

An updated draft was submitted to the European Commission in July 2024. It outlines the department's energy and climate policies in detail for the period from 2021 to 2030 and looks onwards to 2050. This draft also incorporates the Commission's feedback on the 2023 draft, as well as feedback from two consultations.

The NECP reflects the ambitions set out in Climate Action Plan 2024. Whereas the Climate Action Plan is updated to reflect new policies and measures to increase Ireland's ambitions in pursuing energy and climate targets, the NECP acts more as a collation of existing policies and an analysis of how Ireland is performing relative to EU-wide targets, including projections on how Ireland expects to perform in future years based on current trajectories. The NECP will act to identify gaps and areas that Ireland can improve on, which should be reflected in updated policies and measures in subsequent Climate Action Plans.

The NECP 2021-2030 indicates that Ireland has established an ambitious and challenging target of increasing the percentage of electricity generated from renewable sources from around 40% to 80% (annual average) by 2030, and a target for offshore renewable energy (ORE) of at least 5GW by 2030.

The proposed development will directly align with the objectives of the NECP 2021-2030 by providing a significant source of renewable energy to meet the Irish targets for offshore renewable energy generation.

#### *6.5.2.2 Climate Action and Low Carbon Development Acts 2015 to 2021*

**In response to RFI Section 1 (b), a short section of text has been added at the end of Section 6.5.2.2 to reference the Supreme Court decision in the Coolglass Wind Farm Ltd v An Bord Pleanala case. Therefore, the following text is added to the end of Section 6.5.2.2:**

The Supreme Court Coolglass Wind Farm Ltd v An Bord Pleanala case reinforces the requirements of section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended). Section 15(1) requires relevant bodies to perform their functions in a manner consistent with the most recent approved climate action plans, national long-term climate action strategies and the national climate objectives.

**There are no further changes to the section. Refer to Section 6.5.2.2 of the 2024 Planning Report.**

#### *6.5.2.3 Climate Action Plan 2024 and 2025*

**In response to RFI Section 1 (b), the change required is the addition of a reference to the Climate Action Plan 2025. Therefore, the section heading has been updated, and the following text is added to the end of Section 6.5.2.3:**

The Climate Action Plan 2025 (CAP25) strengthens Ireland's pathway to deploying onshore and offshore wind, reaffirming targets of 6 GW onshore by the end of 2025, scaling up to 9 GW by 2030, and at least 5 GW offshore by 2030. CAP25 highlights strong wind generation performance, with wind supplying nearly 40% of electricity in early 2024 and continues support through the Renewable Energy Support Scheme. CAP25 continues to support wind generation through planning reforms, regional renewable capacity allocations, and policies for repowering existing wind farms, and commitment to achieving a minimum 51% reduction of GHG by 2030 compared to 2018 levels. Grid development, system flexibility, and marine planning are presented as essential enablers to accelerate wind deployment and meet national emissions targets.

**There are no further changes to this section. Refer to Section 6.5.2.3 of the 2024 Planning Report.**

#### *6.5.2.4 Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction*

There are no changes to the section. Refer to Section 6.5.2.4 of the 2024 Planning Report.

### 6.5.3 Project Ireland 2040: National Planning Framework

**In response to RFI Section 1 (b), the change required to this section reflects the First Revision of the National Planning Framework which was published in 2025. Therefore, Section 6.5.3 is deleted and replaced in its entirety with the following:**

The National Planning Framework (NPF) is the overarching policy and planning framework for the social, economic, and cultural development of the Country. Together with the National Development Plan (NDP), the two policies present one vision – Project Ireland 2040, meaning that implementation of the NPF is fully supported by the Government’s investment strategy for public capital investment and investment by the State sector in general.

Project Ireland 2040: NPF and the NDP 2018 – 2027 were published in 2018 and together set out a number of National Strategic Outcomes to support the OREDP. In 2021 a revised NDP was published to guide economic growth from 2021-2030. In April 2025, the First Revision of the NPF was published which focuses on resource efficiency and transition to a climate neutral economy.

The First Revision NPF has included new policies in relation to renewable energy development. The NPF also acknowledges the clear link between climate action and the potential for investment generation and employment and jobs, including in connection with the offshore wind industry and green technology.

There are ten National Strategic Outcomes (NSO) in the NDP. NSO 8 is the ‘Transition to a Carbon Neutral and Climate Resilient Society’. The Climate Action and Low Carbon Development (Amendment) Act commitments will shape investment choices over the coming decades in line with the National Climate Action Plan 2024 and the National Adaptation Framework.

New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

The proposed development will support this NSO as it supports the growth and integration of low carbon and renewable energy.

Offshore renewable energy is specifically addressed in Chapter 7 of the NPF, Realising Our Island and Marine Potential:

*“Offshore renewable energy represents an emerging sectoral opportunity for coastal regions with the potential to support the delivery of Ireland’s offshore wind ambitions being a particular economic development opportunity”*

In addition, National Policy Objective (NPO) 55 states:

*“To support, the progressive development of Ireland’s offshore renewable energy potential, the sustainable development of enabling onshore and offshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects”*

National Policy Objective 70 states:

*“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.”*

And finally National Policy Objective 71 states:

*“Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development”.*

The proposed development will help to achieve the objectives of the NPF by sustainably capturing a portion of Ireland’s offshore renewable energy potential and supporting the Irish transition to a low carbon energy system.

#### 6.5.4 National Development Plan

**In response to RFI Section 1 (b), the change required is to address the review of the NDP in 2025. Therefore, the following text is added after the penultimate paragraph of Section 6.5.4:**

The NDP Review 2025, published on 22 July 2025, builds on the NDP 2021–2030 and aligns with the NPF and Project Ireland 2040, ensuring balanced regional development and sustainable long-term planning. The government has prioritised increased investment levels in water, energy, transport and housing. The updated NDP features annual sectoral capital allocations from 2026 to 2030, and overall capital expenditure ceilings to 2035. This leads to a total investment of €275.4 billion over the period to 2035. Specifically, €3.5 billion in equity funding is being provided to ESB and EirGrid in 2025 to fund enhanced energy grid capacity to support the Government’s housing and competitiveness objectives.

**There are no further changes to the section. Refer to Section 6.5.4 of the 2024 Planning Report.**

#### 6.5.5 Programme for Government: Securing Ireland’s Future

**In response to RFI Section 1 (b), the change required is to reflect the new programme for government published in 2025. Therefore, the title to the section has changed, and Section 6.5.5 is deleted and replaced in its entirety with the following:**

The current Irish Government, formed in 2025, published its Programme for Government: Securing Ireland’s Future<sup>8</sup>, which was published in January 2025.

The purpose of the Programme for Government is to provide a clear indication of the objectives and policies which the Government proposes to pursue over its 5-year term of office.

The Programme for Government commits to achieving 80% of Ireland’s electricity generation from renewable source. To reach this goal, the Government will establish a clear regulatory pathway, enable network upgrades, improve port facilities, and ensure a dependable schedule of renewable energy auctions. The Government is focused on ensuring that local communities benefit from Ireland’s renewable potential, with job creation, community ownership, and tangible economic returns.

The Government recognises that delivery of essential infrastructure is a key driver in attracting and retaining investment in Ireland, growing our economy, fostering regional development, delivering on our housing targets and achieving our ambitious climate goals.

The Programme for Government also states that the Government will deliver at least 5GW capacity in offshore wind by 2030. The proposed development will directly contribute towards Ireland meeting its offshore renewable energy targets which directly align with the aims of the Programme for Government.

#### 6.5.6 Powering Prosperity – Ireland’s Offshore Wind Industrial Strategy

There are no changes to the section. Refer to Section 6.5.6 of the 2024 Planning Report.

#### 6.5.7 The National Implementation Plan for the Sustainable Development Goals

**In response to RFI Section 1 (b), the change required is an update to National Implementation Plan for the Sustainable Development Goals. Therefore, the following text is added to the end of Section 6.5.7:**

The Irish government has begun to prepare Ireland’s third Sustainable Development Goals National Implementation Plan. A public consultation ran from 2 December 2025 to 16 January 2026 to inform the new plan. The Department of Climate, Energy and the Environment confirms that implementation of the 2022–2024 National Implementation Plan is ongoing while the third National Implementation Plan is being prepared.

**There are no further changes to this section. Refer to Section 6.5.7 of the 2024 Planning Report.**

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<sup>8</sup> [Programme for Government 2025 - Securing Ireland's Future](#), accessed March 2026.

### 6.5.8 Energy Security in Ireland to 2030

There are no changes to the section. Refer to Section 6.5.8 of the 2024 Planning Report.

### 6.5.9 National Hydrogen Strategy

There are no changes to the section. Refer to Section 6.5.9 of the 2024 Planning Report.

### 6.5.10 Offshore Renewable Energy Future Framework Policy Statement

**In response to RFI Section 1 (b), the change required in this section is to update the Future Framework for Offshore Renewable Energy Policy Statement from “draft” to “final”. Therefore, the title of the Section 6.5.10 is updated to remove “draft” and the text in the section is deleted in its entirety and replaced with the following:**

The Future Framework for Offshore Renewable Energy, published in May 2024, is an over-arching future framework for the development of offshore wind in Ireland’s territorial seawaters and exclusive economic zone (EEZ). This framework aims to deliver 20GW of ORE by 2040 and at least 37GW in total by 2050.

The Future Framework Policy Statement identifies 21 key actions to facilitate a long term and structured approach for the delivery of the ORE targets, to maximise the economic benefits to the State.

These objectives are crucial for the decarbonisation of Ireland’s economy, the delivery of long-term energy security and the development of green industrial opportunities for offshore renewable energy. The proposed development is a fixed bottom foundation offshore wind farm. Once planning development permission is secured, the project is expected to be well advanced in the construction phase by 2030, ensuring the proposed development will commence providing renewable electricity to the national grid. It will facilitate the achievement of the targets in the Future Framework Policy Statement, which in turn will support the 37GW target of ORE by 2050.

A component of the Future Framework Policy Statement is a built-in annual review process to ensure consistency with Ireland’s evolving ORE sector and to reaffirm Government's commitment to energy targets. The Future Framework 2025 Review, published in May 2025 captures ORE sectoral progress in 2024/2025 on each of the 29 actions under the Future Framework as well as an updated action plan for 2026.

### 6.5.11 Policy Statement on the Framework for Ireland’s Offshore Electricity Transmission System

There are no changes to the section. Refer to Section 6.5.11 of the 2024 Planning Report.

### 6.5.12 National Adaptation Framework 2024

**In response to RFI Section 1 (b), this new section has been added as the National Adaptation Framework was published in June 2024 at the time the planning application was submitted:**

The National Adaptation Framework (NAF) 2024 was published in June 2024. The NAF aims to create a unified approach involving both government and society to adapt to climate change. It outlines how various sectors of society and local authorities can implement adaptation measures to minimise Ireland's vulnerability to climate change's adverse effects while taking advantage of any beneficial impacts. The NAF emphasises the importance of integrating adaptation strategies into all levels of policy making, infrastructure development, and local planning. Government ministers are required to prepare adaptation plans for sectors that are assigned to them in accordance with their obligations under the Climate Act and the NAF. The NAF imposes obligations on government ministers and local authorities to develop a plan for climate change adaptation.

The proposed development aligns with the NAF, as it will have a net significant beneficial impact on climate during its life cycle, assisting Ireland in achieving carbon neutrality by 2050.

### 6.5.13 National Energy Demand Strategy

**In response to RFI Section 1 (b), this new section has been added as the National Energy Demand Strategy was published after the planning application was submitted in 2024:**

The National Energy Demand Strategy (NEDS) was published by the Commission for Regulation of Utilities in July 2024. The Strategy outlines how Ireland will manage rising electricity and gas demand while staying within carbon emissions ceilings and expanding demand flexibility.

The Strategy aims to enable energy users to shift or reduce usage, by creating a more adaptable system that can better integrate variable offshore renewable generation. The Strategy focuses on establishing structured pathways for new large energy connections to support efficient use of future offshore wind capacity. Overall, the NEDS underpins Ireland's offshore renewable ambitions by ensuring the energy system can absorb and optimise growing volumes of clean offshore power.

#### 6.5.14 Accelerating Renewable Electricity Taskforce Implementation Plan

**In response to RFI Section 1 (b), this new section has been added as the plan was published after the planning application was submitted in 2024:**

The establishment of an Accelerating Renewable Electricity (ARE) Taskforce is a key measure in the Climate Action Plan 2023 (CAP23). The role of the ARE Taskforce is to coordinate the fast-tracked and increased deployment of onshore renewable electricity generation and supporting technologies.

The membership of the ARE Taskforce comprises senior representatives from key government departments and state bodies with responsibilities related to the delivery of renewable electricity generation projects.

They include the Department of Climate, Energy and the Environment, the Department of Housing, Local Government and Heritage, Commission for Regulation of Utilities, EirGrid, ESB Networks, Sustainable Energy Authority Ireland, the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, the Department of Enterprise, Tourism and Employment, Ireland Strategic Investment Fund and New Economy and Recovery Authority.

The key outputs of the Taskforce include:

- The development of an Accelerating Renewables Programme of Work that identifies priority areas to achieving renewable energy targets that aligns with the actions and KPIs set out in CAP23 and subsequent CAPs;
- A report on the investment required to support the renewables programme including identification of consumer impacts and cost mitigations as well as the investment outlook for the sector;
- The development of an Annual Summary Report on Progress towards Achieving our Renewables Goals;
- Identification of priority measures and actions, supported by data and modelling for accelerating renewable electricity generation, and related flexibility measures, in the next update of the Climate Action Plan; and
- Effective management of the Accelerating Renewables Programme of Work, support cross-agency and Department delivery, identifying gaps and mitigation measures, as required.

Ireland's Accelerating Renewable Electricity Taskforce Implementation Plan was published in June 2024. The Plan outlines actions designed to increase onshore renewable electricity deployment and support the national target of generating 80% of electricity from renewable sources by 2030. It is structured around three pillars, including:

- Planning and reporting;
- Grid and storage; and
- Route to market.

The Plan defines nine specialised working groups divided evenly between the three pillars, comprising representatives from government departments, state agencies, semi-state bodies, regulatory bodies, amongst others. It is the responsibility of the working groups to ensure coordinated delivery of the implementation plan across government and state agencies. Actions include planning and permitting reforms aligned with EU directives, updated wind energy guidelines, land identification for renewable deployment, accelerated grid

development, streamlined grid connection processes, and the rollout of a national electricity storage policy framework.

Broader objectives of the plan include removing barriers to early project delivery, reducing electricity costs, ensuring energy security, and strengthening market signals for renewable investment through competitive auctions and diversified routes to market.

#### 6.5.15 National Designated Maritime Area Plan for Offshore Renewable Energy Proposal

**In response to RFI Section 1 (b), this new section has been added as this plan was published after the planning application was submitted in 2024:**

A proposal for the development of a National Designated Maritime Area Plan (DMAP) for ORE was published in September 2025. This is a national level spatial planning policy framework intended to designate sufficient maritime area to deliver 20GW of offshore renewable energy by 2040, in accordance with Part 2 of the Maritime Area Planning Act 2021.

The DMAP will provide policy objectives, some of which will be unique to the specific classes of ORE and will include spatial designations where relevant. The National ORE DMAP will be prepared over 2025–2027, with completion of strategic environmental assessment, appropriate assessment and public consultation. The National DMAP will apply the extensive policy framework provided for in the NMPF and will take into account existing, permitted or planned ORE taking place in the maritime area.

In this way, the National DMAP will enable an alignment of existing energy policy and activities with forward spatial planning.

The South Coast DMAP (SC-DMAP) was made by the Minister for the Environment, Climate and Communications on 24 October 2024. The Plan identifies four maritime areas in the Irish part of the Celtic Sea within which proposed future ORE projects may be located. One of these four maritime areas, known as Tonn Nua or Maritime Area A, is identified to be developed by the winner of Ireland's second offshore wind auction, and will aim for deployment by 2030 or as soon as feasible thereafter. The SC-DMAP does not cover the Irish Sea.

## 6.6 Regional

### 6.6.1 EMRA Regional Spatial & Economic Strategy 2019-2031

There are no changes to the section. Refer to Section 6.6.1 of the 2024 Planning Report.

## 6.7 Local

### 6.7.1 County Development Plans

There are no changes to the section. Refer to Section 6.7.1 of the 2024 Planning Report.

#### 6.7.1.1 Fingal Development Plan 2023-2029

**In response to RFI Section 1 (b), the change to this section is the update to the Balbriggan Rejuvenation Plan which was published after the planning application was submitted in 2024.**

**There the following text from Section 6.7.1.1 from the 2024 Planning Report is deleted:**

***“Our Balbriggan Rejuvenation Plan 2019-2025***

*The onshore cable of the proposed development will be routed through the town of Balbriggan.*

*FCC prepared the Our Balbriggan Rejuvenation Plan 2019-2025<sup>55</sup>. This plan includes a number of initiatives and funded projects proposed to rejuvenate Balbriggan town. Those of relevance to the proposed development included the proposed Bremore Regional Park (located to the south of the proposed development) (under construction) and the Fingal Coastal Way (which will run parallel to the rail line within the proposed development landfall area (at Emerging Preferred Route stage, planning application*

2024) and Harry Reynolds Pedestrian and Cycle Scheme. Engagement is ongoing between the Developer and FCC in relation to the above projects.”

**And replaced with:**

### ***Our Balbriggan Town Rejuvenation Plan 2025-2030***

The onshore cable of the proposed development will be routed through the town of Balbriggan.

The Balbriggan Town Rejuvenation Plan 2025–2030 (“Our Balbriggan”) is Fingal County Council’s long-term regeneration framework for the town, extending and updating the original 2019–2025 plan following a formal progress review. The extended plan aligns regeneration objectives with ongoing public investment programmes and confirms a continued commitment to town-centre, harbour and community renewal. The projects of relevance to the proposed development include the proposed Bremore Regional Park (located to the south of the proposed development), the Fingal Coastal Way (which will run parallel to the rail line within the proposed development landfall area (at Emerging Preferred Route stage), (planning application 2024) and Harry Reynolds Pedestrian and Cycle Scheme. Engagement is ongoing between the Developer and FCC in relation to the above projects.

#### ***6.7.1.2 Dublin City Council Development Plan 2022-2028***

There are no changes to the section. Refer to Section 6.7.1.2 of the 2024 Planning Report.

#### ***6.7.1.3 Meath County Development Plan 2021-2027***

There are no changes to the section. Refer to Section 6.7.1.3 of the 2024 Planning Report.

#### ***6.7.1.4 Louth County Development Plan 2021-2027***

There are no changes to the section. Refer to Section 6.7.1.4 of the 2024 Planning Report.

### ***6.7.2 Local Area Plans***

There are no changes to the introductory text in this section. Refer to Section 6.7.2 of the 2024 Planning Report.

#### ***6.7.2.1 Lissenhall East Local Area Plan 2022***

There are no changes to the section. Refer to Section 6.7.2.1 of the 2024 Planning Report.

#### ***6.7.2.2 Kinsaley Local Area Plan***

There are no changes to the section. Refer to Section 6.7.2.2 of the 2024 Planning Report.

#### ***6.7.2.3 Flemington Local Area Plan***

**RFI Section 13 (e) requests the Developer review the Flemington LAP and update the submitted application documentation. In response to this the following text is deleted:**

*“FCC has published for consultation an issues paper for a draft LAP for the land adjacent to Flemington Lane, immediately south of the lands on which the grid facility will be located. However, there is insufficient information to assess the proposed development’s compliance with the objectives of the Flemington LAP at this time.”*

**And replaced with the following text:**

The Flemington Local Area Plan was adopted by Fingal County Council in December 2024. The lands included within the LAP are adjacent to the grid facility boundaries along the southern extents.

The LAP is based off Flemington Lane in north Balbriggan, comprising agricultural lands measuring a total area of c.17.2 hectares. The Flemington Local Area Plan provides the land use framework to guide development on the lands. Within the Fingal Development Plan 2023-2029, the identified lands are situated within the Balbriggan development boundary and are subject to the ‘Residential Area’ (RA) zoning objective.

The Vision Statement for the LAP is as follows:

*“The shared vision for Flemington is to promote the sustainable development of the LAP lands at a level that is appropriate for the existing local context through the delivery of a new residential neighbourhood that will offer a variety of new homes and a quality place to live. The new residential neighbourhood will be supported by community facilities, high quality public open space and active travel measures that will meet the needs of the future population in the area and generate a strong sense of community.”*

The LAP includes environmental and sustainability objectives built on low carbon energy, including renewable energy. The proposed development aligns with the objectives of the LAP by providing a large source of low carbon energy to the region.

**There are no further changes to the section. Refer to Section 6.7.2.3 of the 2024 Planning Report.**

## **6.8 Conclusion**

**In response to RFI Sections 1 (b), a change is required to this section of the 2024 Planning Report to provide up to date data.**

**The following text in the second paragraph is deleted:**

*“As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables by 2030, thus contributing also to achieving the relevant EU objectives and targets (111GW of offshore wind deployment across Europe by 2030).”*

**And replaced with the following text:**

Once planning development permission is secured, the project is expected to be well advanced in the construction phase by 2030, ensuring the proposed development will commence providing renewable electricity to the national grid. As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables, thus contributing also to the relevant EU objectives and targets.

**There are no further changes to the section. Refer to Section 6.8 of the 2024 Planning Report.**

# **7. Planning Conclusions**

## **7.1 Legislative Compliance**

**In response to RFI Section 1 (b), the change required to this section is to note the preparation of addenda to the following documents, which were submitted to support the 2024 planning application:**

- **National Marine Planning Framework: Compliance Document**
- **EIAR**
- **SISAA**
- **NIS**

**There are no further changes to the section. Refer to Section 7.1 of the 2024 Planning Report.**

## **7.2 Policy Compliance**

**In response to RFI Section 1 (b), the change required to this section is to confirm that the proposed development supports and is key to the delivery of the objectives, in relation to the production of renewable energy, of the policies and plans, which have been issued since the 2024 planning**

**submission. To provide up to date data, in the second paragraph of Section 7.2, the following text is deleted:**

*“As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables by 2030, thus contributing also to achieving the relevant EU objectives and targets, such as 111GW of offshore wind deployment across Europe by 2030.”*

**And replaced with the following text:**

Once planning development permission is secured, the project is expected to be well advanced in the construction phase by 2030, ensuring the proposed development will commence providing renewable electricity to the national grid. As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables, thus contributing also to the relevant EU objectives and targets.

**There are no further changes to the section. Refer to Section 7.2 of the 2024 Planning Report.**

### **7.3 Conclusions of the EIAR**

**In response to RFI Section 1 (b), the change required to this section is to note the preparation of the Addendum to the 2024 EIAR.**

**There are no further changes to the section, and the conclusions of the Addendum to the EIAR remain as stated in the section. Refer to Section 7.3 of the 2024 Planning Report.**

### **7.4 Conclusions of NIS**

**In response to RFI Section 1 (b), the change required to this section is to note the preparation of the Addendum to the 2024 NIS.**

**There are no further changes to the section, and the conclusions of the addendum to the NIS remain as stated in the section. Refer to Section 7.4 of the 2024 Planning Report.**

### **7.5 Conclusions of the WFD Assessments**

**In response to RFI Section 1 (b), the change required to this section is to note the preparation of the amended Offshore Water Framework Directive Compliance Report (Appendix A11.1 of the Addendum of the EIAR) and the amended Onshore Water Framework Directive Compliance Report (Appendix A22.1 of the Addendum to the EIAR).**

#### **7.5.1 Offshore Water Framework Directive Compliance**

**The conclusions of the amended Offshore Water Framework Directive Compliance Report (Appendix A11.1 of the Addendum to the EIAR) remain as stated in the section.**

**There are no further changes to the section. Refer to Section 7.5.1 of the 2024 Planning Report.**

#### **7.5.2 Onshore Water Framework Directive Compliance**

**The conclusions of the amended Onshore Water Framework Directive Compliance Report (Appendix A22.1 of the Addendum to the EIAR) remain as stated in the section.**

**There are no further changes to the section. Refer to Section 7.5.2 of the 2024 Planning Report.**

### **7.6 Overall Conclusion**

**In response to RFI Section 1 (b), the change required to this section is to provide up to date data. In the second paragraph of the section, the following text is deleted:**

*“As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables by 2030, thus*

*contributing also to achieving the relevant EU objectives and targets, such as 111GW of offshore wind deployment across Europe by 2030.”*

**And replaced with the following text:**

Once planning development permission is secured, the project is expected to be well advanced in the construction phase by 2030, ensuring the proposed development will commence providing renewable electricity to the national grid. As an offshore wind project, the proposed development will deliver a significant proportion of Ireland’s target of 5GW offshore renewable electricity and 80% of total electricity from renewables, thus contributing also to the relevant EU objectives and targets.

**In light of recent and ongoing global geopolitical events, an additional paragraph has been added to further reaffirm the need for security of supply. Therefore, the following text shall be added to Section 7.6 of the 2024 Planning Report:**

Europe’s energy system remains highly exposed to geopolitical instability, as a significant share of global oil and LNG supply transits key maritime chokepoints vulnerable to disruption.

This causes uncertainty in both the supply and cost of energy. International assessments further highlight that such chokepoints expose the inherent vulnerability of global fuel markets, reinforcing the need for Europe to accelerate its shift towards secure, domestically generated clean energy (IEA, 2026). The proposed development will strengthen the domestic energy supply and reduce our dependency on the volatile international energy market.

**There are no further changes to the section. The conclusions of this Planning Report – RFI Update remain as stated in the section. Refer to Section 7.6 of the 2024 Planning Report.**

## 8. References

**The change required to this section is the addition of the references used in the updating of the 2024 Planning Report.**

**Therefore, the following references are added:**

Baringa (2025) Good for your Pocket: How renewable energy helps Irish electricity consumers

Commission for Regulation of Utilities (2024) National Energy Demand Strategy

Department of the Environment, Climate and Communications (2024) Climate Action Plan 2024

Department of the Environment, Climate and Communications (2025) Climate Action Plan 2025

Department of the Environment, Climate and Communications (2024) Offshore Renewable Energy (ORE) Future Framework Policy Statement

Department of the Environment, Climate and Communications (2025) Offshore Wind Energy Programme, Annual Review for 2024 and Key Actions for 2025

Department of the Environment, Climate and Communications (2025) National Designated Maritime Area Plan for Offshore Renewable Energy

Department of the Environment, Climate and Communications (2024) National Adaptation Framework 2024

Department of the Environment, Climate and Communications (2024) Accelerating Renewable Electricity Taskforce Implementation Plan

European Commission (2025) EU Blue Economy Report 2025

Eurostat (2025) Renewable energy statistics. European Commission.

European Union (Planning and Development) (Renewable Energy) Regulations 2025

European Union Nature Restoration Law (EU 2024/1991)

Government of Ireland (2025), National Development Plan Review

International Energy Agency (2026) Electricity 2026

The North Sea Summit (2026), Hamburg Declaration

Sustainable Energy Authority of Ireland (SEAI) (2025) Energy in Ireland

**In addition, the following references are deleted:**

*“Balbriggan (2019) Our Balbriggan 2019-2025 Rejuvenation Plan: New Thinking, Fresh Leadership, Ambitious Initiatives*

*Department of the Environment, Climate and Communications (2020) Ireland’s National Energy and Climate Plan 2021-2030*

*Programme for Government (June 2020): Our Shared Future.”*

**And replaced with:**

Balbriggan (2025) Our Balbriggan Town Rejuvenation Plan 2025-2030

Department of the Environment, Climate and Communications (2024) Ireland’s Integrated National Energy and Climate Plan 2021-2030

Programme for Government (2025): Securing Ireland’s Future

**There are no other changes required to this section. Refer to Section 8 of the 2024 Planning Report.**

# Appendix A

## Information Provided by Developer under Section 287A of Planning Acts

**There is no change to this section. Refer to Appendix A of the 2024 Planning Report.**

# Appendix B

## Design Flexibility Opinion Received from An Bord Pleanála under Section 287B of Planning Acts

**There is no change to this section. Refer to Appendix B of the 2024 Planning Report.**

# Appendix C

## Form 22 Supplementary Information to Accompany an Application Accompanied by an Opinion on Flexibility

**There is no change to this section. Refer to Appendix C of the 2024 Planning Report.**

# Appendix D

## Update to NMPF Compliance Document

**North Irish Sea Array Windfarm Ltd**

# North Irish Sea Array Offshore Wind Farm

## Addendum to the Environmental Impact Assessment Report

Reference: Appendix D: NMPF Compliance Report - RFI Update

Issue | 2026

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 304620-00

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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 in the Addendum to the EIAR). Amendments are therefore required to Appendix D: National Marine Planning Framework (NMPF) Compliance Report of the 2024 Planning Report.

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 Appendix D submitted as part of the 2024 Planning Report.

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 and/or Planning Report unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR and/or Planning Report will be clearly labelled as such.

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

The sections relevant to Appendix D in the RFI are included below.

RFI Section	RFI	Relevance to Chapter
3 (d)	(d). Incorporate the output from a), b) and c) and all other relevant updates made as a result of this request for further information, into a revised assessment of the NMPF policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on ‘important’ species and habitats as defined on page 35 and 36 of the NMPF....	An Coimisiún Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the National Marine Planning Framework (NMPF). The proposed development’s compliance with the NMPF has been updated in line with RFI 3 throughout this appendix.
4	The documentation submitted does not provide specific detail, assessment, or review of the range of ecosystem functions and services which could be impacted by the proposed development. The National Marine Planning Framework (NMPF) states that proposals to protect, maintain, restore, and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes. Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats.  The applicant is requested to update the EIAR to include an assessment of impacts (both positive and negative) on relevant ecosystem functions and services and include mitigation measures, as appropriate. The applicant is also requested to submit a synopsis report of the relevant impacts on ecosystem functions and services. In identifying the relevant ecosystem services for assessment, including those services classified as provisioning, regulation and maintenance, and cultural services, the applicant is advised to consider the full range of ecosystem services set out in the report ‘Valuing Ireland’s Blue Ecosystem Services’ (SEMURU of NUI Galway, 2018), as referenced in the NMPF.	The Developer has undertaken an assessment of impacts arising from the proposed development (positive and negative) on relevant ecosystem functions and services. Refer to Appendix A3.3: Ecosystem Functions and Services Assessment of the EIAR.  The Developer has updated the Seafloor and Water Column Integrity Policy 3 response as a result of RFI Section 4.

RFI Section	RFI	Relevance to Chapter
	The report should also consider the need for an adaptive management framework for ongoing assessment and should include provision for appropriate monitoring of any mitigation measures and operational management strategies, as well as provision for decommissioning.	
12 (a)	The NMPF provides that the proposed development should be considered in the context of co-existences with existing marine activities in the area, including fisheries and aquaculture. Having regard to the provisions of the NMPF, the submitted EIAR (including the Fisheries Management and Mitigation Strategy, Appendix 16.2), and all observations made:  The applicant is requested to address observations by prescribed bodies and observers who raise concerns in relation to the potential impacts on commercial fishing arising from the proposed development within both the array and the cable route corridor areas, specifically relating to the practicality and uncertainties of co-existence with reference to Co-existence Policy 1 in the NMPF.	The Developer has provided an Addendum to Chapter 16 Commercial Fisheries and Appendix 16.2 of the EIAR, which addresses the observations made by prescribed bodies and observers regarding potential impacts on commercial fishing. This document has been updated to reflect the updated assessment undertaken having regard to the provisions of the NMPF.
16	There is an existing gas interconnector pipeline located on the seabed between Ireland and Scotland, which is stated in the EIAR to be located c. 400-500m northwest of the array area (Appendix 17.1 Navigational Risk Assessment and Chapter 20). Section 15 of Appendix 17.1 relating to cumulative impacts incorrectly states there are no subsea cables/pipeline within 2nm. The applicant is requested to address the proximity of the existing gas interconnector pipeline to the north of the array area, having regard to NMPF Transmission Policy 5.	The Developer has provided an Addendum to Chapter 20 Infrastructure and Other Users of the EIAR, which responds to the request to address the existing gas interconnector pipeline.  This document has been updated to reflect the updated consultation undertaken with relevant parties having regard to the provisions of the NMPF.
17 (a)	‘EI-D1’ is an area of airspace surrounding Gormanston Airfield, utilised by the Irish Defence forces. The applicant is requested to confirm, following consultation with the Irish Air Corps, and having regard to NMPF Defence and Security Policy 1, that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area.	The Developer has provided an Addendum to Chapter 19 Aviation and Radar of the EIAR, which responds to the request to consult with the Irish Air Corps. Further detail is also provided in an Addendum to the Consultation Report (A1.2) of the EIAR.  This document has been updated to reflect the updated consultation undertaken having regard to the provisions of the NMPF.

## 1. Introduction

**The only change required to this section is due to the design refinement in response to the RFI, WTGs are now proposed with suction bucket foundations (Suction Bucket Jackets (SBJ)), and OSPs with jacket foundations installed with either pin piles or suction bucket foundations for both Project Option 1 and Project Option 2.**

**Therefore, the following text shall be deleted from Section 1 of Appendix D of the 2024 Planning Report:**

*“The proposed development is an offshore wind farm comprising 35 or 49 wind turbine generators (WTGs) installed using monopile or jacket foundations, 18km of offshore export cables, between 91km to 111km of inter array cables and one offshore substation platform (OSP). The onshore elements include connection of the offshore export cables to a proposed grid facility close to the landfall at Bremore and a 33-35km onshore cable route to connect the grid facility to an existing transmission substation at Belcamp, North Co. Dublin.”*

**And replaced with the following text:**

The proposed development is an offshore wind farm comprising 35 or 49 wind turbine generators (WTGs) installed using SBJs, 18km of offshore export cables, between 91km to 111km of inter array cables and one offshore substation platform (OSP) on either SBJ foundations or jacket foundations with drilled pin piles.

The onshore elements include connection of the offshore export cables to a proposed grid facility close to the landfall at Bremore and a 33-35km onshore cable route to connect the grid facility to an existing transmission substation at Belcamp, North Co. Dublin.

**In response to RFI 3 (d), 4, 12 (a), 16, and 17 (a) and in light of the design refinements made in response to consultation and the RFI (refer to Appendix A5.1: Design Refinements of the EIAR), a review and update of the Developers assessments and responses to the NMPF policies has been made in the relevant chapters of the EIAR and as indicated by the grey shading in Table A1. Therefore, Table 1 in Appendix D of the 2024 Planning Report shall be deleted and replaced with Table A1.**

**Table A1 Consistency of the proposed development with the policies and objectives of the NMPF.**

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
OVERARCHING MARINE PLANNING POLICIES (OMPPs)			
Environmental - Ocean Health			
Environmental – Ocean Health			
Environmental - Ocean Health Policy 1	<p>Compliance with NMPF policies relating to:</p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Non-Indigenous Species</li> <li>• Water Quality</li> <li>• Sea-floor and Water Column Integrity</li> <li>• Marine Litter</li> <li>• Underwater Noise</li> </ul> <p>should include demonstration of contribution to the relevant Marine Strategy Framework Directive (MSFD) targets identified.</p>	Yes	<p>The proposed development is an offshore wind farm which comprises construction, operation and decommissioning phases. Compliance with NMPF policies has been embedded into the design of the proposed development wherever possible. Where this has not been possible, additional mitigation and monitoring measures are proposed to ensure compliance.</p> <p>In relation to the MSFD, the first cycle of implementation established 24 environmental targets covering all descriptors. The 2021 update to the Irish Marine Strategy has led to 25 revised environmental targets to align with the Birds and Habitats Directives, the Water Framework Directive, the Common Fisheries Policy and in turn with the criteria in the Commission Decision 2017/848. This resulted in 10 biodiversity targets, two commercial fisheries targets, three eutrophication targets, four targets for contaminants, two targets for marine litter and one target for non-indigenous species, hydrographical conditions, underwater noise, and contaminants in seafood. These are addressed throughout the EIA as follows:</p> <ul style="list-style-type: none"> <li>• Ten Biodiversity targets (including food webs and sea-floor integrity) are addressed in the following chapters: Volume 3, Chapter 10: Marine Geology, Oceanography and Physical Processes (hereafter referred to as the ‘Physical Processes Chapter’), Volume 3, Chapter 11: Marine Water and Sediment Quality (hereafter referred to as the ‘Marine Water and Sediment Quality Chapter’), Volume 3, Chapter 12: Benthic Subtidal and Intertidal Ecology (hereafter referred to as the ‘Benthic Ecology Chapter’), Volume 3, Chapter 13: Fish and Shellfish Ecology (hereafter referred to as the ‘Fish and Shellfish Chapter’), Volume 3, Chapter 14: Marine Mammal Ecology (hereafter referred to as the ‘Marine Mammals Chapter’), Volume 4, Chapter 15: Offshore and Intertidal Ornithology (hereafter referred to as the ‘Offshore Ornithology Chapter’), Volume 5, Chapter 23: Biodiversity (hereafter referred to as the ‘Biodiversity Chapter’), and Volume 5, Chapter 35: Offshore Bats (hereafter referred to as the ‘Offshore Bats Chapter’). No significant, long-term negative effects have been identified in relation to the biodiversity targets for all impacts assessed.</li> <li>• Two commercial fisheries targets are addressed in the following chapters: the Fish and Shellfish Chapter and Volume 3, Chapter 16: Commercial Fisheries (hereafter referred to as the ‘Commercial Fisheries Chapter’). No significant negative effects have been identified in relation to the commercial fisheries targets.</li> </ul>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<ul style="list-style-type: none"> <li>• Three eutrophication targets are addressed in the following chapters of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, and Volume 4: Chapter 22: Water (hereafter referred to as the ‘Water Chapter’). No significant negative effects have been identified in relation to the eutrophication targets.</li> <li>• Four targets for contaminants are addressed in the following locations of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, the Water Chapter, the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8), and the Onshore Construction Environmental Management Plan (Appendix 9.1 of Volume 8). No significant negative effects have been identified in relation to the contaminant’s targets.</li> <li>• Two targets for marine litter are addressed in the following locations of the EIAR: Volume 5, Chapter 31: Resource and Waste Management (hereafter referred to as the ‘Resource and Waste Chapter’) and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8). No significant negative effects have been identified in relation to the marine litter targets.</li> <li>• The non-indigenous species target is assessed in the following locations of the EIAR: the Benthic Ecology Chapter, the Biodiversity Chapter, and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8). No significant negative effects were identified in relation to the non-indigenous species target.</li> <li>• The hydrographical target is addressed in the following locations of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, the Water Chapter. No significant negative effects have been identified in relation to the hydrographical targets.</li> <li>• The underwater noise target is addressed in the following locations of the EIAR: the Fish and Shellfish Chapter, the Marine Mammals Chapter and the Underwater Noise Modelling Report (Appendix 14.1 of Volume 8). No significant residual negative effects have been identified in relation to underwater noise targets.</li> <li>• The contaminants in seafood target are addressed in the Fish and Shellfish Chapter. No significant negative effects have been identified in relation to the contaminants in seafood targets.</li> </ul> <p>The assessments conducted concluded that the proposed development will not have a negative effect on achieving good environmental status for the 25 current MSFD targets which demonstrates compliance of the proposed development with Environmental – Ocean Health Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Biodiversity			
Biodiversity Policy 1	<p>Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity</li> </ul>	Yes	<p>The proposed development has the potential to have significant adverse impacts on species adaptation or migration or natural habitat connectivity. However, the design has been developed to avoid impacts where practicable and the assessments carried out in the preparation of the EIAR have included measures to minimise and mitigate against any potential adverse effects on biodiversity. As such no significant permanent negative impacts on species adaptation or migration, or on natural native habitat connectivity, are expected.</p> <p>The residual effects of the proposed development in relation to species and species habitats are described in the following chapters:</p> <ul style="list-style-type: none"> <li>• The Benthic Ecology Chapter: Sections 12.5 to 12.7 demonstrate that the effects on seabed habitats and communities arising from disturbances during the lifecycle of the proposed development are all assessed to be not significant.</li> <li>• The Fish and Shellfish Chapter: Sections 13.5 to 13.7 inclusive, demonstrate that the significance of effects on fish, shellfish and megafauna species (turtles and basking sharks) associated with temporary increase in suspended sediment concentrations (SSC) and sediment deposition; habitat damage and disturbance; mortality, injury, behavioural impacts and auditory masking arising from noise and vibration are all assessed to be not significant.</li> <li>• The Marine Mammals Chapter: Sections 14.5 to 14.7 inclusive, demonstrate that the significance of effects associated with UXO clearance, other construction activities, disturbance and collisions with vessels on prey availability and distribution and increased concentration of suspended solids are all assessed to be not significant for all species, post mitigation. The mitigation to be used includes an Environmental Vessel Management Plan (EVMP), and a Marine Mammal Management Protocol (MMMP).</li> <li>• The Offshore Ornithology Chapter: Sections 15.5 to 15.7 inclusive, demonstrate that the proposed development with proposed mitigation will not have significant effects on bird species adaptation or migration, and there will be no significant disturbance or displacement to birds.</li> <li>• In the Biodiversity Chapter, the significance of effects associated with disturbance or important habitat reduction is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, reversible and negative residual effects at a local geographical scale to FW2 Lowland depositing river habitat during the construction phase.</li> </ul> <p>Short-term, reversible, and negative impacts are also assessed on WL1 hedgerows and WL2 treelines and on breeding birds which will be reversed as habitats are reinstated and compensatory planting is established at Blakes Cross North and the landfall site. Temporary, reversible impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<p>However, positive, long-term effects are expected during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development.</p> <p>Short-term likely significant residual effect at a local scale while badger habituate to the onshore infrastructure, in particular at the gird facility. No long-term significant residual effect.</p> <ul style="list-style-type: none"> <li>The Offshore Bats Chapter; Sections 35.5 to 35.7, inclusive, demonstrate that the proposed development with proposed mitigation will not have significant adverse effects on bat species adaptation or migration, and there will be no significant disturbance or displacement to bat species and populations.</li> </ul> <p>The proposed development has been subjected to a robust design and assessment process intended to avoid and minimise impacts to biodiversity, including on species adaptation or migration, or on natural native habitat connectivity. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 1.</p>
Biodiversity Policy 2	<p>Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.</p> <p>Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats.</p>	Yes	<p>The assessments carried out in the preparation of the EIAR have included measures to avoid, minimise and mitigate against any potential adverse effects on the distribution and net extent of important habitats and other habitats that important species depend on.</p> <p>The NMPF defines important habitats as:</p> <ul style="list-style-type: none"> <li>Habitats listed in Annex I of the EU Habitats Directive; and</li> <li>Threatened and/or declining habitats identified under the OSPAR Convention and associated recommendations that have been adopted by Contracting Parties.</li> </ul> <p>Impacts to these important habitats have been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD). This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and it concludes that the proposed development will not result in a deterioration of the current overall status of the Celtic Sea North Inner Marine Reporting Units (MRU) or broad habitat types therein or jeopardise the attainment of Good Environmental Status. It is considered that the proposed development will result in no significant effect and no risk in relation to GES under D11C1 Impulsive Noise. Also, there is no significant effect and no risk in relation to GES under D11C2 Continuous Noise. As habitat loss and effects to habitats are under the thresholds of 2% and 25% respectively no significant effects are expected to habitats listed as ‘important’ in the NMPF.</p> <p>Additionally, no significant adverse impacts on such habitats are expected in accordance with the EIAR assessment methodology. Evidence of this is included within the following chapters:</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<ul style="list-style-type: none"> <li>In the Benthic and Intertidal Ecology Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with habitat damage and disturbance is assessed to be not significant.</li> <li>In the Fish and Shellfish Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with a temporary increase in SSC and sediment deposition, habitat damage and disturbance, are all assessed to be not significant.</li> <li>In the Marine Mammals Chapter, the significance of effects associated with UXO clearance, and temporary increase in suspended sediment concentration (SSC) are all assessed to be minor or negligible for all species, post mitigation.</li> <li>In the Biodiversity Chapter, the significance of effects associated with habitat disturbance or important habitat reduction is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, reversible and negative residual effects at a local geographical scale to FW2 Lowland depositing river, WL1 hedgerows and WL2 treelines habitats during the construction phase. Temporary, reversible and negative impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas.</li> </ul> <p>However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development.</p> <p>Short-term likely significant residual effect at a local scale while badger habituate to the onshore infrastructure, in particular at the gird facility. No long-term significant residual effect.</p> <p>The proposed development has been subject to a robust design and assessment process intended to avoid and minimise impacts on habitats. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 2.</p>
Biodiversity Policy 3	<p>Where marine or coastal natural capital assets are recognised by Government:</p> <ul style="list-style-type: none"> <li>Proposals must seek to enhance marine or coastal natural capital assets where possible.</li> <li>Proposals must demonstrate that they will in order of preference, and in accordance with legal requirements:</li> </ul>	Yes	<p>The design has been developed to avoid, where possible, impacts on marine or coastal natural capital assets, such as flora and fauna, air, water, geology and soils. The assessments carried out in the preparation of the EIAR have included measures to minimise and mitigate against any potential adverse effects on natural capital assets. No significant, permanent negative impacts on natural capital assets are expected.</p> <p>The residual effects of the proposed development in relation to natural capital assets is included within the following chapters:</p> <ul style="list-style-type: none"> <li>In the Benthic and Intertidal Ecology Chapter: Sections 12.5 to 12.7 demonstrate that the significance of effects assessment of the potential impacts to seabed habitats arising from disturbances during the lifecycle of the proposed development are all assessed to be not significant.</li> </ul>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts on marine or coastal natural capital assets, or</li> <li>• if it is not possible to mitigate significant adverse impacts on marine or coastal natural capital assets proposals must set out the reasons for proceeding</li> </ul>		<ul style="list-style-type: none"> <li>• In Volume 4, Chapter 21: Land and Soils, Sections 21.5 to 21.7 demonstrate that the significance of effects assessment of the potential impacts to soils and geology arising from disturbances during the lifecycle of the proposed development are not significant.</li> <li>• In the Water Chapter, Sections 22.5 to 22.7 demonstrate that the significance of effects assessment of the potential impacts to water quality arising from disturbances during the lifecycle of the proposed development are not significant.</li> <li>• In the Biodiversity Chapter, the significance of effects associated with disturbance to natural capital assets is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, reversible negative residual effects at a local geographical scale to FW2 Lowland depositing river habitat. However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development.</li> <li>• The assessment presented in Volume 5, Chapter 27: Air Quality (hereafter referred to as the 'Air Quality Chapter') concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development.</li> </ul> <p>The proposed development has been subject to a robust design and assessment process which has sort to avoid and minimise impacts to marine and coastal natural capital assets. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level.</p> <p>Consequently, the proposed development complies with the requirements of Biodiversity Policy 3.</p>
Biodiversity Policy 4	<p>Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant disturbance to, or displacement of, highly mobile species</li> </ul>	Yes	<p>The assessments carried out in the preparation of the EIAR have included measures to avoid, minimise and mitigate against any potential adverse effects on highly mobile species. Evidence of this is included within the following chapters:</p> <ul style="list-style-type: none"> <li>• In the Fish and Shellfish Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with the temporary increase in SSC and sediment deposition, habitat damage and disturbance, mortality, injury, behavioural impacts and auditory masking arising from noise and vibration during construction, on fish and shellfish, are all assessed to be not significant.</li> <li>• In the Marine Mammals Chapter, the significance of effects associated with UXO clearance, other construction activities, disturbance and collisions with vessels, prey availability and distribution and increased concentration of suspended solids are all assessed to be minor or negligible for all species, post mitigation. The mitigation to be used includes a EVMP and a MMMP.</li> </ul>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<ul style="list-style-type: none"> <li>In the Offshore Ornithology chapter, the significance of effects associated with disturbance and displacement from increased vessel activity, indirect effects on prey species, habitat loss, the accidental release of pollutants during construction, operation and decommissioning are all assessed to be not significant. During operation there is also collision risk of seabirds and migratory birds with offshore infrastructure in the array area and impacts arising from artificial light which are both assessed to be not significant.</li> <li>In the Biodiversity Chapter, the significance of effects associated with mobile species is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, significant and reversible effects on breeding birds which will be reversed as habitats are reinstated and compensatory planting is established at Blakes Cross North and the landfall site. Temporary, significant and reversible impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas. Short-term likely significant residual effect at a local scale while badger habituate to the onshore infrastructure, in particular at the gird facility. No long-term significant residual effect. However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development.</li> <li>In the Offshore Bats chapter, the significance of effects associated with disturbance and displacement from noise, vessel activity and infrastructure, artificial lighting at night, changes to prey during construction, operation and decommissioning are all assessed to be not significant. During operation there is also potential impacts to migrating and foraging bat species from collision and barotrauma which is also assessed to be not significant. The embedded mitigation measures discussed in each chapter ensure compliance with Biodiversity Policy 4.</li> </ul>
<b>Protected Marine Sites</b>			
Protected Marine Sites Policy 1	Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.	Yes	<p>The Developer has prepared a Natura Impact Statement (NIS) which is included within the planning application, which assessed whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site.</p> <p>No potential impacts were identified on the conservation objectives of any of the SACs and SPAs screened in to the assessment that may result in an adverse effect on the integrity of the European site following mitigation.</p> <p>This ensures compliance with Protected Marine Sites Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			Please refer to the NIS document prepared for the proposed development for a full detailed analysis of each SAC and SPA.
Protected Marine Sites Policy 2	<p>Proposals supporting the objectives of protected marine sites should be supported and:</p> <ul style="list-style-type: none"> <li>• be informed by appropriate guidance</li> <li>• must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites</li> </ul>	Yes	<p>The Developer has prepared an NIS to assess whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. The guidance used in the preparation of the NIS was as follows.</p> <ul style="list-style-type: none"> <li>• Appropriate Assessment Screening for Development Management-OPR Practice Note PN01 (Office of the Planning Regulator, 2021);</li> <li>• Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment Heritage and Local Government (DEHLG, 2009, revised 11/02/10);</li> <li>• Guidelines for Ecological Impact Assessment in the UK and Ireland. Chartered Institute of Ecology and Environmental Management (CIEEM 2018, updated 2022);</li> <li>• Offshore Renewable Energy Development Plan II: Draft Strategic Environmental Assessment Report. Department of Environment, Climate and Communications &amp; Sustainable Energy Authority Ireland (DECC, 2023);</li> <li>• Offshore Renewable Energy Development Plan II: Principles Report. Department of Environment, Climate and Communications &amp; Sustainable Energy Authority Ireland (DECC, 2022);</li> <li>• Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive - Guidance for Planning Authorities (DEHLG, 2010); Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 and PSSP 2/10 (DEHLG, 2010);</li> <li>• Guidance on EIS and NIS preparation for Offshore Renewable Energy Projects. Department of Communications, Climate Action and Environment (DCCAE, 2017);</li> <li>• Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission (EC 2021);</li> <li>• Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011);</li> <li>• Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC. European Commission (EC, 2007);</li> <li>• European Commission Managing Natura 2000 sites The provisions of Article 6 of the Habitats Directive 92/43/EEC, EC 2018;</li> </ul>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<ul style="list-style-type: none"> <li>• Marine Natura Impact Statements in Irish Special Areas of Conservation: A working document. Prepared by National Parks and Wildlife Service. Department of Arts, Heritage and Gaeltacht (DAHG 2012);</li> <li>• Guidance to Manage the Risk to Marine Mammals from Manmade Sound Sources in Irish Waters. Prepared by National Parks and Wildlife Service. Department of Arts, Heritage and Gaeltacht (DAHG 2014);</li> <li>• Wind energy developments and Natura 2000. European Commission (EC, 2011);</li> <li>• The Guiding Principles for Cumulative Impact Assessments in Offshore Wind Farms, (Renewable UK, 2013) as presented in the Guidance on EIS and NIS Preparation for Offshore Renewable Energy Projects. Department of Communications, Climate Action and Environment (DCCAE, 2017); and</li> <li>• Interpretation line suggested by the Commission as regards the application of Directive 85/337/EEC to associated/ancillary works.</li> </ul> <p>The guidance used to inform the NIS ensures compliance with Protected Marine Sites Policy 2.</p>
Protected Marine Sites Policy 3	<p>Proposals that enhance a protected marine site’s ability to adapt to climate change, enhancing the resilience of the protected site, should be supported and:</p> <ul style="list-style-type: none"> <li>• be informed by appropriate guidance</li> <li>• must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites</li> </ul>	Yes	<p>The purpose of the proposed development is not to enhance the ability of any marine protected site to adapt to climate change.</p> <p>However, the proposed development is an offshore wind energy project which will significantly contribute to the Government’s target of achieving 5GW of electricity generated by offshore wind by 2030. The renewable electricity generated will facilitate the long-term shift away from fossil fuel use and associated fossil fuel emissions. There will be a net beneficial impact on climate change which will have the indirect effect of enhancing the resilience of marine protected sites.</p> <p>This ensures compliance with Protected Marine Sites Policy 3.</p>
Protected Marine Sites Policy 4	<p>Until the ecological coherence of the network of protected marine sites is examined and understood, proposals should identify, by review of best available evidence (including consultation with the competent authority with responsibility for designating such areas as required), the features, under consideration at the time the application is made, that may be required to develop and further establish the network.</p> <p>Based upon identified features that may be required to develop and further establish the network, proposals should demonstrate that they will, in order of preference, and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> </ul>	Yes	<p>In the preparation of the EIAR and NIS, the features and qualifying interests of the protected marine sites, within the zone of influence of the proposed development, were identified. The likely significant effects on the features and qualifying interests of protected marine sites were assessed, in particular in the EIAR in the Physical Processes Chapter, the Benthic Ecology Chapter, the Fish and Shellfish Chapter, the Marine Mammals Chapter, the Offshore Ornithology Chapter and the Biodiversity Chapter. Mitigation measures were proposed, as required.</p> <p>The Developer prepared a NIS to assess whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site.</p> <p>No potential impacts were identified on the conservation objectives of any of the SACs and SPAs in the proposed development’s zone of influence that may result in an adverse effect on the integrity of the European site following mitigation.</p> <p>This ensures compliance with Protected Marine Sites Policy 4.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>minimise or</li> <li>mitigate significant impacts on features that may be required to develop and further establish the network or</li> <li>if it is not possible to mitigate significant impacts, proposals should set out the reasons for proceeding</li> </ul>		
Non-Indigenous Species			
Non-Indigenous Species Policy 1	<p>Reducing the risk of the introduction and / or spread of non-indigenous species is a requirement of all proposals. Proposals must demonstrate a risk management approach to prevent the introduction of and / or spread of non-indigenous species, particularly when:</p> <ul style="list-style-type: none"> <li>moving equipment, boats or livestock (for example fish or shellfish) from one water body to another</li> <li>introducing structures suitable for settlement of non-indigenous species, or the spread of non-indigenous species known to exist in the area of the proposal</li> </ul>	Yes	<p>No marine invasive non-native species (MINNS) were identified during the site-specific surveys. However, records of a number of non-native species exist from the benthic study area such as slipper limpet, <i>Crepidula fornicata</i>, wireweed <i>Sargassum multicum</i>, carpet sea squirt <i>Didemnum vexillum</i>, Japanese skeleton shrimp <i>Caprella mutica</i>, leathery sea squirt <i>Styela clava</i> and the Pacific oyster <i>Magallana gigas</i>.</p> <p>New hard substrate habitat will be introduced into the array area and subtidal component of the ECC, which has the potential to provide new habitat for colonisation by MINNS. In addition to this a wide range of vessels will be engaged, particularly in the construction and decommissioning phases, of the proposed development. The vessels may come from overseas and some operation and maintenance vessels will undertake trips, which will contribute to the risk of introduction or spread of MINNS through ballast water discharge. The risk is addressed in Chapter 12: Benthic Intertidal and Subtidal Ecology and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8).</p> <p>Non-native species management measures implemented during the construction, operation and decommissioning phases are in compliance with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (2004) and the International Convention for the Prevention of Pollution from Ships (MARPOL), thus ensuring that the risk of the potential introduction and spread of MINNS will be minimised.</p> <p>These measures are included in the offshore Environmental Management Plan (Appendix A6.1) and ensure compliance of the proposed development with Non-Indigenous Species Policy 1.</p>
Water Quality			
Water Quality Policy 1	Proposals that may have significant adverse impacts upon water quality, including upon habitats and species beneficial to water quality, must demonstrate that they will, in order of preference and in accordance with legal requirements:	Yes	The proposed development will require seabed installations of export cables, inter-array cables, 35 to 49 WTGs and one OSP. The construction phase has the potential to introduce contaminants and increase suspended sediment in the water column, causing deterioration of the water quality of bathing waters, shellfish water protected areas (WPAs), waterbodies designated under the Water Framework Directive (WFD) and non-designated waterbodies.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts</li> </ul>		<p>Potential impacts to water quality have been assessed in the Marine Water and Sediment Quality Chapter and the Water Chapter, with no significant adverse residual effects expected on relevant waterbodies (designated and non-designated) during construction, operation and decommissioning. Further information is also provided in the Offshore Water Framework Directive Compliance Report (Appendix 11.1 of Volume 9) and the Onshore Water Framework Directive Compliance Report (Appendix 22.2 of Volume 10).</p> <p>Habitats and species that are sensitive to a change in water quality are considered in the Benthic and Intertidal Ecology Chapter, Fish and Shellfish Chapter, Offshore Ornithology Chapter and Marine Mammals Chapter. Potential impacts have been identified (Sections 12.4 and 13.4, respectively) and assessment of the effect of these impacts is presented (Sections 12.7 and 13.7, respectively).</p> <p>Mitigation measures are presented in each chapter (Sections 12.6 and 13.6, respectively). These include an offshore environmental management plan (EMP) that specifies measures that will reduce the risk of harm to habitats and species including:</p> <ul style="list-style-type: none"> <li>• Marine pollution contingency measures to address the risks, methods and procedures to deal with any spills and collision incidents in relation to all activities carried out seaward of the high-water mark (HWM)</li> <li>• A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance</li> <li>• Non-native species measures to manage the risk of introduction and spread of invasive non-native species; and</li> <li>• Waste management arrangements</li> </ul> <p>Due to the assessed level of impact to water quality being not significant for all activities assessed and the commitment to implement the Offshore EMP to manage potential impacts to water quality, the proposed development is compliant with Water Quality Policy 1.</p>
Water Quality Policy 2	Proposals delivering improvements to water quality, or enhancing habitats and species, which can be of benefit to water quality, should be supported.	No	Water Quality Policy 2 is not relevant to the proposed development as the project is not designed to improve water quality, nor enhance habitats and species.
<b>Sea Floor and Water Column Integrity</b>			
Sea Floor and Water Column Integrity Policy 1	Proposals that incorporate measures to support the resilience of marine habitats will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority and where they contribute to the policies and objectives of this NMPF.	Yes	The proposed development will require seabed installation of export cables, inter-array cables, 35 to 49 WTGs and one OSP. The construction phase has the potential to introduce pollutants, chemicals and suspended sediment into the water column, causing deterioration of the water quality and consequent adverse impacts on marine habitats. The placement of temporary and permanent infrastructure on the seabed also has the potential to cause temporary and long-term habitat loss.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<p>Proposals which may have significant adverse impacts on marine, particularly deep sea, habitats must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts on marine habitats or</li> <li>• if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding</li> </ul>		<p>Impacts to important habitats have been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD). This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and concludes that the proposed development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.</p> <p>The potential impacts from the construction, operation and decommissioning activities on marine habitats have been assessed in the Benthic and Intertidal Ecology Chapter and the Fish and Shellfish Chapter.</p> <p>The direct impacts to subtidal benthic habitats as a result of long-term habitat loss during construction, operation and decommissioning are assessed to be not significant. There will be no loss of intertidal habitat (due to the use of HDD under the intertidal zone to the exit pit in the subtidal zone) and minimal loss and disturbance of nearshore habitats at the exit pit location itself.</p> <p>The offshore EMP (Appendix A6.1) includes measures that will reduce the risk of harm to benthic and intertidal species and habitats including:</p> <ul style="list-style-type: none"> <li>• Marine pollution contingency measures in compliance with MARPOL to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM</li> <li>• A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance</li> <li>• Non-native species measures to manage the risk of introduction and spread of invasive non-native species and</li> <li>• Waste management arrangements</li> </ul> <p>Due to the assessed level of impact being not significant and the commitment to implement the offshore EMP, the proposed development is compliant with Sea Floor and Water Column Integrity policy 1.</p>
Sea Floor and Water Column Integrity Policy 2	<p>Proposals, including those that increase access to the maritime area, must demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate adverse impacts on important habitats and species</li> </ul>	Yes	<p>The proposed development will require seabed installation of export cables, inter-array cables, up to 49 WTGs and one OSP. The construction phase has the potential to introduce pollutants, chemicals and suspended sediment into the water column, causing deterioration of water quality and consequent adverse impacts on important habitats and species. The placement of temporary and permanent infrastructure on the seabed also has the potential to cause temporary and long-term habitat loss.</p> <p>Impacts to important habitats have been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD).</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<p>This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and it concludes that the proposed development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.</p> <p>The potential impacts from the construction, operation and decommissioning activities on marine habitats have been assessed in the Benthic and Intertidal Ecology Chapter and the Fish and Shellfish Chapter.</p> <p>The likelihood of direct impacts to habitats is assessed to be not significant and there will be minimal loss and disturbance of inshore habitats. No ecologically significant adverse residual effects on benthic subtidal ecology receptors have therefore been predicted as a result of long-term habitat loss.</p> <p>The offshore EMP (Appendix 6.1) includes measures that will reduce the risk of harm to benthic and intertidal species and habitats including:</p> <ul style="list-style-type: none"> <li>• Marine pollution contingency measures in compliance with MARPOL to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM</li> <li>• A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance</li> <li>• Non-native species management measures to manage and prevent the risk of introduction and spread of MINNS and</li> <li>• Waste management arrangements</li> </ul> <p>Due to the assessed level of impact being below ‘significant adverse’ and the commitment to implement the offshore EMP, the proposed development is compliant with Sea Floor and Water Column Integrity policy 2.</p>
Sea Floor and Water Column Integrity Policy 3	<p>Proposals that protect, maintain, restore and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.</p> <p>Proposals must take account of the space required for coastal habitats, for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> </ul>	Yes	<p>The installation of the export cables at the landfall has the potential to have an adverse impact through disturbance on coastal habitats, ecosystem functioning and ecosystem services at the coastline. At the landfall the export cables will be installed by horizontal directional drilling (HDD). The HDD entrance pit is situated landward of the HWM and the HDD exit pit is seaward of the low water mark, thereby effectively avoiding the entire intertidal zone. Therefore, the landfall activities will minimise the potential for impact on the coastal habitats and ecosystems.</p> <p>Impacts to these important habitats have been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD). This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and it concludes that the proposed development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>mitigate for net loss of coastal habitat</li> </ul>		<p>The impacts on subtidal and inter-tidal coastal habitats are assessed the Intertidal and Benthic Ecology Chapter and the residual effects are described in 12.5 to 12.7 and are assessed as not significant. The impacts on the coastal habitats above the HWM are assessed in the Biodiversity Chapter and the residual effects are described in Section 23.7. The conclusion of the assessments is that there will be no likely significant effects on the coastal habitats above the HWM.</p> <p>An Ecosystem Functions and Service Assessment has been prepared (Appendix A3.3) that provides an assessment of the potential impacts of the proposed development on ecosystem function and services. The outcome of individual receptor assessments concluded no material impact on ecosystem services, and no impediment to the ability of normal ecosystem functions and services to function, resulting from the proposed development.</p> <p>The offshore EMP (Appendix 6.1) and the onshore Construction Environmental Management Plan (CEMP) include measures that will reduce the risk of harm to coastal species and habitats including:</p> <ul style="list-style-type: none"> <li>A marine pollution contingency plan to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM</li> <li>A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance</li> <li>A non-native species management plan detailing how the risk of introduction and spread of invasive non-native species will be minimised and</li> <li>Waste management arrangements</li> </ul> <p>Due to the assessed level of impact being below ‘significant adverse’ and the commitment to implement the offshore EMP and onshore CEMP, the proposed development is compliant with Sea Floor and Water Column Integrity Policy 3.</p>
<b>Marine Litter</b>			
Marine Litter Policy 1	<p>Proposals that facilitate waste re-use or recycling, or that reduce marine and coastal litter will be supported, where they contribute to the policies and objectives of this NMPF. Proposals that could potentially increase the amount of litter that is discharged into the maritime area, either intentionally or accidentally, must include measures (such as development of a waste management plan) to, in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>avoid</li> <li>minimise or</li> </ul>	Yes	<p>The proposed development will require numerous vessels in the construction, operation and decommissioning phases, which raises the risk of potentially introducing litter into the maritime area. To mitigate this risk the Developer is committed to implementing the marine pollution contingency measures which are laid out in full in the offshore EMP (Appendix 6.1) to comply with MARPOL requirements.</p> <p>The Developer will manage waste as per the accepted waste hierarchy broadly defined as prevention, preparing for re-use, recycling, recovery, and disposal, in decreasing order of preference.</p> <p>The offshore EMP provides a detailed explanation of the measures which ensures compliance with Marine Litter Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>mitigate the litter</li> </ul> <p>Demonstration of these measures must provide satisfactory evidence that the proposal is able to manage all waste without creation of litter.</p>		
<b>Underwater Noise</b>			
Underwater Noise Policy 1	<p>Proposals must take account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna.</p> <p>Where the potential for significant impact on marine fauna from underwater noise is identified, a Noise Assessment Statement must be prepared by the proposer of development. The findings of the Noise Assessment Statement should demonstrably inform determination(s) related to the activity proposed and the carrying out of the activity itself.</p> <p>The content of the Noise Assessment Statement should be relevant to the particular circumstances and must include:</p> <ul style="list-style-type: none"> <li>Demonstration of compliance with applicable legal requirements, such as necessary assessment of proposals likely to have underwater noise implications, including but not limited to: <ul style="list-style-type: none"> <li>Appropriate Assessment (AA)</li> <li>Environmental Impact Assessment (EIA)</li> <li>Strategic Environmental Assessment (SEA)</li> <li>Specific response to ‘strict protection’ requirements of Article 12 of the Habitats Directive in relation to certain species listed in Annex IV of the Directive and</li> <li>Species protected under the Wildlife Acts</li> </ul> </li> <li>An assessment of the potential impact of the development or use on the affected species in terms of environmental sustainability</li> </ul>	Yes	<p>The proposed development will be constructed using a variety of underwater techniques and therefore is expected to create some level of underwater noise. Underwater noise modelling was undertaken as part of the preparation of the EIAR to assess the likely significant effects on marine fauna.</p> <p>The assessment presented in the Marine Mammals Chapter (supported by the Underwater Noise Assessment Technical Note (Appendix A14.1 of Volume 9)) considered the loudest noise and the greatest potential impact range, which was from UXO clearance. Other noise sources were also considered, including cable laying, dredging, drilling, rock placement, trenching and the operation of the turbines. These noise sources were found to be significantly below that of the noise of unexploded ordnance clearance.</p> <p>The assessment presented in the Marine Mammals Chapter determined that there will be no significant effects on marine fauna from underwater noise (Section 14.7). Consequently, a Noise Assessment Statement is not required.</p> <p>The proposed development has also been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD). This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and concludes that there will be no significant adverse effects from underwater noise.</p> <p>Underwater noise impacts have also been considered in the NIS where marine fauna species are identified as Qualifying Interests of protected marine sites.</p> <p>Proposed mitigation measures include the use of marine mammal observers and acoustic deterrent devices, and these are described in the MMMP (in Appendix A14.5 of Volume 9). Implementation of these measures ensures compliance with Underwater Noise Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>Demonstration that significant adverse impacts on marine fauna resulting from underwater noise will, in order of preference and in accordance with legal requirements be:               <ol style="list-style-type: none"> <li>avoided</li> <li>minimised or</li> <li>mitigated or</li> <li>if it is not possible to mitigate significant adverse impacts on marine fauna, the reasons for proceeding must be set out</li> </ol> </li> </ul> <p>This policy should be included as part of statutory environmental assessments where such assessments require consideration of underwater noise.</p>		
<b>Air Quality</b>			
Air Quality Policy 1	Proposals that support a reduction in air pollution should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must demonstrate consideration of their contribution to air pollution, both direct and cumulative.	Yes	<p>The proposed development is an offshore wind energy project. As a significant source of renewable electricity, the proposed development will result in a reduction in the air pollution from fossil fuel electricity generation, both directly and cumulatively.</p> <p>The assessment presented in the Air Quality Chapter concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development.</p> <p>Therefore, the proposed development complies with Air Quality Policy 1.</p>
Air Quality Policy 2	Where proposals are likely to result in or facilitate an increase in air pollution, proposals should demonstrate that they will, in order of preference in accordance with legal requirements and standards: <ul style="list-style-type: none"> <li>avoid</li> <li>minimise or</li> <li>mitigate air pollution</li> </ul>	Yes	<p>As a significant source of renewable electricity, the proposed development will result in a reduction in air pollution from fossil fuel electricity generation. Whilst there will be a moderate negative residual effect of increased air pollution associated with the construction phase of the proposed development, this is not considered significant in EIA terms.</p> <p>The assessment presented in the Air Quality Chapter concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development.</p> <p>Therefore, the proposed development complies with Air Quality Policy 2 by providing a reduction in overall air pollution.</p>
<b>Climate Change</b>			
Climate Change Policy 1	Proposals should demonstrate how they: <ul style="list-style-type: none"> <li>avoid contribution to adverse changes to physical features of the coast</li> </ul>	Yes	<p>The proposed development will be subject of a statutory environmental impact assessment.</p> <p>The potential impact of the construction and presence of the offshore infrastructure on the coastline has been assessed within the Marine Physical Processes Chapter of the EIAR. The assessment concluded that there will be no significant adverse effects (Section 10.7).</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>enhance, restore or recreate habitats that provide a flood defence or carbon sequestration ecosystem services where possible</li> </ul> <p>Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements:</p> <ul style="list-style-type: none"> <li>avoided</li> <li>minimised</li> <li>mitigated</li> <li>if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out</li> </ul> <p>This policy should be included as part of statutory environmental assessments where such assessments are required.</p>		<p>In the preparation of the EIAR, no flood defence or carbon sequestration ecosystem service receptors were identified within assessment study areas.</p> <p>The coastal area in proximity to the proposed development boundary seaward of the HWM (hereafter referred to as the ‘offshore development area’) is relatively benign and sheltered in terms of wave and tidal effects which is conducive to the settlement of mainly fine sediments that dominate the local seabed.</p> <p>The presence of the WTG and OSP during the operational phase will cause slight reductions in wave heights which will dissipate to leeward (down-wind) of the array area. Modelling of wave processes toward the adjacent coastline showed that during large storm events there would be a slight reduction in the heights of waves which could reach the coastline. However, subsequent wave shoaling into shallow water will remain the dominant process on waves in the nearshore, so this modification to wave conditions is considered imperceptible, relative to baseline conditions, which is not significant.</p> <p>In addition, tidal blockage, which will occur in the form of local scale flow interactions around individual WTG and OSP foundations, will not extend any distance or occur at a scale that would interfere with any marine process receptors, therefore there would be no impact to the coastal area.</p> <p>Modelling of physical processes resulting from the proposed development demonstrated that there will be no adverse changes to physical features of the coast, ensuring compliance with Climate Change Policy 1.</p>
Climate Change Policy 2	<p>For the lifetime of the proposal, the following climate change matters must be demonstrated:</p> <ul style="list-style-type: none"> <li>estimation of likely generation of greenhouse gas emissions, both direct and indirect</li> <li>measures to support reductions in greenhouse gas emissions where possible</li> <li>likely impact of climate change effects upon the proposal from factors including but not limited to: sea level rise, ocean acidification, changing weather patterns</li> <li>measures incorporated to enable adaptation climate change effects</li> <li>likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities</li> </ul>	Yes	<p>The proposed development will be a significant source of renewable electricity over its 35-year life.</p> <p>The generation of greenhouse gas emissions due to the construction of the proposed development and the savings in greenhouse gas emissions during its operations are presented and assessed in Volume 5, Chapter 28: Climate. The assessment demonstrated that significant reductions in greenhouse gas emissions will arise due to the consumption of renewable electricity over the lifetime of the proposed development.</p> <p>Consequently, the proposed development complies with Climate Change Policy 2.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements:               <ol style="list-style-type: none"> <li>avoided,</li> <li>minimised,</li> <li>mitigated,</li> </ol> </li> </ul> <p>if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.</p>		
Economic – Thriving Maritime Economy			
Co-existence			
Co-existence Policy 1	<p>Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate.</p> <p>If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference:</p> <ul style="list-style-type: none"> <li>minimise significant adverse impacts</li> <li>mitigate significant adverse impacts or</li> <li>if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</li> </ul>	Yes	<p>The site of proposed development is in an area of relatively high marine usage and as such, poses a potential for high levels of potential adverse impacts. However, the developer is committed to implementing mitigation measures to significantly reduce these impacts.</p> <p>The developer will create and ensure the contractor implements cable specification and installation measures, a Cable Risk Assessment (CBRA), a Vessel Management Plan (VMP) and a Fisheries Management and Mitigation Strategy (FMMS). In addition, advisory safety zones will be established, the details of the development will be published in Notice to Mariners and included on updated nautical charts.</p> <p>Adoption of the management plans listed above will reduce potential impacts on other marine activities to no higher than moderate (not significant).</p> <p>Please refer to the Commercial Fisheries Chapter, Volume 4, Chapter 17: Shipping and Navigation (hereafter referred to as the ‘Shipping and Navigation Chapter’), Volume 4, Chapter 20: Infrastructure and Other Users (hereafter referred to as the ‘Infrastructure and Other Users Chapter’), and Volume 5, Chapter 33: Socio-Economic, Tourism and Recreation (hereafter referred to as the ‘Socio-Economic, Tourism and Recreation Chapter’) for further information on the co-existence of the proposed development with the relevant users of the marine environment.</p> <p>The project design and the implementation of the management plans ensure compliance with the Co-existence Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Infrastructure			
Infrastructure Policy 1	Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.	Yes	<p>The construction of the offshore elements of the proposed development will create approximately 740 and 1,360 full time equivalent direct and indirect jobs respectively. Regionally this results in 416 direct jobs and 765 indirect jobs after factoring in leakage and displacement.</p> <p>It is anticipated that the operational phase will employ approximately 1,530 and 2,570 full time equivalent (FTE) direct and indirect jobs respectively. Regionally this results in 1,033 direct jobs and 1,735 indirect jobs after factoring in leakage and displacement. See the Socio-Economic, Tourism and Recreation Chapter for further information.</p> <p>The proposed development will indirectly facilitate the diversification or regeneration of marine industries, in compliance with Infrastructure Policy 1.</p>
Social-Engagement with the Sea			
Access			
Access Policy 1	<p>Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts on public access</li> </ul>	Yes	<p>The proposed development has the potential to impact on tourism and recreation during the construction and operational phases. The offshore and onshore development areas overlap with areas used for tourism and recreation.</p> <p>Recreation is assessed in the Infrastructure and Other Users Chapter and in the Socio-Economic, Tourism and Recreation Chapter. These assessments include mitigation measures where necessary and conclude that there will be no significant adverse impacts on public access, tourism or recreation as a result of the proposed development.</p> <p>Therefore, the proposed development complies with Access Policy 1.</p>
Access Policy 2	Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider the future provision of services for tourism and recreation activities, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.	Yes	<p>Though not a tourist development, it is anticipated that there will be opportunities for marine tourism which will allow tourists to visit the offshore development area. Recreation is assessed in the Infrastructure and Other Users Chapter and the Socio-Economic, Tourism and Recreation Chapter.</p> <p>Therefore, the proposed development indirectly complies with Access Policy 2.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Employment			
Employment Policy 1	<p>Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are:</p> <ul style="list-style-type: none"> <li>• in line with the skills available in Irish coastal communities adjacent to the maritime area</li> <li>• improve the sustainable use of natural resources</li> <li>• diversify skills to enable employment in emerging industries</li> </ul>	Yes	<p>The construction of the offshore elements of the proposed development will create direct employment opportunities for approximately 740 individuals and indirect opportunities for approximately 1360. Construction of the onshore infrastructure of the proposed development will create a further 250 full time equivalent jobs. Approximately 15 full time equivalent jobs, some of which will local and marine related, will be created to facilitate the operation of the proposed development.</p> <p>Further information on the need for the proposed development is presented in Volume 2, Chapter 4: The Need for the Proposed Development (hereafter referred to as the 'Need for the Proposed Development Chapter'). Socio-economic benefits of the proposed development are presented in the Socio-Economic, Tourism and Recreation Chapter.</p> <p>In addition, it is anticipated that there may be opportunities for marine tourism, thereby indirectly creating independent employment opportunities for local individuals from the Irish coastal communities.</p> <p>The proposed development will contribute to a net increase in marine employment. to comply with Employment Policy 1.</p>
Heritage Assets			
Heritage Assets Policy 1	<p>Proposals that demonstrate they will contribute to enhancing the significance of heritage assets will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals unable to contribute to enhancing the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate harm to the significance of heritage assets and</li> <li>• if it is not possible, to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. (see definition of 'Public Benefits' in the Glossary)</li> </ul>	Yes	<p>The installation of cables and foundations for WTGs, the OSP and the onshore grid facility has the potential to cause direct disturbance and/or damage to undiscovered artefacts of marine archaeological significance and terrestrial cultural heritage features.</p> <p>An assessment of these potential impacts has been undertaken in Volume 3, Chapter 18: Offshore Archaeology and Cultural Heritage and Chapter 25: Onshore Archaeology, Architectural and Cultural Heritage from an offshore and onshore perspective, respectively. The assessments have determined that no significant effects on heritage assets are expected (Sections 18.7 and 25.7, respectively).</p> <p>The main mitigation for the protection of known marine archaeological receptors will be avoidance.</p> <p>This will be achieved via the implementation and monitoring of archaeological exclusion zones (AEZs), which are proposed for identified high value offshore archaeological and cultural heritage receptors. In such zone no works will be undertaken. All high value receptors with a potential for impact will have a minimum 100m AEZ.</p> <p>A Protocol for Archaeological Discoveries (PAD) will be implemented for the construction phase. The PAD is part of the Offshore EMP. The PAD is a system for reporting and investigating unexpected archaeological discoveries encountered during the different phases of the project, with a retained archaeologist providing guidance and advising the contractor on the implementation of the PAD.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			<p>The PAD also makes provision for the implementation of temporary exclusion zones around areas of possible archaeological interest, for prompt archaeological advice, and, if necessary, for archaeological inspection of important features prior to further activities in the vicinity. The PAD provides a mechanism to comply with legislation, including notification to the National Monuments Service.</p> <p>The Cultural Heritage Strategy (Appendix 25.4) provides appropriate identification, recording and relevant protection measures of cultural heritage assets in the onshore development area.</p> <p>The assessment of the potential effects on marine and onshore cultural heritage determined that there will not be any significant effect on heritage assets.</p> <p>The proposed development complies with the Heritage Assets Policy 1.</p>
<b>Rural Coastal and Island Communities</b>			
Rural Coastal and Island Communities Policy 1	Proposals contributing to access, communications, energy self-sufficiency or sustainability of rural coastal and / or island communities should be supported. Proposals should ideally be inclusive of continual education, skills development and training in marine sectors, thus improving the sustainability, social benefits and economic resilience of rural and island communities.	Yes	<p>The proposed development will be situated off the coasts of Counties Dublin, Meath and Louth. Approximately 740 direct full time equivalent (FTE) and 1,360 indirect FTE jobs will be required for the construction phase. A further 1,530 direct and 2,570 indirect FTE jobs will be required for the operation and maintenance of the proposed development.</p> <p>The developer will establish a Community Benefit Fund once the proposed development is in construction. It is estimated that the funding will reach approximately €80 million, approximately €4 million per annum for 20 years. The fund is expected to allow the local coastal communities to develop new and existing initiatives in their own areas, support existing local amenities and clubs, develop environmental and energy efficiency schemes, as well as the fishing industry.</p> <p>Further information on the Operation and Maintenance Facility is provided in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Volume 5, Chapter 32: Population and Human Health and the Socio-Economic, Tourism and Recreation Chapter address the socio-economic effects of the proposed development, including the community benefit fund.</p> <p>The proposed development complies with the Rural Coastal and Island Communities Policy 1</p>
<b>Seascape and Landscape</b>			
Seascape and Landscape Policy 1	<p>Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> </ul>	Yes	<p>Multiple photomontages were prepared at various stages during the design process. These photomontages were published on the Developer’s website (<a href="http://www.northirishsearray.ie">www.northirishsearray.ie</a>) and displayed during public consultation events. Further information on the public consultation and feedback received is presented in the Consultation Report (Appendix A1.2) of this EIAR.</p> <p>Photomontages were prepared and visualisation assessments were carried out. These are presented in Volume 5, Chapter 29: Seascape, Landscape and Visual (hereafter referred to as the ‘Seascape, Landscape and Visual Chapter’) and the appendices to the chapter.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>mitigate significant adverse impacts on the seascape and landscape of the area</li> <li>If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding.</li> </ul> <p>This policy should be included as part of statutory environmental assessments.</p>		<p>In the assessment, 52 representative viewpoints were selected and used to measure the magnitude of the impacts. The assessment concluded that the greatest significance of effect on the seascape and landscape of the area, and on visual amenity, will be major to moderate negative, which is not significant in EIA terms. The cumulative effect assessment carried out for the Seascape, Landscape and Visual Chapter concluded that the proposed development will contribute a Negligible or Low-negligible contribution to the overall cumulative effect from the southerly viewpoints (VP36 to VP47) and will not result in an overall significant cumulative effect (see Appendix A29.2 for further information).</p> <p>Therefore, the proposed development complies with Seascape and Landscape Policy 1.</p>
<b>Social Benefits</b>			
Social Benefits Policy 1	<p>Proposals that enhance or promote social benefits should be supported. Proposals unable to enhance or promote social benefits should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>minimise or</li> <li>mitigate significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits</li> </ul>	Yes	<p>The developer will establish a Community Benefit Fund which will be put in place once the proposed development is in construction. It is estimated that the funding will reach approximately €80 million, approximately €4 million per annum for 20 years which will directly enhance social benefits in the region of the proposed development.</p> <p>Further information on the proposed development's compliance of Social Benefits Policy 1 are provided in the Socio-Economic, Tourism and Recreation Chapter.</p> <p>The proposed development and the Community Benefit Fund associated with it directly align with Social Benefits Policy 1.</p>
Social Benefits Policy 2	<p>Proposals that increase the understanding and enjoyment of the marine environment (including its natural, historic, and social value), or that promote conservation management and increased education and skills, should be supported.</p>	No	<p>Social Benefits Policy 2 is not relevant to the proposed development as the project is not explicitly designed to increase the understanding and enjoyment of the marine environment.</p>
<b>Transboundary</b>			
Transboundary Policy 1	<p>Proposals that have transboundary impacts beyond the maritime area, on either the terrestrial environment or neighbouring international jurisdictions, must show evidence of consultation with the relevant public authorities, including terrestrial planning authorities and other country authorities. Proposals should consider transboundary impacts throughout the lifetime of the proposed activity.</p>	Yes	<p>Notifications of the application for permission for the proposed development have been sent to the Northern Ireland Department for Infrastructure Planning, the United Kingdom Department for Levelling Up, Housing and Communities, the Planning Directorate (Wales), Strategic Environmental Assessment Gateway (Scotland) and Isle of Man Department of Infrastructure.</p> <p>The proposed development is an offshore wind farm situated off the east coast of Ireland in the Irish Sea. Transboundary effects arising throughout the lifetime of the proposed development have been assessed in Volumes 3-5 of the EIAR. The assessments concluded that there will be no significant transboundary effects.</p> <p>Therefore, the proposed development complies with Transboundary Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
<b>KEY SECTORAL/ACTIVITY POLICIES</b>			
<b>Aquaculture</b>			
Aquaculture Policy 1	Proposals for sustainable development of aquaculture that: <ul style="list-style-type: none"> <li>demonstrate use of innovative approaches, and / or</li> <li>contribute to diversification of species being grown in a given locality, particularly proposals applying a multi-trophic approach, and / or</li> <li>enhances resilience to the effects of climate change should be supported</li> </ul>	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm and not a proposal for the sustainable development of aquaculture.
Aquaculture Policy 2	Non-aquaculture proposals in aquaculture production areas must demonstrate consideration of, and compatibility with, aquaculture production. Where compatibility is not possible, proposals must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> <li>avoid</li> <li>minimise</li> <li>mitigate significant adverse impacts on aquaculture</li> <li>If it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding</li> </ul>	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm with no aquaculture areas involved.
Aquaculture Policy 3	Land-based coastal infrastructure that is critical to and supports development of aquaculture should be supported, in accordance with any legal requirements and provided environmental safeguards contained within authorisation processes are fully met.	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm with no aquaculture areas involved.
<b>Defence and Security</b>			
Defence and Security - Policy 1	Any proposal that has the potential to interfere with the performance by the Defence Forces of their security and non-security related tasks must be subject to consultation with the Defence Organisation.  This includes potential interference with: <ul style="list-style-type: none"> <li>Safety of navigation and access to naval facilities</li> </ul>	Yes	The proposed development is in proximity to the Gormanston Danger Area EID1, through which the offshore export cable corridor (ECC) passes. The closest radar equipped military airfield is Casement Aerodrome. An assessment of impacts on these receptors is presented in Volume 3, Chapter 19: Aviation and Radar and the Infrastructure and Other Users Chapter.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>Firing, test or exercise areas</li> <li>Communication, and surveillance systems</li> <li>Fishery protection functions</li> </ul> <p>Proposals should only be supported where, having consulted with the Defence Organisation, they are satisfied that it will not result in unacceptable interference with the performance by the Defence Forces of their security and non-security related tasks.</p> <p>Any proposal will be subject to the relevant Environmental Assessments, as set out in the introduction to this NMPF.</p>		<p>Both the Irish Air Corps (IAC) and the Department of Defence (DoD) have been informed by the proposed development under the assumption that the WTGs will be detected on the Casement Primary Surveillance Radar (PSR).</p> <p>Consultation with the DoD will continue to ensure that construction, operation and decommissioning activities will not impact on activities within the Gormanston Danger Area EID1, the airspace of which used by the IAC as a firing range.</p> <p>The effect of the proposed development on the defence forces' military receptors is determined to be not significant. As the Developer and EIAR team have engaged with the DoD, the proposed development is in compliance with Defence and Security Policy 1.</p> <p>Following the receipt of RFI's, further consultation with the Department of Defence (DoD) was undertaken in June 2025. During this consultation DoD acknowledged that the proposed development will not significantly impact on the operation of Gormanston Military Practice and Exercise Area. Recommendations were provided which the Developer has considered within their assessment where relevant. Further detail on consultation is provided in Appendix 1.2.</p> <p>This information is considered within the assessment in Sections 19.3 and 19.5.</p> <p>Therefore, the proposed development satisfies the requirements of Defence and Security Policy 1.</p>
Energy - Emerging Technologies (Carbon Capture and Storage, and Hydrogen)			
n/a	NMPF notes that specific marine planning policy development will be considered in the future	No	There are no known carbon capture and storage or hydrogen projects in the proposed development area.
Energy - Natural Gas Storage			
Natural Gas Storage Policy 1	Subject to assessments required for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), natural gas storage proposals should be supported.	No	Natural Gas Storage Policy 1 is not relevant to the proposed development as the project is for an offshore wind farm with natural gas storage component.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Energy – Offshore Renewable Energy (ORE)			
ORE Policy 1	Proposals that assist the State in meeting the Government’s offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology, and other maritime users.	Yes	<p>The proposed development is an offshore wind energy project which will directly contribute to the Government’s offshore renewable energy targets. The contribution of a renewable electricity source on the east coast of Ireland will facilitate the long-term shift away from fossil fuel use and will increase Ireland’s energy security.</p> <p>The Need for the Proposed Development Chapter provides further information on how the proposed development will assist in meeting the Governments offshore renewable energy targets.</p> <p>Volumes 3 and 5 of the EIAR present a rigorous assessment of the impacts of the proposed development and the mitigation measures in relation to minimising impacts on the marine environment, marine ecology, and other maritime users.</p> <p>In conclusion, the proposed development is compliant with the objectives of the OREPolicy 1</p>
ORE Policy 2	Proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (OREDPA) and its successor. Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government’s 2030 targets will be prioritised for assessment under the new consenting regime. Into the future, areas designated for offshore energy development, under the Designated Marine Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting (or development of our marine resources) (Note – see Appendix D on Spatial Designation Process).	Yes	<p>Volume 2, Chapter 3: Legal and Policy Framework and the Need for the Proposed Development Chapter describe how the proposed development is consistent with national policy including the OREDPA in assisting the Government in meeting offshore renewable energy targets. The OREDPA identified assessment areas for offshore wind development in the Strategic Environmental Assessment. The proposed development is strategically positioned within Assessment Area 1) East Coast – North.</p> <p>The proposed development is deemed a Phase One Project under the Transition Protocol and therefore directly complies with ORE Policy 2.</p>
ORE Policy 3	Any non-ORE proposals that are in or could affect sites held under a permission or that are subject to an ongoing permitting or consenting process for renewable energy generation (wind, wave or tidal) should demonstrate that they will in order of preference: <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise</li> <li>• mitigate adverse impacts or</li> </ul>	No	ORE Policy 3 is not relevant to the proposed development as the project is an ORE proposal.

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	<ul style="list-style-type: none"> <li>if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</li> </ul> <p>Applicants for non-ORE proposals in or affecting ORE sites should engage ORE developers in consultation during the pre-application processes as appropriate.</p>		
ORE Policy 4	Decisions on ORE developments should be informed by consideration of space required for other activities of national importance described in the NMPF.	Yes	The proposed development has been carefully assessed alongside all other proposed and potential construction activities in the local area and each has been considered with potential cumulative effects. The interaction of the proposed development and other activities of national importance is also assessed within the Commercial Fisheries Chapter, Shipping and Navigation Chapter, Aviation and Radar Chapter and the Infrastructure and Other Users Chapter. The assessment of the impacts of proposed development on proposed and consented activities is provided in Volume 6, Chapter 38: Cumulative and Inter-Related Effects.
ORE Policy 5	Proposals for activity that may adversely impact ORE test projects by virtue of being within or adjacent to ORE test sites, or between site and landfall of ORE test projects that may adversely impact ORE test site projects, should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts.	No	ORE Policy 5 is not relevant to the proposed development as the project is an ORE proposal that will not affect other ORE projects.
ORE Policy 6	Proposals for infrastructure enabling local use of excess energy generated from emerging marine technologies (wave, tidal, floating wind) should be supported.	No	ORE Policy 6 is not relevant to the proposed development as the project is not for local infrastructure related to use of excess energy.
ORE Policy 7	Where potential for ports to contribute to ORE is identified, plans and policies related to this port must encourage development in such a way as to facilitate ORE and related supply chain activity.	Yes	<p>The proposed development will require a construction port, where the components will be stored and, in some instances, assembled before being transferred to the offshore development area. A Construction Port Assessment was carried out during the preparation of the EIAR, which identified a number of suitable ports both on the island of Ireland and Great Britain.</p> <p>For the Operation and Maintenance Facility, the current option under consideration is the adaption and leasing of part of an existing port facility at Greenore in Ireland.</p> <p>Whilst the Operation and Maintenance Facility is subjected to a separate planning/permitting consents, it is included in the cumulative impact assessment of the EIAR in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Further information is provided in Volume 2, Chapter 6: Description of the Proposed Development – Offshore (hereafter referred to as the ‘Offshore Description Chapter’).</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			The proposed development complies with ORE Policy 7.
ORE Policy 8	Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required.	Yes	Existing and potential future sub-sea cables were considered when defining the cable corridor and development boundary for the proposed development. A total of 6 cables and pipelines pass through the study area but none intersect the proposed development boundary.  Please refer to Volume 2, Chapter 5: Consideration of Alternatives, Volume 2: Chapter 8: Construction Strategy – Offshore (hereafter referred to as the ‘Offshore Construction Chapter’), Chapter 9: Construction Strategy – Onshore (hereafter referred to as the ‘Onshore Construction Strategy’); the Infrastructure and Other Users Chapter, and Volume 4, Chapter 26: Material Assets (hereafter referred to as the ‘Material Assets Chapter’) for further information.  Therefore, the proposed development adheres to the policy objectives inherent in ORE Policy 8.
ORE Policy 9	A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. Where a development consent is applied for in an area already subject to permission, proposals must include a visualisation assessment to inform design and layout.  Visualisation assessments should demonstrate consultation with communities that may be able to view the proposal, in addition to any other ORE development, which had received consent to proceed at a given site at the time the consent application is made, with the aim of minimising impact. Visualisation assessments will be informed by specific emerging guidelines (detailed in the actions set out in Annexes to this NMPF).  Prior to specific guidelines being available, policy and best practice relating to visualisation assessment should be used. This consideration must be included as part of statutory environmental assessments where such assessment is required.	Yes	Visualisation assessments were carried out and are presented in the Seascape, Landscape and Visual Chapter in accordance with the following guidelines: <ul style="list-style-type: none"> <li>• 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)</li> <li>• Scottish Natural Heritage (SNH) (now known as NatureScot), Offshore Renewables – Guidance on assessing the impact on coastal landscape and seascape, Guidance for Scoping an Environmental Statement (SNH, 2012)</li> <li>• SNH (NatureScot), Visual Representation of Wind Farms Guidance (SNH, 2017a)</li> <li>• SNH (NatureScot), Siting and Designing Wind Farms in the Landscape (SNH, 2017b)</li> <li>• SNH (NatureScot), NatureScot (2021) Guidance - Assessing the cumulative landscape and visual impact of onshore wind energy developments (also identified as applicable to the cumulative effects of offshore wind energy developments) and</li> <li>• Department of the Environment, Heritage and Local Government (DEHLG), Wind Energy Development Guidelines (2006 / 2019) Draft Revised</li> <li>• Guidance and Toolkit for Impact Assessments in a World Heritage Context (UNESCO, 2022)</li> <li>• Guidance for Wind Energy Projects in a World Heritage Context (UNESCO, 2023)</li> </ul> As part of the pre-application process, multiple photomontages were prepared at various stages during the design process. These photomontages were published on the Developer’s website ( <a href="http://www.northirishsearray.ie">www.northirishsearray.ie</a> ) and displayed during public consultation events.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			Further information on the public consultation and feedback received is presented in the Consultation Report (Appendix 1.2) of this EIAR. Therefore, the proposed development adheres to the policy objectives inherent in ORE Policy 9.
ORE Policy 10	Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible.	No	The proposed project is not a land use plan or policy. ORE Policy 10 is not relevant.
ORE Policy 11	Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.	Yes	The flexibility provided by the DF Opinion will enable the proposed development to avail of emerging renewable energy technologies and associated supply chains.
<b>Energy – Petroleum</b>			
Petroleum Policy 1	Proposals in areas where petroleum activities or petroleum production infrastructure have already been approved, or where applications consistent with the Government’s prohibition on new exploration activity are under consideration, should only be authorised where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or the proposal is clearly of strategic or national importance.  Compatibility should be achieved, in order of preference, through: <ul style="list-style-type: none"> <li>• avoiding, or</li> <li>• minimising, or</li> <li>• mitigating adverse impacts.</li> <li>• If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</li> </ul>	No	The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist.
Petroleum Policy 2	Proposals potentially affecting future potential activity in areas (blocks) subject to existing petroleum authorisations should avoid sterilisation of that area for future petroleum-related activity consistent with Government policy, and demonstrate how they, in order of preference: <ul style="list-style-type: none"> <li>• avoid, or</li> </ul>	No	The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>• minimise, or</li> <li>• mitigate potential adverse impacts on those activities.</li> <li>• If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</li> </ul>		
Energy – Transmission			
Transmission Policy 1	<p>Subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland’s energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations.</p> <p>This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government’s target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system / interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems.</p>	No	Transmission Policy 1 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission project.
Transmission Policy 2	<p>Proposals for activities that are in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for energy transmission proposals should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise</li> <li>• mitigate adverse impacts, or</li> <li>• if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</li> </ul>	No	Transmission Policy 2 is not relevant to the proposed development as the proposed development will not be in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for energy transmission proposals. See the Infrastructure and Other Users Chapter for more details on offshore infrastructure in the vicinity of the proposed development.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Transmission Policy 3	Decisions on transmission developments should be informed by consideration of space required for other activities of national importance described in the NMPF.	No	Transmission Policy 3 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission development.
Transmission Policy 4	Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies.  Designation of land-based zones for the purposes of co-ordination and integration with relevant Marine Plans must be considered, where appropriate.	No	Transmission Policy 4 is not relevant to the proposed development as it is an ORE development which does not include any facilitation of energy transmission projects.
Transmission Policy 5	Proposals for construction or operation activities within one nautical mile of either of the two existing natural gas interconnector pipelines shall be avoided.  If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered.  If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures be put in place or the proposed activities altered.	Yes	The closest point of the offshore development area is situated 0.52km (0.28nm) from Interconnector 2 Scotland to Ireland (IC2) with the nearest WTG located 949m (0.51nm) /880m (0.48nm) in Project Option 1 and Project Option 2 respectively. The interaction with the construction phase of the proposed development and IC2 is assessed in the Infrastructure and Other Users Chapter. The direct displacement or access impacts on subsea cables and pipelines (including IC2) associated with increased vessel movements and the use of Advisory Safety Zones could result in a slight effect, from the construction of the proposed development which is not significant in EIA terms.  Post-submission consultation with Gas Networks Ireland focused on the relationship between the proposed development and existing offshore gas infrastructure, with a focus on Interconnector 2 in accordance with RFI Section 16. Following that consultation, the Developer completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which has been shared with GNI in January 2026 and which proposes appropriate mitigation measures to conclude that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practicable (ALARP) methodology.  The onshore cable will cross IC2 twice and Interconnector 1 (IC1) once. The views of Gas Networks Ireland in relation to how such activities could impact the pipelines will be taken into account. The pipeline crossing works will be undertaken in accordance with the Gas Networks Ireland GNI Safety Advice for Working in the Vicinity of Gas Pipelines (2016). A Gas Networks Ireland (GNI) inspector will be present for the duration of the pipeline crossing works to ensure adherence to the Gas Networks Ireland procedures.  In conclusion, the proposed development has met the objectives of Transmission Policy 5.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Transmission Policy 6	Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation of fracked gas, additional proposals for natural gas transmission/ import infrastructure should be supported.	No	Transmission Policy 6 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission project.
<b>Fisheries</b>			
Fisheries Policy 1	Proposals that may have significant adverse impacts on access for existing fishing activities, must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> <li>• avoid,</li> <li>• minimise, or</li> <li>• mitigate such impacts.</li> <li>• If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.</li> </ul>	Yes	The impacts of the proposed development on the access for existing commercial fisheries activities was assessed. Please refer to the Commercial Fisheries Chapter for a full impact assessment on the predicted impacts on the commercial fishing industry.  The fisheries activities included in the assessment are Irish and UK demersal otter trawlers, Irish potting vessels, Irish razor clam, mussel and scallop dredgers, UK scallop dredgers, Irish and Belgian beam trawlers, and Irish pelagic trawlers and demersal seine fisheries.  Upon implementation of the Fisheries Management and Mitigation Strategy (FMMS, Appendix A16.2), (developed in consultation with the fishing industry), all residual effects are expected to be not significant (Section 16.7). The FMMS also includes a preliminary Technical Co-existence Assessment that concludes that coexistence is technically achievable, provided that appropriate corridor design, cable burial standards, fisheries-informed operational protocols and monitoring measures are incorporated into project design and management  This ensures compliance with Fisheries Policy 1.
Fisheries Policy 2	Where significant impact upon fishing activity arising from any proposal is identified, a Fisheries Management and Mitigation Strategy (FMMS) should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and other interests as appropriate. All efforts should be made to agree the FMMS with those interests.  Those interests should also undertake to engage with the proposer and provide best available, transparent and accurate information and data in a timely manner to help complete the FMMS. The FMMS should be drawn up as part of readying a proposal prior to submission, with measures identified to be considered in finalising conditions of any authorisations granted.	Yes	A FMMS will be prepared in consultation with the local fishing interests. (refer to Volume 9, Appendix 16.2)  Upon implementation of the FMMS all residual significant effects on fishing activities are not expected to be significant (Section 16.7). This ensures compliance of the proposed development with Fisheries Policy 3.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<p>Development of the strategy should be coordinated with other relevant assessments such as EIA where possible.</p> <p>The content of the Fisheries Management and Mitigation Strategy (FMMS) should be relevant to the particular circumstances and could include:</p> <ul style="list-style-type: none"> <li>• An assessment of the potential impact of all stages of the development or other suggested use on the affected fishery or fisheries, both in socio-economic terms and in relation to environmental sustainability. This assessment should include consideration of any impact upon cultural identity within fishing communities, as well as identifying indirect / in-combination matters.</li> <li>• A recognition that the disruption to existing fishing opportunities / activity should be minimised as far as possible.</li> <li>• Demonstration of the public benefit(s) that outweigh the significant impacts identified.</li> <li>• Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity.</li> <li>• Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socio-economic impacts.</li> <li>• Where it does not prove possible to agree the FMMS with all interests:</li> <li>• Divergent views and the reasons for any divergence of views between the parties should be fully explained in the FMMS, and dissenting views should be given a platform within the said FMMS to make their case.</li> <li>• Where divergent views are identified, relevant public authorities should be engaged to identify informal and formal steps designed to enable proposal(s) to progress.</li> </ul>		

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Fisheries Policy 3	Proposals that enhance the sustainability of fisheries or support a sustainable fishing industry, including the industry's diversification and or enhanced resilience to the effects of climate change, should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	No	Fisheries Policy 3 is not relevant to the proposed development as the project is not designed to enhance fishery sustainability.
Fisheries Policy 4	Infrastructural proposals that enable access to fishing activities should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	No	Fisheries Policy 4 is not relevant to the proposed development as the project is not designed to enhance access to fishing activities.
Fisheries Policy 5	Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. If proposals cannot enhance essential fish habitat, they must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> <li>• avoid,</li> <li>• minimise,</li> <li>• mitigate significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes.</li> <li>• If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.</li> </ul>	Yes	<p>The proposed development will not enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported.</p> <p>The impact of the proposed development on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes has been assessed in the Benthic and Intertidal Ecology and Fish and Shellfish Ecology chapters. The assessments determined that residual effects of the proposed development on benthic and intertidal habitats and species and fish and shellfish species would not be significant.</p> <p>Impacts to important habitats have been assessed for compliance against the four thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) from the Marine Strategy Framework Directive (MSFD). This is provided in Appendix A3.2: Marine Strategy Framework Directive Assessment and it concludes that the proposed development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status</p> <p>This ensures compliance with Fisheries Policy 5.</p>
Fisheries Policy 6	Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to discuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.	No	Fisheries Policy 6 is not relevant to the proposed development as the project is not a port or harbour development.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Mineral Exploration and Mining			
Mineral Exploration and Mining Policy 1	Only proposals which are in line with national policy on mineral exploration and mining should be considered, provided they fully meet the environmental safeguards contained within the mineral exploration and mining consent processes.	No	The Mineral Exploration and Mining policy is not relevant to the proposed development as the project contains no mining or mineral exploration aspects.
Ports, Harbours and Shipping			
Ports, Harbours and Shipping Policy 1	<p>To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use:</p> <ul style="list-style-type: none"> <li>• The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes;</li> <li>• A mandatory Navigation Risk Assessment;</li> <li>• Where interference is likely: whether reasonable alternatives can be identified and</li> <li>• Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organisation can be achieved at no significant cost to the shipping or ports sector</li> </ul>	Yes	<p>Impacts of the proposed development on navigation, ports and anchorages are assessed in Section 17.5 of the Shipping and Navigation Chapter. The assessment included a Navigational Risk Assessment (NRA) (Appendix 17.1 of Volume 9).</p> <p>Mitigation and monitoring measures relevant to shipping and navigation during the construction phase will include:</p> <ul style="list-style-type: none"> <li>• advisory safety zones;</li> <li>• advisory safe passing distances;</li> <li>• buoyed construction area;</li> <li>• compliance with relevant regulator guidance;</li> <li>• guard vessel(s) as required;</li> <li>• liaison with Irish Coast Guard in relation to search and rescue (SAR) resources;</li> <li>• lighting and marking;</li> <li>• marine coordination for project vessels;</li> <li>• marking on nautical charts;</li> <li>• project vessel compliance with international marine regulations; and</li> <li>• promulgation of information.</li> </ul> <p>The Shipping and Navigation Chapter assessed potential impacts on vessel displacement, collision risk, reduced access during construction, operation and decommissioning and additionally allision risk, reduction in under keel clearance, anchor interaction and emergency response capabilities during operation. The resulting residual effect was either tolerable with mitigation or broadly acceptable, which are not significant in EIA terms. Therefore, the proposed development complies with Ports, Harbours and Shipping Policy 1.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Ports, Harbours and Shipping Policy 2	<p>Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise or</li> <li>• mitigate significant adverse impacts and</li> <li>• if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding</li> </ul>	Yes	<p>Impacts associated with safety of port operations and access are assessed in Section 17.5 of the Shipping and Navigation Chapter.</p> <p>The significance of the effect from the impact of the proposed development during construction, operation and decommissioning on current port activity (i.e. access to local ports) is determined to be broadly acceptable and As Low As Reasonably Practicable (ALARP), which is not significant in EIA terms.</p> <p>Therefore, the proposed development complies with Ports, Harbour and Shipping Policy 2.</p>
Ports, Harbours and Shipping Policy 3	<p>Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate consideration of the National Ports Policy, the National Planning Framework, and relevant provisions related to the TEN-T network.</p>	Yes	<p>An Operation and Maintenance Facility will be required for the proposed development. The current option under consideration is the adaption and leasing of part of an existing port facility at Greenore in Ireland. Whilst the Operation and Maintenance Facility is subjected to a separate planning/permitting consents, it is included in the cumulative impact assessment of the EIAR in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Further information is provided in the Offshore Description Chapter.</p> <p>The modification and use of Greenore port would be in compliance with Ports, Harbours and Shipping Policy 3.</p>
Ports, Harbours and Shipping Policy 4	<p>Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have:</p> <ul style="list-style-type: none"> <li>• been informed by consultation at pre-application stage or earlier with the relevant port authority</li> <li>• have carried out a navigational risk assessment including an analysis of maritime traffic in the area and</li> <li>• have consulted Department of Transport, MSO and Commissioners of Irish Lights</li> </ul> <p>Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process.</p>	Yes	<p>Key stakeholders were consulted and feedback from consultation is included within Section 4 of the Navigation Risk Assessment. The consultees included the Department of Transport, Marine Survey Office, Commissioners of Irish Lights and the Irish Coast Guard, and Dublin Port Company and Drogheda Port Company as local ports.</p> <p>The Navigation Risk Assessment also includes analysis of vessel traffic in the area based on multiple data sources. Therefore, the proposed development aligns with Ports, Harbours and Shipping Policy 4.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Ports, Harbours and Shipping Policy 5	Proposals for capital dredging will be supported where it is necessary to safeguard national port capacity and Ireland's international connectivity, and where required compliance assessments associated with authorisations have been carried out and incorporated into subsequent competent authority decision(s).	No	Ports, Harbours and Shipping Policy 5 is not relevant to the proposed development as the project is not a dredging proposal.
Ports, Harbours and Shipping Policy 6	In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity.	No	Ports, Harbours and Shipping Policy 6 is not relevant to the proposed development as the project is not situated in areas of authorised dredging activity.
Ports, Harbours and Shipping Policy 7	Proposals for maintenance dredging activity will be supported where: <ul style="list-style-type: none"> <li>relevant decisions by competent authorities incorporate the outcome of statutory environmental assessment processes, as well as necessary compliance assessments associated with authorisations, including in relation to the planning process</li> <li>there will be no significant adverse impact on marine activities or uses or the maritime area. Any potential adverse impact will be, in order of preference, avoided, minimised or mitigated</li> <li>dredged waste is managed in accordance with internationally agreed hierarchy of waste management options for sea disposal</li> <li>if disposing of dredged material at sea, existing registered disposal sites are used, in preference to new disposal sites and</li> <li>where they contribute to the policies and objectives of this NMPF</li> </ul>	No	Ports, Harbours and Shipping Policy 7 is not relevant to the proposed development as the project is not a proposal for maintenance dredging.
Ports, Harbours and Shipping Policy 8	Proposals that cause significant adverse impacts on licensed disposal areas should not be supported. Proposals that cannot avoid such impact must, in order of preference <ul style="list-style-type: none"> <li>minimise</li> <li>mitigate or</li> </ul>	No	Ports, Harbours and Shipping Policy 8 is not relevant to the proposed development as the project is not situated in a licensed disposal area.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding</li> </ul>		
Ports, Harbours and Shipping Policy 9	Proposals for the management of dredged material must demonstrate that they have been assessed against the waste hierarchy (see Glossary).	No	As a result of the design refinements (see Appendix A5.1), there are no dredging activities required for the construction of the proposed development. Therefore, Ports, Harbours and Shipping Policy 9 is no longer relevant to the proposed development as there will be no dredged material to be managed.
Ports, Harbours and Shipping Policy 10	<p>Proposals identifying new dredge disposal sites which are subject to best practice and guidance from previous studies should be supported where:</p> <ul style="list-style-type: none"> <li>competent authority decisions incorporate necessary compliance assessments associated with authorisations and</li> <li>they contribute to the policies and objectives of this NMPF.</li> </ul> <p>Proposals must include an adequate characterisation study, be assessed against the waste hierarchy and must be informed by consultation with all relevant stakeholders</p>	No	Ports, Harbours and Shipping Policy 10 is not relevant to the proposed development as it does not identify new dredge disposal sites.
<b>Safety at Sea</b>			
Safety at Sea Policy 1	<p>Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will:</p> <ul style="list-style-type: none"> <li>Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout and</li> <li>Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels.</li> </ul>	Yes	<p>Impacts to commercial and recreational vessels are assessed in Section 17.5 of the Shipping and Navigation Chapter, including in relation to changes in navigable sea room and WTG blade air gap, with no significant effects identified.</p> <p>Measures to minimise the navigational risk between commercial vessels arising from an increase in the density of vessels in the maritime space as a result of the wind farm are presented in the Shipping and Navigation Chapter and the Navigational Risk Assessment (Appendix A17.1) of the EIAR. For mitigation measures specifically, please refer to Section 17.6.</p> <p>Measures to minimise the navigational risk arising between recreational and commercial vessels by redirecting recreational vessels are included in the Shipping and Navigation Chapter and the Infrastructure and Other Users Chapter of the EIAR.</p> <p>With the implementation of measures included within the EIAR, it is concluded the proposed development does not pose a significant navigational risk. In conclusion, the proposed development is compliant with the objectives of the Safety at Sea Policy 1</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Safety at Sea Policy 2	<p>Proposals for infrastructure that have the potential to significantly reduce under-keel clearance must demonstrate how they will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> <li>• minimise</li> <li>• mitigate adverse impacts or</li> <li>• if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</li> </ul>	Yes	<p>For the proposed development, inter-array and export cables will have a typical burial depth of between 1 - 3m.</p> <p>Seabed burial will be the primary means of cable burial and the burial depth plus any external cable protection will be determined by the CBRA.</p> <p>There is a higher risk of an under-keel clearance effect with the export cables when compared to the inter-array cables. This is due both to the export cables being in shallower water and increased crossing traffic volumes. Baseline surveys indicated that vessel traffic in transit through the ECC was low and the majority of vessels cross the ECC perpendicularly thus minimising the overall exposure to any underwater collision risk. This will be managed through the CBRA process. See the Shipping and Navigation Chapter for further information.</p> <p>The probability of an underwater collision occurrence has been assessed to be extremely unlikely or negligible (in respect to inter-array cables) and the reduction in under-keel clearance is considered broadly acceptable and ALARP, which is not significant in EIA terms.</p> <p>Therefore, the proposed development complies with Safety at Sea Policy 2.</p>
Safety at Sea Policy 3	All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.	Yes	<p>As per Section 17.6 of the Shipping and Navigation Chapter, lighting and marking of the array will comply with the requirements of with the Commissioners for Irish Lights and with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. Further information is provided in the Lighting and Marking Plan (LMP) included in Appendix 17.1 of Volume 9.</p> <p>Therefore, the proposed development complies with the objectives of Safety at Sea Policy 3.</p>
Safety at Sea Policy 4	Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.	Yes	<p>As per Section 17.6 of the Shipping and Navigation Chapter, lighting and marking of the array will comply with the requirements of the Commissioners for Irish Lights and with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. Further information is provided in the Lighting and Marking Plan (LMP) included in Appendix 17.1 of Volume 9.</p> <p>Therefore, the proposed development complies with the objectives of Safety at Sea Policy 3.</p>
Safety at Sea Policy 5	<p>Proposals must identify their potential impact, if any, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. Where a proposal may have a significant impact on these operations it must demonstrate how it will, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid</li> </ul>	Yes	<p>Potential impacts to SAR have been assessed within Section 17.5 of the Shipping and Navigation Chapter and have been determined to be tolerable with mitigation and ALARP, which is not significant in EIA terms. The Developer is committed to working within the parameters of MGN 654, including ID marking as well as lighting and marking in liaison with the IRCG, to minimise impacts.</p> <p>The most likely consequences in the event of a SAR operation is that SAR assets are able to fulfil their objectives without any limitations on capability.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>minimise</li> <li>mitigate adverse impacts or</li> <li>if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding, supported by parties responsible for maritime SAR</li> </ul>		<p>As part of the scenario deemed to have the greatest likely significant effect, it may not be possible to undertake an effective search. However, given compliance with MGN 654 for the layout, this is considered highly unlikely.</p> <p>Overall, relevant embedded mitigation measures are compliant with relevant regulator guidance, liaison with IRCG in relation to SAR resources, lighting and marking, marine coordination for proposed development vessels, proposed development vessel compliance with international marine regulations and WTG design/layout.</p> <p>Therefore, the proposed development aligns with Safety at Sea Policy 5.</p>
<b>Sport and Recreation</b>			
Sport and Recreation Policy 1	Proposals that promote sustainable development of water-based sports and marine recreation, while enhancing community health, wellbeing and quality of life, should be supported, provided that due consideration is given to environmental carrying capacities and tourism pressures.	No	Sport and Recreation Policy 1 is not relevant to the proposed development as the proposal is not designed to promote development of water-based sports and marine recreation.
Sport and Recreation Policy 2	<p>Proposals should demonstrate the following in relation to potential impact on recreation and tourism:</p> <ul style="list-style-type: none"> <li>The extent to which the proposal is likely to adversely impact sports clubs and other recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure</li> <li>The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety</li> <li>The extent to which the proposal is likely to adversely impact on the natural environment</li> </ul>	Yes	<p>The site of proposed development is in an area of relatively high marine usage. However, there are no sailing clubs, marinas, wind, kite or wave surf clubs within the study area. Recreational facilities have been assessed in the Infrastructure and Other Users Chapter. No potential likely significant effects have been identified on marine recreational users.</p> <p>The developer proposes to create and ensure implementation by the contractor of a Vessel Management Plan (VMP) which includes navigational safety measures and promulgation of information will further ensure impacts and risks are managed to an acceptable level. Additionally, advisory safety zones and details of the development may be published in Notice to Mariners (where deemed appropriate).</p> <p>Please refer to the Infrastructure and Other Users Chapter and the Socio-Economic, Tourism and Recreation Chapter for further detail.</p> <p>The design of the proposed development and further mitigations plans ensure compliance with the Sports and Recreation Policy 2.</p>
Sport and Recreation Policy 3	Opportunities to promote inclusive development of water-based sports and marine recreation should be supported, where appropriate and at the applicable scale, with a focus on facilities for people with disabilities.	No	Sport and Recreation Policy 3 is not relevant to the proposed development as the proposal is not designed to promote inclusive development of water-based sports and marine recreation.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Sport and Recreation Policy 4	Proposals that improve access to marine and coastal resources for tourism activities, and sport and recreation should be supported, where appropriate, at the applicable scale and aligned with existing development plans.	No	Sport and Recreation Policy 4 is not relevant to the proposed development as the proposal is not designed to increase access to marine and coastal resources for sports and marine recreation.
Sport and Recreation Policy 5	Proposals should seek to enhance water safety through provision of appropriate International Organization for Standardization (ISO) and European Committee for Standardization (CEN) compliant safety signage. In general, the safety of persons should be a key consideration for planners and due consideration should be given to best practice guidance for marine and coastal recreation areas endorsed by the Visitor Safety in the Countryside Group.	Yes	Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established. Advisory safety zones of 50m will be sought for incomplete structures where construction activity may be temporarily paused (and therefore the 500m safety zone has lapsed) such as installed foundations or where construction works are completed but the WTGs have not yet been commissioned in compliance with MGN 645. Further information on the design and implementation of water safety protocols for the proposed development is presented in the Offshore Description Chapter, the Offshore Construction Chapter, the Shipping and Navigation Chapter, the Navigational Risk Assessment (Appendix 17.1 of Volume 9) and the Lighting and Marking Plan (Appendix 17.4 of Volume 9). The design and implementation of safety protocols ensure the compliance of the proposed development with Sport and Recreation Policy 5.
<b>Telecommunications</b>			
Telecommunications Policy 1	Proposals that guarantee existing and future international telecommunications connectivity which is critically important to support the future needs of society, Government, the provision of Public Services and enterprise in Ireland, should be supported.	No	Telecommunications Policy 1 is not relevant to the proposed development as the proposal is not designed to explicitly guarantee existing and future international telecommunications connectivity due to its main objective being the transmission of power.
Telecommunications Policy 2	Preference should be given to proposals where evidence is provided of an integrated approach to development and activity, such as the bundling of cables (electricity and communications) where suitable, as well as pipelines for multiple activities, to minimise impacts on the marine environment, infrastructures and other users. Compatibility should be achieved, in order of preference, through: <ul style="list-style-type: none"> <li>• avoiding or</li> <li>• minimising or</li> <li>• mitigating adverse impacts, or</li> </ul>	Yes	There are no proposed third-party cables which could be bundled with the proposed development's cables. Known and potentially future sub-sea cable assets and onshore cable assets within the proposed development area have been identified. A total of 6 cables and pipelines that cross the study area but none come within the proposed development boundary. Please refer to the Offshore Construction Chapter, the Onshore Construction Strategy; the Infrastructure and Other Users Chapter and the Material Assets Chapter. Cable installation methodology, as well as the burial depth and any requirement for protection measures, will be defined by a detailed CBRA. The export and inter-array cables are likely to be buried. The burial depth will ensure that the cable is adequately protected against scour and damage from activities such as potential laying of other cables in the future.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<ul style="list-style-type: none"> <li>If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding</li> </ul>		The proposed development will be compliance with the NMPF Telecommunications Policy 2
Telecommunications Policy 3	Preference should be given to proposals that protect submarine cables whilst achieving successful seabed user coexistence, such as the bundling of cables (electricity and communications) as well as pipelines for multiple activities where suitable. Proposals should specify if separate access to cables for the purposes of repair and maintenance is required. With regard to decommissioning redundant submarine cables, a risk-based approach should be applied with consideration given to cables being left in situ where this would minimise significant impacts on the physical, natural, societal, historic, and economic value of the area.	Yes	<p>A total of six cables and pipelines belonging to other users transect the study area, but none physically overlap with the proposed development boundary. Therefore, the proposed development aligns with Telecommunications Policy 3.</p> <p>Please refer to the Offshore Construction Chapter, the Onshore Construction Strategy, the Infrastructure and Other Users Chapter, and the Material Assets Chapter.</p>
Telecommunications Policy 4	Proposals that ensure and enhance connectivity of Ireland’s rural and island communities to high quality telecommunications networks should be supported.	No	Telecommunications Policy 4 is not relevant to the proposed development as the proposal is not related to telecommunication connectivity.
<b>Tourism</b>			
Tourism Policy 1	Where appropriate, proposals enabling, promoting, or facilitating sustainable tourism and recreation activities, particularly where this creates diversification or additional utilisation of related facilities beyond typical usage patterns, should be supported.	No	Tourism Policy 1 is not relevant to the proposed development as the proposal is not designed to promote or facilitate sustainable tourism and recreation activities.
Tourism Policy 2	Proposals must identify possible impacts on tourism. Where a potential significant impact upon tourism is identified it should be demonstrated how the potential negative consequences to tourism in communities will be minimised. This must include assessment of how the benefits of proposals are not outweighed by potential negative impacts.	Yes	<p>The effects of the proposed development on tourism resulting from the construction, operation and decommissioning of the proposed development have been assessed in the Socio-Economic, Tourism and Recreation Chapter. The assessment concluded that there were no significant pre-mitigation effects on tourism arising from the proposed development.</p> <p>Additionally, the Developer has undertaken an assessment on the experiential concept of a “Sense of Place” following consultation with Fáilte Ireland. The assessment concluded that through the construction, operation and decommissioning phases of the proposed development, no significant effects will arise.</p> <p>Therefore, the proposed development aligns with Tourism Policy 2.</p>

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Tourism Policy 3	Proposals for tourism development should seek to optimise facilities and use of space by taking a cross-sectoral development approach that provides for multiple activities, whilst minimising the extent to which the proposal is likely to adversely impact on the natural environment.	No	Tourism Policy 3 is not relevant to the proposed development as the proposal is not designed to develop tourism.
<b>Wastewater Treatment and Disposal</b>			
Wastewater Treatment and Disposal Policy 1	<p>Proposals by Irish Water related to the treatment and disposal of wastewater that:</p> <ul style="list-style-type: none"> <li>• service the social and economic development of the country under the National Planning Framework</li> <li>• resolve environmental issues at priority areas identified by the EPA</li> <li>• contribute to the realisation of the objectives of: <ul style="list-style-type: none"> <li>a. Ireland’s River Basin Management Plan 2018 – 2021</li> <li>b. The Water Services Policy Statement 2018 – 2025</li> <li>c. Marine Strategy Framework Directive 2012 - 2020</li> </ul> </li> </ul> <p>should be supported, provided they fully meet the environmental safeguards contained within relevant authorisation processes.</p>	No	Wastewater Treatment and Disposal Policy 1 is not relevant to the proposed development as the proposal is not from Irish Water.
Wastewater Treatment and Disposal Policy 2	<p>Proposals that have the potential to significantly adversely affect existing and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for by Irish Water should not be authorised unless:</p> <ul style="list-style-type: none"> <li>• compatibility with the existing, authorised, proposed or otherwise identified in consultations with Irish Water activity, can be satisfactorily demonstrated;</li> <li>• the proposal is clearly of strategic or national importance.</li> </ul>	No	Wastewater Treatment and Disposal Policy 1 is not relevant to the proposed development as the proposal has no impact on wastewater management or treatment.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	<p>Where possible, proposals that may affect Irish Water activities or plans should engage with Irish Water at the earliest available opportunity.</p> <p>Compatibility should be achieved, in order of preference, through:</p> <ul style="list-style-type: none"> <li>• avoiding adverse impacts on those activities; and / or</li> <li>• minimising impacts where they cannot be avoided; and / or</li> <li>• mitigating impacts where they cannot be minimised.</li> </ul>		

## 2. Conclusion

**In response to RFI 3 (d), 4, 12 (a), 16, and 17 (a) and in light of the design refinements made in response to consultation and the RFI (refer to Appendix A5.1: Design Refinements), this section has been reviewed and the key change to this section is the removal of text in relation to the potential bat population at Rockabill. Further survey was undertaken at Rockabill, as per RFI 15 (b), which concluded that there was no permanent roost on the island. Therefore, Section 2 of Appendix D of the 2024 Planning report shall be deleted in its entirety and replaced with:**

This report provides an assessment of the consistency of the proposed development with the policies and objectives of the NMPF.

The assessment concluded that through all phases, with the implementation of the mitigation measures proposed, the proposed development will further the objectives and policies of the NMPF with respect to Offshore Renewable Energy and will not adversely affect the attainment of the objectives and policies for the other key sectors.

In relation to the overarching biodiversity policies of the NMPF, avoidance, minimisation or embedded mitigation has been incorporated in the design of the proposed development, and further mitigation measures will be implemented as required, to reduce adverse effects on biodiversity receptors.

In addition, in relation to SLVIA, the EIAR concluded that the project will not have any significant negative impact by itself but when considered cumulatively with the southernly viewpoints (VP 36-47), a significant cumulative negative impact could not be ruled out.

No other significant impacts were identified in the carrying out of the EIAR in respect of the proposed development, either alone or when considered cumulatively with other projects.

The proposed development, which is of critical importance to the delivering of Ireland's climate goals, will not adversely affect the attainment of the overarching policies of the NMPF.