

Addendum to the
Environmental Impact
Assessment Report

NISA
North Irish Sea Array

Volume 9 - Offshore Appendices

Appendix A17.5

Irish Coast Guard Response Letter May 2026



Appendix A17.5: Irish Coast Guard Response Letter May 2026

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 Chapter 17: Shipping and Navigation of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A.1.2 Consultation Report.

For the purposes of clarity, this document shall be read in conjunction with the Chapter 17: Shipping and Navigation submitted as part of the 2024 EIAR.

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

The sections relevant to Chapter 17: Shipping and Navigation in the RFI are included below.

RFI Section	RFI	Relevance to Chapter
2 (a)	The IRCG, through the DoT, has raised concerns in relation to the layout of the proposed development with respect to search-and-rescue (SAR) access. The applicant is requested to consult with the IRCG, in addressing these concerns, and provide further information and clarification on such matters	<p>Continued consultation has occurred with the IRCG since the submission of the 2024 EIAR and the layouts have been revised in liaison with the IRCG in response to RFI Section 2 (a). These layouts include a single line of orientation (SLoO) with a linear configuration which is accompanied by a safety justification (Appendix A17.4: North Irish Sea Array Offshore Wind Farm - Safety Justification for Single Line of Orientation Layout) in line with the requirements of Marine Guidance Note (MGN) 654. IRCG have confirmed within this document that with the linear alignment and consideration of SAR checklist matters that they are content that the safety justification meets the Irish guidance including SOP 07 2025 OREI Guidance and Operational Considerations for SAR and Emergency Response. Further details associated with the refined layouts are included in Appendix A5.1: Design Refinements.</p> <p>Appendix A17.4: North Irish Sea Array Offshore Wind Farm - Safety Justification for Single Line of Orientation Layout, prepared by the Developer demonstrates that in the case of the proposed development, hazards associated with a SLoO layout are as low as reasonably practicable (ALARP).</p>
2 (b)	The EIAR under Chapter 17, Shipping and Navigation, states that as part of embedded mitigation, the fixed layouts for Project Option 1 and Project Option 2 comply with MGN	At the time of the 2024 EIAR, comprehensive Irish guidance was not in place and therefore use of the UK MGN 654 (MCA, 2021) was agreed

RFI Section	RFI	Relevance to Chapter
	<p>654 requirements (Marine Guidance Note (UK) guidance, Maritime and Coastguard Agency (MCA), 2021). The applicant is advised that the DoT MSO states that the proposed layout does not comply with guidance provided in MGN 654 and the MSO strongly disagrees with the summarisation of the risk to the safety of navigation posed to commercial shipping, fishing vessels, and recreational craft transiting in proximity to the southeastern corner and the Rockabill Gap. The applicant is requested to consult with the Department of Transport MSO in addressing these concerns and provide further information and clarification on such matters.</p>	<p>for use by relevant stakeholders. Since then, the guidance has been published by Department of Transport (DoT) and in line with its requirements; the Navigational Risk Assessment (Appendix A17.1: NRA) is still informed by MGN 654. The refined layouts for Project Option 1 and Project Option 2 have a SLoO with a linear configuration which is accompanied by a safety justification (Appendix A17.4: North Irish Sea Array Offshore Wind Farm - Safety Justification for Single Line of Orientation Layout) in line with the requirements of MGN 654. The wind turbine (WTG) layouts for both Project 1 and Project Option 2 have also been set back from the south eastern corner which was central to the MSO's concerns.</p> <p>Continued consultation has occurred with the MSO since the submission of the 2024 EIAR in response to RFI Section 2 (b). The MSO has since confirmed (during a meeting in March 2026 as outlined in Section 4 of the NRA (Appendix A17.1)) their contentment and acceptance of the new proposed layouts noting that the PIANC guidance (PIANC, 2018) was also applied to the Rockabill Gap and resulted in an increased Structure Exclusion Zone to which the MSO have deemed suitable for safe navigation.</p>

An Roinn Iompair
Department of Transport



Mr. Miche6al O'Toole
Director,
Irish Coast Guard,
Department of Transport,
2 Lesson Lane,
Dublin 2

10th May 2026

Anna Jamieson,
NISA Consents Manager,
North Irish Sea Array Windfarm (Statkraft Ireland Ltd),
Building 4200,
Cork Airport Business Park,
T12D23C,
Cork,
Ireland

RE: REQUEST FOR FURTHER INFORMATION PROCESS IN THE APPLICATION TO AN BORD PLEAN6LA, UNDER SECTION 291 OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED) FOR PERMISSION FOR NORTH IRISH SEA ARRAY – ABP CASE NUMBER: ABP-319866-24

North Irish Sea Array

Dear Anna,

The Irish Coast Guard is a division within the Department of Transport and is not a separate legal entity to the Department. The Irish Coast Guard is a prescribed body under S.I. 100/2023 – Planning and Development (Maritime Development) Regulations 2023, however it remains a division of the Department of Transport.

On the 15th August 2024, Irish Coast Guard made a submission (attached) on the above planning application, raising concerns in relation to Search & Rescue (SAR).

By way of letter from An Coimisi6n Plean6la dated 10th April 2025 addressed to the applicant, the applicant was requested to consult with the Irish Coast Guard, to address concerns in relation to the layout of the proposed development with respect to search-and-rescue (SAR) access and provided further information and clarity on such matters. The applicant met with Irish Coast Guard on 24th June 2025 and on 5th February 2025. The applicant must respond with the further information to An Coimisi6n Plean6la by the 14th August 2026.

The following documents/files (attached) were submitted to Irish Coast Guard on the 24th February 2026 for review:

1. A Safety Justification dated 12th February 2026 (Document Reference A5480-NISA-TN-01) Revision Number 02
2. A Response to Submissions & Observations on the Proposed Development from IRCG – Department of Transport

3. Overview of Project Option 1 dated 5th January 2026
4. Project Option 1 Indicative SAR Access dated 21st January 2026
5. Overview of Project Option 2 dated 15th January 2026
6. Project Option 2 Indicative SAR Access dated 22nd January 2026
7. Limit of Deviation & Micrositing Illustration dated 10th February 2026
8. NISA – IRCG Meeting Minutes dated 5th February 2026

The safety justification provides mitigating measures in relation to one line of orientation when searching for a casualty within a wind farm for Layout Option 1 (35 WTGs) & Option 2 (49 WTGs).

With regards to document submitted by the applicant on the 24th February 2025, the Irish Coast Guard has the following observations:


- a. With regards to the potential misalignment of turbines due to micrositing/limit of deviation, the Irish Coast Guard notes individual structures should retain linear alignment along rows of structures as per Figures 3.4 of the Safety Justification document and the Limit of Deviation & Micrositing Illustration dated 10th February 2026
- b. Where technology is available, the applicant should consider the provision of direct data feeds via a suitable mechanism to the Irish Coast Guard for camera coverage, marine coordination systems, meteorological monitoring, marine navigational radar and AIS systems in the array. Such systems will be of operational benefit to the Irish Coast Guard for Search & Rescue, maritime casualties and pollution monitoring.
- c. IC2 Gas Interconnector pipeline – IRCG notes that the applicant has moved the nearest Wind Turbine Generators (WTGs) to the Gas Interconnector pipeline. The distance between the WTGs and the pipeline has increased as a result. IRCG notes that the applicant is actively engaging with Gas Networks Ireland on the matter.

Subject to the implementation of the above observations (a-c), we are content the provisions and mitigations outlined have met the requirements as set out in the National Maritime Oil/HNS Spill Contingency Plan - Standard Operating Procedure 07-2025 Offshore Renewable Energy Installations (OREI): Guidance and Operational Considerations for SAR and Emergency Response and have no further comment at this time.

The applicant will need to submit a detailed Emergency Response Cooperation Plan (ERCoP) to the Irish Coast Guard for review for all phases of the development, subject to granting of planning permission.

We would also ask An Coimisiún Pleanála to consider the three observations (a-c) above and the provisions and mitigations as set out in safety justification are mandated as a condition of any planning decision to grant approval to the development. It is requested that this letter, inclusive of attachments, be forwarded to An Coimisiún Pleanála.

For and on behalf of the Irish Coast Guard

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Micheál O'Toole

Director
Irish Coast Guard
Department of Transport