Addendum to the Environmental Impact Assessment Report

NISA

*North Irish Sea Array*

Volume 9 - Offshore Appendices

# Appendix A11.1
# Water Framework Directive Compliance Report

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North Irish Sea Array Windfarm Ltd

# Appendix A11.1 Water Framework Directive Compliance Assessment

North Irish Sea Array Offshore Wind Farm

## Confidentiality

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# Contents


11 Water Framework Directive ..... 6

11.1 Introduction ..... 7

11.2 Regulatory Background ..... 7

Water Framework Directive ..... 7

Protected Areas ..... 7

Bathing waters ..... 7

Shellfish waters directive ..... 8

Priority substances ..... 8

Nutrient sensitive waters ..... 8

Protected areas ..... 9

11.3 Methodology ..... 9

Overview ..... 9

Guidance ..... 9

Data Sources ..... 9

WFD Receptors ..... 10

11.4 Receiving Environment ..... 10

Water bodies ..... 10

Bathing Waters ..... 10

Shellfish Waters ..... 11

Nutrient Sensitive Areas ..... 11

Drinking Water Protected Areas ..... 11

Natura 2000 Protected Sites ..... 11

Assessment of WFD Receptors ..... 11

Project Activities ..... 11

Hydromorphology ..... 12

Benthic Habitats ..... 12

Fish ..... 12

Water Quality ..... 13

Suspended sediment concentration ..... 13

Dissolved oxygen ..... 15

Water clarity ..... 15

Sediment bound contaminants ..... 15
Conclusion ..... 15
Protected Areas ..... 15
Designated bathing water(s) ..... 15
Nutrient vulnerable zones ..... 16
*Nutrient vulnerable zones* ..... 16
Nutrient sensitive areas ..... 16
Natura 2000 protected sites ..... 16
Shellfish water protected area(s) ..... 16
Conclusion ..... 16
Marine Invasive and Non-Native Species ..... 17
Conclusions ..... 17
References ..... 18

## Figures

**No table of figures entries found.**

# Acronyms

| Abbreviation | Definition |
|---|---|
| AL | Action Levels |
| BW | Bathing Water |
| EIAR | Environmental Impact Assessment Report |
| EPA | Environmental Protection Agency |
| E. coli | Escherichia coli |
| EU | European Union |
| HDD | Horizontal Directional Drilling |
| MFE | Mass Flow Excavator |
| NISA | North Irish Sea Array |
| NVZ | Nitrate Vulnerable Zones |
| ECC | Offshore Export Cable Corridor |
| PSA | Particle Size Analysis |
| rBWD | revised Bathing Water Directive |
| RFI | Request for Further Information |
| SBJ | Suction Bucket Jacket |
| SSC | Suspended Sediment Concentration |
| UWWTD | Urban Waste Water Treatment Directive |
| WFD | Water Framework Directive |

# 11 Water Framework Directive

**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. Amendments are therefore required to Appendix 11.1: Water Framework Directive Compliance Assessment of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2 Consultation Report.**

**For the purposes of clarity, this document shall be read in conjunction with the Appendix 11.1 submitted as part of the 2024 EIAR.**

**Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR is 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 EIAR which is deleted, or quotations from other documents (as explicitly stated). Replacement text is in normal font.**

**Please note that the numbered paragraphs in this Addendum are used solely for referencing within this document and do not align with the numbering in Appendix 11.1: Water Framework Directive Compliance Assessment of the 2024 EIAR.**

**The sections relevant to Appendix A11.1 in the RFI are included below.**

In addition, a number of RFI sections relate to specific technical topics addressed within the relevant EIAR chapters. These topics have been updated through addenda to the relevant chapters. This document does not reproduce those detailed assessments, instead, it signposts the reader to the relevant EIAR chapters, including their associated addendum, where the full, updated assessments are provided.

| RFI Section | RFI | Relevance to Appendix |
|---|---|---|
| 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 | The timeframes associated with the RFI have necessitated a review of the datasets previously used in the 2024 EIAR to ensure any necessary updates to the baseline environment are captured. Therefore, a review of the baseline Water Framework Directive has been undertaken to comply with RFI 1 (b).<br>This approach ensures that the present document takes account of the most up-to-date scientific information submitted as part of the |

| | | |
|---|---|---|
| | support of the planning application remains relevant and appropriate at the point of submitting further information or to update same as required. | planning application documentation, in line with the requirements of RFI 1(b).<br><br>Accordingly, this document has considered the updates presented in the following EIAR addenda:<br>▪ Chapter 6: Description of Development;<br>▪ Chapter 8: Offshore Construction Strategy;<br>▪ Chapter 10: Marine Geology, Oceanography and Physical Processes;<br>▪ Chapter 11: Marine Water and Sediment Quality;<br>▪ Chapter 12: Benthic Subtidal and Intertidal Ecology;<br>▪ Chapter 13: Fish and Shellfish Ecology;<br>▪ Appendix A10.1: Marine Processes Review of Project Design Options; and<br>▪ Appendix A10.2: Physical Processes Modelling. |
| 1 (c) | The applicant is requested to confirm whether any on-going or additional surveying has been carried out since the application was lodged and, if so, the applicant is invited to submit any further survey data results and analysis and update the planning application documentation, as appropriate. | Additional benthic ecology surveys have been undertaken since submission of the application, as detailed in Appendix A12.1 (Benthic Ecology Survey Report 2025). Relevant outputs, including Particle Size Analysis (PSA) and physicochemical data, have been incorporated into the current assessment. These data have informed an updated characterisation of sediment quality and baseline conditions. |

## 11.1 Introduction

11.1.1 There are no changes to this section. Refer to the Introduction Heading under Section 11.1 of Appendix 11.1 in the 2024 EIAR.

## 11.2 Regulatory Background

### Water Framework Directive

11.2.1 There are no changes to this section. Refer to the Water Framework Directive Heading under Section 11.2 of Appendix 11.1 in the 2024 EIAR.

### Protected Areas

#### Bathing waters

**The key change required to this section is to update the reference to legislative amendments relating to Bathing Waters. These amendments do not materially affect the assessment. The following Paragraph 11.2.6 of Appendix 11.1 in the 2024 EIAR shall be deleted:**

11.2.2 *The rBWD has been transposed into Irish law through the Bathing Water Quality Regulations 2008 (S.I. 79 of 2008) and subsequently the Bathing Water Quality (Amendment) Regulations 2011 (S.I. 351 of 2011) (hereafter, the Bathing Water Regulations). Under the Bathing Water Regulations, local authorities are required to monitor bacterial pollution (such as Escherichia coli (E. coli) and intestinal enterococci (IE)) in water bodies, the presence of which may indicate pollution from sewage. An increase in these bacterial concentrations correlates to a decrease in the water quality. The outputs from this bacterial monitoring of Bathing Waters (BWs) are compiled by the EPA and submitted to the European Commission*.

**And be replaced with:**

11.2.3 The revised Bathing Water Directive (rBWD) has been transposed into Irish law through the Bathing Water Quality Regulations 2008 (S.I. No. 79 of 2008), as amended (hereafter, the Bathing Water Regulations). Under the Bathing Water Regulations, local authorities are required to monitor bacterial pollution (such as Escherichia coli (*E. coli*) and intestinal enterococci (IE)) in water bodies, the presence of which may indicate pollution from sewage. An increase in these bacterial concentrations correlates to a decrease in the water quality. The outputs from this bacterial monitoring of Bathing Waters (BWs) are compiled by the Environmental Protection Agency (EPA) and submitted to the European Commission.

**There are no other changes required to this section. Refer to the Bathing Waters Heading in Section 11.2 of Appendix 11.1 in the 2024 EIAR.**

### Shellfish waters directive

11.2.4 There are no changes to this section. Refer to the Shellfish waters directive Heading under Section 11.2 of Appendix 11.1 in the 2024 EIAR.

### Priority substances

11.2.5 There are no changes to this section. Refer to the Priority substances Heading under Section 11.2 of Appendix 11.1 in the 2024 EIAR.

### Nutrient sensitive waters

**The key change required to this section is to ensure the appropriate inclusion of legislative amendments relating to nutrient sensitive areas. This does not materially affect the assessment and relates only to demonstrating consideration of the relevant legislative context. The following outlines where text should be added to this section of Appendix 11.1 in the 2024 EIAR.**

**The following paragraph should be inserted following paragraphs 11.2.14 and 11.2.15 of Appendix 11.1 of the 2024 EIAR:**

11.2.6 Of note, the 'recast Urban Waste Water Treatment Directive (UWWTD)', formally called Directive (EU) 2024/3019, adopted in November 2024 and which entered into force on 1 January 2025, replaces the 1991 UWWTD (91/271/EEC). Ireland, like all member states, must transpose Directive 2024/3019 into national law by 31 July 2027. The Department of Housing, Local Government and Heritage, in collaboration with the EPA and Uisce Éireann, will be responsible for overseeing this process. Until then, the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) remain the applicable legislation in Ireland.

**The following paragraph should be inserted following paragraphs 11.2.16 and 11.2.17 of Appendix 11.1 of the 2024 EIAR:**

11.2.7 Ireland applies a Whole Territory Approach under the Nitrates Directive, meaning the entire country is designated as a nitrate vulnerable zone (NVZ). Mandatory rules are enforced through the European Union (Good Agricultural Practice for Protection of Waters) Regulations to reduce nitrate losses from agricultural land. These measures support the achievement of WFD objectives by protecting water bodies from nutrient pollution and contributing to the attainment of good ecological and chemical status.

**There are no other changes required to this section. Refer to the Nutrient sensitive waters Heading in Section 11.2 of Appendix 11.1 in the 2024 EIAR.**

### Protected areas

11.2.8 There are no changes to this section. Refer to the Protected areas Heading under Section 11.2 of Appendix 11.1 in the 2024 EIAR.

## 11.3 Methodology

### Overview

11.3.1 There are no changes to this section. Refer to the Overview Heading under Section 11.3 of Appendix 11.1 in the 2024 EIAR.

### Guidance

11.3.2 There are no changes to this section. Refer to the Guidance Heading under Section 11.3 of Appendix 11.1 in the 2024 EIAR.

### Data Sources

**The key change required to this section is the inclusion of new site-specific benthic surveys in 2025, which provide validation of earlier site-specific benthic surveys in 2022 used to characterise the baseline. Appendix A11.1 also incorporates additional desk-based reports published by the EPA, following submission of the 2024 EIAR. In addition to the sources referenced under the Data Sources Heading in Section 11.3 of Appendix 11.1 in the 2024 EIAR, the following sources have also been considered in Appendix A11.1**:

- Appendix A12.1: Benthic Ecology Survey Report 2025;
- Bathing Water Quality in Ireland 2024 (EPA, 2025a);
- Water Quality in Ireland: 2016 - 2021 (EPA, 2022);

- Water Quality Monitoring Report on Nitrogen and Phosphorus Concentrations in Irish Waters 2024 (EPA, 2025b);
- Targeting Measures for Water Quality Outcomes: Analysis of the Gap to Achieving Water Framework Directive Environmental Objectives (EPA, 2024a); and
- Nitrate Directives Article 10 Report for Ireland for the Period 2020-2023 (EPA, 2024b).

**There are no other changes required to this section. Refer to the Data Sources Heading in Section 11.3 of Appendix 11.1 in the 2024 EIAR**.

### WFD Receptors

11.3.3 There are no changes to this section. Refer to the WFD Receptors Heading under Section 11.3 of Appendix 11.1 in the 2024 EIAR.

## 11.4 Receiving Environment

11.4.1 There are no changes to this section. Refer to the Receiving Environment Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR.

### Water bodies

11.4.2 There are no changes to this section. Refer to the Waterbodies Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR.

### Bathing Waters

**The changes in this section are required as a result of updated BW classifications. To ensure the assessment remains relevant and up to date, and to reflect recent improvements or deteriorations in BW status, the updated classifications have been considered further within this section. Therefore, the following text under the Bathing Water Heading within Section 11.4 of Appendix 11.1 in the 2024 EIAR shall be deleted:**

11.4.3 *The only relevant BW identified (within 2km of the ECC) was the Balbriggan, Front Strand Beach BW, which has been of 'Poor' status in 2020, 2021, and 2022*.

**And be replaced with**:

11.4.4 The only relevant BW identified (within 2km of the Export Cable Corridor (ECC)) was the Balbriggan, Front Strand Beach BW. Balbriggan, Front Strand was classified as having 'Poor' water quality rating in the years 2021 to 2023. Annual water quality ratings are generally calculated using monitoring results over a four-year period and are assessed against stringent bacterial limits to protect bather health.

11.4.5 In 2024, Balbriggan, Front Strand Beach was assigned a 'Changes' class on the basis of improvement works carried out by Fingal County Council. In 2025, it achieved a 'Sufficient' water quality classification based on assessment of bacteriological results for the period 2024 and 2025 (Beaches.ie, 2025).

**There are no other changes required to this section. Refer to the Bathing Waters Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR.**

## Shellfish Waters

11.4.6 There are no changes to this section. Refer to the Shellfish Waters Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Nutrient Sensitive Areas

**The changes in this section are required as a result of updated Nitrate Directives Article 10 Report for Ireland for the Period 2020-2023 (EPA, 2024b). Therefore, text under the Nutrient Sensitive Areas Heading within Section 11.4 of Appendix 11.1 in the 2024 EIAR shall be deleted:**

11.4.7 *The EPA previously identified various areas where sewage discharges pose a main significant pressure on water bodies (risking pollution). 'At risk of pollution' is defined as being at risk of not achieving the specific environmental target set for the water body, such as 'Good' ecological status. As shown in Figure 11.1.2, there are no designated sensitive areas within 2km of the array area or ECC. Therefore, nutrient sensitive areas will not be considered further in this assessment.*

**And be replaced with:**

11.4.8 The EPA previously identified various areas where sewage discharges pose a main significant pressure on water bodies (risking pollution). 'At risk of pollution' is defined as being at risk of not achieving the specific environmental target set for the water body, such as 'Good' ecological status. As shown in Figure 11.1.2 of Appendix 11.1 in the 2024 EIAR, there are no designated sensitive areas under the UWWTD within 2km of the array area or ECC.

11.4.9 With regard to the Nitrates Directive, Ireland has adopted a whole-territory approach to implementation. This means the entire national territory is designated as a NVZ, with legally binding limits on nitrogen and phosphorus application applying consistently across all agricultural land. The proposed development is not anticipated to generate nutrient emissions or otherwise affect water quality in relation to meeting these requirements.

**There are no other changes required to this section. Refer to the Nutrient Sensitive Areas Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR**.

## Drinking Water Protected Areas

11.4.10 There are no changes to this section. Refer to the Drinking Water Protected Areas Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Natura 2000 Protected Sites

11.4.11 There are no changes to this section. Refer to the Natura 2000 Protected Sites Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Assessment of WFD Receptors

## Project Activities

11.4.12 There are no changes required to this section. Refer to the Project Activities Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Hydromorphology

**The key change to this section is to include the updated morphodynamic modelling output in relation to the pathway of physical changes to the coastline arising from modification of storm waves due to array-scale blockage. While the array area lies outside the 2km buffer area, the receptors relevant to this pathway include the coastline and beaches. This text has therefore been updated to incorporate the modelling conclusions. Accordingly, under the Hydromorphology Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR, the following text should be added. This update does not alter any of the conclusions in the 2024 EIAR:**

11.4.13 Updated morphodynamic modelling (refer to Chapter 10: Marine Geology, Oceanography and Physical Processes, Section 10.5.3.4) has assessed the most conservative design scenario (using Project Option 1), representing the maximum effective blockage from turbine foundations relative to the baseline (no structures).

11.4.14 The modelling demonstrates that any array-scale effects on waves are limited to minor, localised changes within the array, which dissipate offshore and do not persist to the nearshore due to the dominance of shallow water processes, resulting in wave conditions comparable to baseline.

11.4.15 As a result, no measurable changes in wave conditions are predicted at the coastline or beaches within the Northwestern Irish Sea (HA08) coastal water body, including Balbriggan, Front Stand Beach BW.

11.4.16 Consequently, effects on coastal processes and hydromorphology are negligible under both typical and storm conditions.

**Based on the updated modelling output presented in Chapter 10: Marine Geology, Oceanography and Physical Processes, there are no other changes to this section. Refer to the Hydromorphology Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.**

## Benthic Habitats

11.4.17 Based on the outcome of the updated assessment in Chapter 12: Benthic and Intertidal Ecology, there are no changes to this section. Refer to the Benthic Habitats Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development area is considered compliant with the WFD objectives.

## Fish

11.4.18 Based on the outcome of the updated assessment in Chapter 13: Fish and Shellfish Ecology, there are no changes to this section. Refer to the Fish Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development area is considered compliant with the WFD objectives.

11.4.19 Based on the outcome of the updated assessment in Chapter 11: Marine Water and Sediment Quality, there are no changes to this section. Refer to the Water Quality Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development area is considered compliant with the WFD objectives.

## Suspended sediment concentration

**Changes are required to this section to reflect the revision of the foundation types for Project Option 1 and Project Option 2. Further information on the design refinements made in response to the RFI, third-party submissions and the continued public and stakeholder consultation is found within Appendix A5.1 Design Refinements. WTGs are now proposed with suction bucket jacket (SBJ) foundations, and OSPs with jacket foundations and pin piles or SBJ foundations. In addition, sandwave clearance has been removed as a design option. Therefore, Paragraph 11.4.10 (and subsequent bullet points) in Section 11.4 of Appendix 11.1 in the 2024 EIAR shall be deleted:**

11.4.20 *The development activities typically resulting in sediment disturbance and increased SSC have the greatest impact on turbidity. The potential disturbance of subtidal sediment also has the potential to release sediment bound contaminants. Activities which may result in temporarily elevated SSC include:*

- *Seabed preparation (including sandwave clearance) for foundation and cable installation;*
- *Cable trenching (ECC and inter-array);*
- *Foundation installation (drilling);*
- *HDD excavation (ECC);*
- *Dredging (for foundation installation if required); and*
- *Anchoring of vessels associated with proposed development activities.*

**And be replaced with:**

11.4.21 The development activities typically resulting in sediment disturbance and increased SSC have the greatest impact on turbidity. The potential disturbance of subtidal sediment also has the potential to release sediment bound contaminants. Activities which may result in temporarily elevated SSC include:

- Cable trenching (ECC and inter-array);
- OSP four-legged foundation installed via suction or drilled pin pile;
- WTG three- or four-legged jacket foundations installed via lifting, suction installation.
- Horizontal Directional Drilling (HDD) excavation (ECC); and
- Anchoring of vessels associated with proposed development activities.

**In addition, another key change to this section is the inclusion of updated numerical modelling, specifically for HDD exit pit excavation using a Mass Flow Excavator (MFE), which represents the**

**scenario with the greatest magnitude of impact on the identified WFD receptors. Therefore, text under the Suspended sediment concentrations Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR should be deleted:**

11.4.22 *The project-specific modelling has predicted that the sediment plumes resulting from development activities will disperse quickly after the cessation of construction activities, resulting in concentrations returning to background levels. Once suspended, coarser material is typically deposited close to the source of disruption, with dispersion associated with finer material (decreasing exponentially with increased distance from the source). Finer material disturbed is predicted to be dispersed widely and form part of the background SSC in the nearshore area. The increased SSC impacts are considered to be spatially limited, intermittent, temporally restricted (within one tidal excursion) and reversible.*

11.4.23 *Given that sediment plumes are expected to quickly dissipate upon cessation of the disruptive activities, SSC are expected to return to background concentrations naturally*.

**And be replaced with:**

11.4.24 Project-specific modelling has been undertaken to assess the potential for sediment plume generation associated with the excavation of nearshore HDD exit pits. This modelling considered the excavation scenario with the greatest potential magnitude of impact (e.g. MFE) and a range of tidal conditions (spring and neap, flood and ebb).

11.4.25 The results indicate that sediment plumes generated during excavation would be short-lived and largely confined to the vicinity of the exit pits. Elevated SSC are predicted to occur primarily in the immediate area surrounding the excavation, with peak concentrations reducing rapidly with distance from the source. While fine sediments may be transported alongshore for distances of up to approximately 2.2 km under certain tidal conditions, concentrations at these distances are low (typically <10 mg/l) and of short duration (generally less than a few hours).

11.4.26 Coarser material is predicted to settle rapidly adjacent to the exit pits and does not contribute to plume dispersion. Deposition of finer material follows a similar spatial pattern to the plume, with the greatest thicknesses occurring in close proximity to the excavation area and reducing quickly with distance.

11.4.27 The modelling also indicates that the plume pathways do not extend to sensitive receptors such as nearby bathing waters or the coastline at levels that would result in measurable effects. Any increases in SSC are temporary, localised, and reversible, and are consistent with the dynamic nature of the nearshore environment.

11.4.28 Accordingly, this additional modelling does not alter the conclusions of the original assessment or subsequent assessments based on sediment plume modelling. The predicted increases in SSC remain spatially limited, intermittent, and short-term, with conditions expected to return to background levels within a tidal cycle following cessation of works.

**There are no other changes required to this section. Refer to the Suspended sediment concentration Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR**.

### Dissolved oxygen

11.4.29 There are no changes to this section. Refer to the Dissolved oxygen Heading under Section 11.4 of Appendix 11.4 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development area is considered compliant with the WFD objectives.

### Water clarity

11.4.30 There are no changes to this section. Refer to the Water clarity Heading under Section 11.4 of Appendix 11.4 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development area is considered compliant with the WFD objectives.

### Sediment bound contaminants

**The key change required to this section is the inclusion of new site-specific benthic surveys conducted in 2025 which included a full suite of sediment contamination analyses, which provide validation of earlier site-specific benthic surveys conducted in 2022, which were used to characterise the baseline. Therefore, under the Sediment bound contaminants Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR the following text should be added. This update does not alter any of the conclusions in the 2024 EIAR:**

11.4.31 Particle size analysis (PSA) conducted on sediment samples collected across the proposed development in October 2025 has been used to further characterise baseline environmental conditions. The results are consistent with previous PSA undertaken as part of site-specific benthic surveys in September 2022.

11.4.32 In addition, sediment samples collected during the October 2025 survey were analysed for a Marine Institute full suite of contaminants. All sediment contamination samples collected along the array area and ECC were below the applicable Lower and Upper Irish Action Levels (ALs).

11.4.33 Accordingly, the 2025 survey results do not identify any new or elevated contaminant concentrations. The understanding of baseline sediment contamination levels therefore remains unchanged, and the water quality assessment is not materially affected.

**There are no other changes required to this section. Refer to the Sediment bound contaminants Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR.**

### Conclusion

11.4.34 There are no changes to this section. Refer to the Water Quality Conclusions Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Protected Areas

### Designated bathing water(s)

11.4.35 There are no changes to this section. Refer to the Designated bathing waters Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Nutrient vulnerable zones

**The key changes to this section relate to updating the title and text to more clearly explain the circumstances under which these receptors are not considered in this assessment. Accordingly, the heading and associated text under Nutrient Vulnerable Zones shall be deleted:**

### *Nutrient vulnerable zones*

11.4.36 *There are no designated NVZs within the study area, as shown in Figure 11.1.2. This impact pathway is not considered further within this assessment.*

**And be replaced with:**

### Nutrient sensitive areas

11.4.37 There are no nutrient-sensitive areas under the UWWTD within the study area (see Figure 11.1.2 of Appendix 11.1 in the 2024 EIAR). Although Ireland is technically designated as an NVZ under the Nitrates Directive, the proposed development is not expected to generate nutrient emissions or affect water quality in relation to these requirements. While temporary and spatially limited releases of sediment-bound nitrate may occur during disturbance activities (as described in paragraph 11.4.14 of Appendix 11.1 in the 2024 EIAR), these are not anticipated to result in significant effects. Accordingly, taking into account both UWWTD sensitive areas and the national NVZ designation, it is concluded that the proposed development will not have significant effects on nutrient-sensitive areas. These receptors are therefore not considered further in this assessment.

**There are no other changes required to this section. Refer to the updated Nutrient Sensitive Areas Heading in Section 11.4 of Appendix 11.1 in the 2024 EIAR**.

### Natura 2000 protected sites

11.4.38 There are no changes to this section. Refer to the Natura 2000 protected sites Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore there will be no adverse effects on integrity of European sites.

### Shellfish water protected area(s)

11.4.39 There are no changes to this section. Refer to the Shellfish water protected area(s) Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and there is not anticipated to be significant impacts to microbiology of the Balbriggan/Skerries Shellfish Waters as a result of the proposed development.

### Conclusion

11.4.40 There are no changes to this section. Refer to the Paragraph 11.4.26 under Section 11.4 of Appendix 11.1 in the 2024 EIAR.

## Marine Invasive and Non-Native Species

11.4.41 There are no changes to this section. Refer to the Marine Invasive and Non-Native Species Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR. For clarity, the assessment conclusions remains unchanged, and therefore the offshore development is considered compliant with the WFD objectives.

## Conclusions

11.4.42 There are no changes to this section. Refer to the Conclusions Heading under Section 11.4 of Appendix 11.1 on the 2024 EIAR.

11.4.43 For clarity, it was concluded that the proposed development will not result in a deterioration of the current status of waterbodies or jeopardise the attainment of 'Good' status.

## References

**As a result of new information, the following references are added:**


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**There are no other changes to this section. Refer to the References Heading under Section 11.4 of Appendix 11.1 in the 2024 EIAR.**

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