

# ALCATEL SUBMARINE NETWORK

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## Havhingsten

### Appendix J - Pre-Application Consultation

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## 1.1 Consultation

The Havhingsten project recognise that consultation is an important activity in the planning and pre-application phase for a development. As such consultation with the Foreshore Unit, local planning authorities and other stakeholder groups commenced in 2018. Table 1-1 lists the meetings and discussions held prior to submission of the Foreshore Application.

**Table 1-1 Pre-application consultation**

Stakeholder	Date	Objective
Marine Institute	19/06/2018	Meeting – to introduce the project and identify constraints
Geological Survey of Ireland	19/06/2018	Meeting – to introduce the project and identify constraints
Howth Harbour Master	20/06/2018	Meeting – to introduce the project and identify constraints
Department of Culture, Heritage and the Gaeltacht	20/06/2018	Contact to arrange a meeting with Foreshore Unit to introduce the project while on site visits.
Department of Culture, Heritage and the Gaeltacht	21/06/2018	Discussion with FU on the proposed Donabate Landing Site and existing Survey Foreshore licence. Enquire about potential variation to foreshore licence.
Department of Culture, Heritage and the Gaeltacht	25/06/2018	Confirmation and guidance on archaeological assessment requirements
Underwater Archaeology Unit	25/06/2018	Introduce the project and identify constraints
Department of Culture, Heritage and the Gaeltacht	24/08/2018	Submission of Foreshore Pre-Application Enquiry
	11/09/2018	ASN meeting request / enquiry /introduction to Case Officer – advised no meeting required at this stage.
National Parks and Wildlife Service (NPWS)	06/09/2018	Contacted to introduce the project and identify constraints – advised NPWS will respond to main application
Marine Institute	11/09/2018	Queries on technical information provided for pre-application
Department of Culture, Heritage and the Gaeltacht	12/09/2018	Foreshore Unit confirmed that the project can proceed to Application Stage
Fingal County Council	13/09/2018, 01/11/2018, 20/11/2018	Introduction to scope of project and enquiry for need for planning permission
Irish Fish Producers Organisation	03/02/2019	Contacted to introduce the project
Bird Watch Ireland	14/02/2019	Contacted regarding availability of Loughshinny and surrounding area Bird Count data
Fingal County Council	15/05/2019	Provide intertidal installation information for discussion
Loughshinny Community association	11/06/2019	Contacted to introduce the project and provide contact details
Fingal County council – re Loughshinny Harbour Master	11/06/2019	Contacted to enquire about the Loughshinny Harbour Masters contact details
Mr Faulkner (Fisherman)	11/06/2019	Introduce the project to Loughshinny fishermen and provide point of contact.

Bord Iascaigh Mhara (BIM)	11/06/2019	Introduce the project to Loughshinny fishermen and provide point of contact.
Mr Hickey (Fisherman)	11/06/2019	Introduce the project to Loughshinny fishermen and provide point of contact.
Irish South & East Fish Producers Organisation (ISEFPO)	12/06/2019	Introduce the project to Loughshinny fishermen and provide point of contact.
Mr Flanning (Fisherman)	13/06/2019	Introduce the project to Loughshinny fishermen and provide point of contact.

The meeting minutes and correspondence are included below in order of the above.

## MEETING MINUTES

**DATE:** 19<sup>TH</sup> JUNE 2018

**TIME:** 11:00 HRS

**LOCATION:** MARINE INSTITUTE

**ADDRESS:** WILTON PARK HOUSE, WILTON TERRACE, DUBLIN, D02 NT99

**HOST:** DR TERRY MCMAHON & P J SHAW

ATTENDEES	
Dr Terry McMahon	Marine Institute
Mr P J Shaw	Marine Institute
Mr Alastair Kissane	Aqua Comms
Mr Geoff Holland	ASN
Mr Connor Shipton	ASN
Mr Matthew Hurrell	ASN
Ms Thea Graham	ASN
Ms Paula Daghish	Intertek
Mr John Hunt	Pelagian

Introduced the Site Visit Team to Dr Terry McMahon & Peter Shaw.

Dr McMahon discussed his role as chair to the Marine License Vetting Committee:

<https://www.marine.ie/Home/site-area/areas-activity/marine-environment/marine-environment-licensing-advice>

Applications are assessed by the Marine Institute from an environmental aspect and reported back. It does not act as decision-making authority but advice is provided to the minister.

An overview of the Havingstén Project was presented followed by the Ireland cable route options from Loughshinny and Donabate.

- Loughshinny. The current status of the application was unclear. AquaComms confirmed that the application was on hold/pending whilst further information is considered.
- Donabate. The Marine Institute are unfamiliar with the southern option. They could not confirm whether this would constitute a new application or an amendment to the original application. It was felt that in all probability, due process would have to be followed. An example of the current timeframes was illustrated: August 2016 application submitted; January 2017 Marine Institute submitted their findings; May 2018 License issued. The bureaucracy is extremely time consuming.

Commenting on the Donabate & Loughshinny route options, Dr McMahon stated:

- Avoids Lambay Island SPA
- There are no seasonal restrictions in place
- It is likely that a marine mammal observer & fishery liaison representative will be a requirement
- Rock placement/mattressing over pipeline crossing will require licensing
- Southern option follows existing infrastructure
- Terrestrial geotechnical assessment will be the same for both Donabate options. Locations of marine sampling will obviously change.

Loughshinny: marine park can easily be avoided. From a marine perspective, this is the preferred option. No crossings until further offshore. Application underway.

Donabate: preferred option by AquaComms due to shorter terrestrial route to their PoP and improved latency. However, a full understanding of the timeframe to consider the southern option application or amendment has to be considered.

The key issue therefore is the likely timeframe to process the application for the southern route option. The northern Donabate option has been approved and is awaiting the cable route survey application.

Dr McMahon reiterated that Fingal County Council are custodians of the beaches at Donabate and Loughshinny. He also provided Ms Jeannine Dunne's (Assistant Principal Officer, Marine Planning and Foreshore, Department of Housing, Planning Community and Local Government) contact details at the Foreshore Unit in Wexford.

Newtown Road  
Wexford  
Y35 AP90  
Tel: +353 (0)53 911 7500  
Direct Line: +353 (0)53 911 7342  
Email: [Jeannine.dunne@housing.gov.ie](mailto:Jeannine.dunne@housing.gov.ie)

The meeting concluded at 12:00 hrs.

As a postscript to the meeting, Paula Daghish contacted Jeannine Dunne and it was confirmed that between 5-6 months minimum is the best case scenario to process the southern route option application.

**MEETING MINUTES**

**DATE:** 20<sup>TH</sup> JUNE 2018

**TIME:** 11:00 HRS

**LOCATION:** GEOLOGICAL SURVEY OF IRELAND (GSI)

**ADDRESS:** BEGGARS BUSH, HADDINGTON ROAD, DUBLIN D04 K7X4

**HOST:** MR SEAN CULLEN

ATTENDEES	
Mr Sean Cullen	GSI
Mr Sean Finlay	GSI
Mr Alastair Kissane	Aqua Comms
Mr Geoff Holland	ASN
Mr Connor Shipton	ASN
Mr Matthew Hurrell	ASN
Mr John Hunt	Pelagian

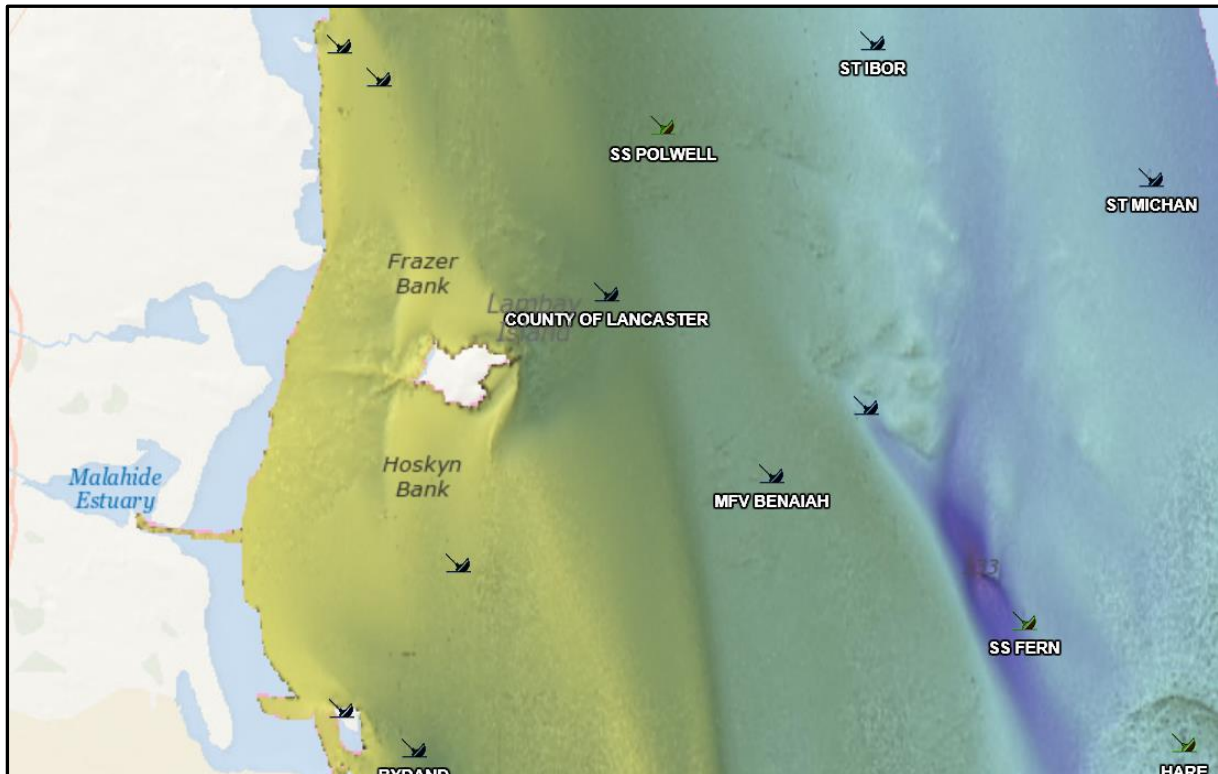
Introduced the Site Visit Team to Mr Sean Cullen.

Connor provided a summary presentation of the Havhingsten project specific to Ireland.

GSI can offer unprocessed CARIS multibeam data if required but data volumes could be considerable.

There are a number of wrecks located around Lambay Island and the Irish wrecks database is available via INFOMAR:

[https://jetstream.gsi.ie/iwdds/delivery/INFOMAR\\_VIEWER/index.html](https://jetstream.gsi.ie/iwdds/delivery/INFOMAR_VIEWER/index.html)



Hydrodynamic data is also available via INFOMAR and Office of Public Works (OPW) has high resolution data also with respect to modelling.

Mr Sean Finlay (Business Development Director) joined the meeting briefly. He mentioned a new sewer outfall serving the Greater Dublin area is proposed to be located at Portmarnock, approximately 5km south of Donabate.

Sean did comment that he would be inclined to route south of Lambay Island.

He also mentioned that the GSI are running a project called 'Cherish' (Climate Heritage & Environments of Reefs, Islands and Headlands) which "will increase cross-border knowledge and understanding of the impacts (past, present and near-future) of climate change, storminess and extreme weather events on the cultural heritage of reefs, islands and headlands of the Irish Sea.

<http://www.irelandwales.eu/projects/cherish>

A survey vessel could be tasked to survey the waters west of Lambay.

Sparker data is also available for the area around Ireland's Eye, approximately 8km south of Donabate.

It was suggested that we may investigate looking at the area north of Skerries but again there are strong currents. It was pointed out that AquaComms needed to be close to Dublin.

Howth Harbourmaster may be able to provide information and he provided us with the HM's contact details:

Harry McLoughlin - Tel: +353 87 234 8387

The sand banks south of Lambay are believed to be stable and not migrating.

The Marine Foreshore Act is impeding offshore windfarm development but should be approved by November 2018 and once passed should speed up the application process.

Marine Spatial Planning (MSP) will be key to future offshore development.

The GSI has plans to map the intertidal area by drones.

GIS data could be made available by Dropbox or providing a removable HDD.

The meeting concluded at 12:00 hrs.



**MEETING MINUTES**

**DATE:** 20<sup>TH</sup> JUNE 2018

**TIME:** 15:45 HRS

**LOCATION:** HOWTH FISHERY HARBOUR CENTRE (Dept of Agriculture, Food & Marine DAFM)

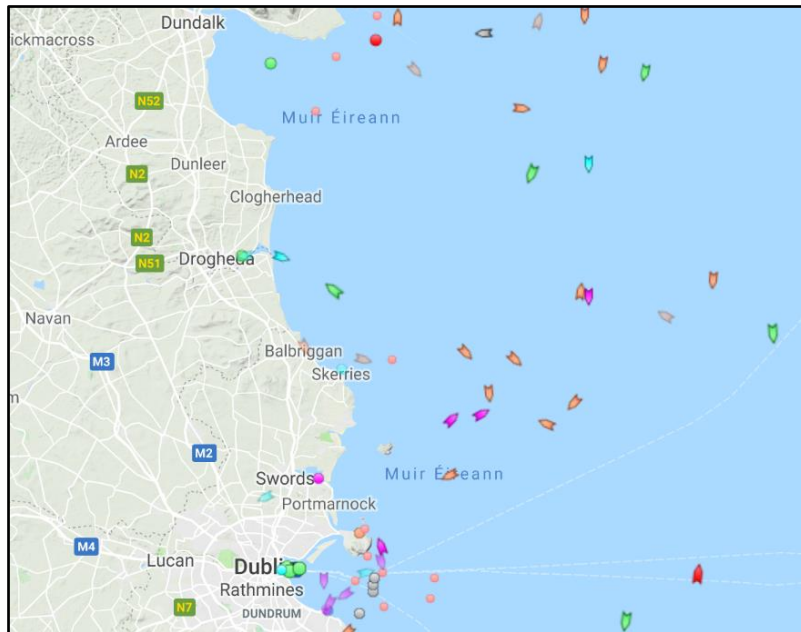
**ADDRESS:** HOWTH FISHERY HARBOUR CENTRE, HOWTH, CO. DUBLIN, DUBLIN D13 VOF6

**HOST:** MR HAROLD MCLOUGHLIN

ATTENDEES	
Mr Harold McLoughlin	DAFM
Mr Geoff Holland	ASN
Mr Connor Shipton	ASN
Mr Matthew Hurrell	ASN
Mr John Hunt	Pelagian

Introduced the Site Visit Team and a brief overview of the project specific to the Irish Sea to Mr ‘Harry’ McLoughlin.

The main fishing activity is for prawns using dragnets maintained with otter boards and middle weights. The peak months are June, July & August. Quiet times for prawn fishing is April & May. He demonstrated their position activity using live AIS data (east of Lambay Island and towards Dundalk Bay).



Interestingly, at spring tides the vessels will be alongside as the prawns dig themselves deep into the seabed. However, at neap tides the vessels may operate continuously for up to 10 days at a time.

Beam trawlers fish for Ray, Black Sole and Monkfish.

Scallopers operate off the south coast of the Isle of Man between July & August.

Razor clam fishing vessels are mainly tied up alongside at the moment due to quota restrictions. They operate all year round very close inshore (1 -2 m water depth). This market is mainly for Spain.

He suggested that the seabed is likely to be soft.

Recommended operational period for survey and installation would be the latter part of the year and definitely avoiding the summer months. September/October would have little impact on their fisheries.

Potters (Crab & Lobster) operate between Lambay Island and the mainland and in shallow water generally. These may not be surface marked or lit. A 2kt current can flow on a spring tide, 0.5-1.0 kt on a neap tide.

We thanked Harry for the wealth of information he kindly provided.

The meeting concluded at 16:15 hrs.

**From:** Liz M OBrien <LizM.OBrien@housing.gov.ie>  
**Sent:** 20 June 2018 14:45  
**To:** Paula Daghish Intertek <paula.daghish@intertek.com>  
**Subject:** foreshore licence application consultation

Hi Paula,

The earliest date that the Water Adviser can meet for a consultation would be Monday the 25<sup>th</sup>. Please let me know if this date suits you.

Regards

*Liz O'Brien*

Marine, Planning & Foreshore,  
Department of Housing, Planning,  
& Local Government

**From:** Paula Daghish Intertek [<mailto:paula.daghish@intertek.com>]  
**Sent:** 24 August 2018 12:24  
**To:** foreshore  
**Cc:** Patricia Adams Intertek  
**Subject:** Havhingsten Telecommunication Cable - Loughshinny Cable Route Pre-application enquiry

Good afternoon

Please find attached a pre-application form for the Havhingsten installation foreshore licence. The attached documents include the following:

- Pre-application form
- Supporting information document
  - Project Overview
  - Location Plan
  - Installation Methodology
  - Coordinates of the survey area in Irish National Grid (near shore) and WGS84 Degrees minutes seconds (offshore).

The pre-application is linked to the Aquacomms Survey Foreshore Licence Ref: FS006746.

We would like to arrange a meeting to discuss the project and application requirements as soon as possible. Please could you contact me with the next available date for a face to face or telcon meeting.

Kindest regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** foreshore <foreshore@housing.gov.ie>  
**Sent:** 28 August 2018 15:46  
**To:** Paula Daghish Intertek <paula.daghish@intertek.com>  
**Subject:** RE: Havhingsten Telecommunication Cable - Loughshinny Cable Route Pre-application enquiry

Good afternoon Paula,

Thank you for your pre-application form in connection with Loughshinny Cable Route. I have sent your pre-application form to the Department's Water Services Adviser and when I hear back from him, I will revert to you.

Regards,

*Liz O'Brien*

Marine Environment & Foreshore,

**From:** Liz M OBrien <LizM.OBrien@housing.gov.ie>  
**Sent:** 12 September 2018 10:20  
**To:** Paula Daghish Intertek <paula.daghish@intertek.com>  
**Cc:** David Carolan <David.Carolan@housing.gov.ie>  
**Subject:** Havingsten Telecommunications Cable Loughshinny

Hi Paula,

I am pleased to inform you that your proposal can proceed to Application Stage. Please see attached the General Guidance to Maps and Drawings and an application form that you need to complete and return to me.

Regards

*Liz O'Brien*

Marine Environment & Foreshore,  
Department of Housing, Planning,  
& Local Government  
Newtown Road,  
Wexford

**From:** Paula Daghish Intertek [<mailto:paula.daghish@intertek.com>]  
**Sent:** 06 September 2018 17:18  
**To:** David Lyons  
**Cc:** Patricia Adams Intertek  
**Subject:** Havhingsten Telecommunication Cable

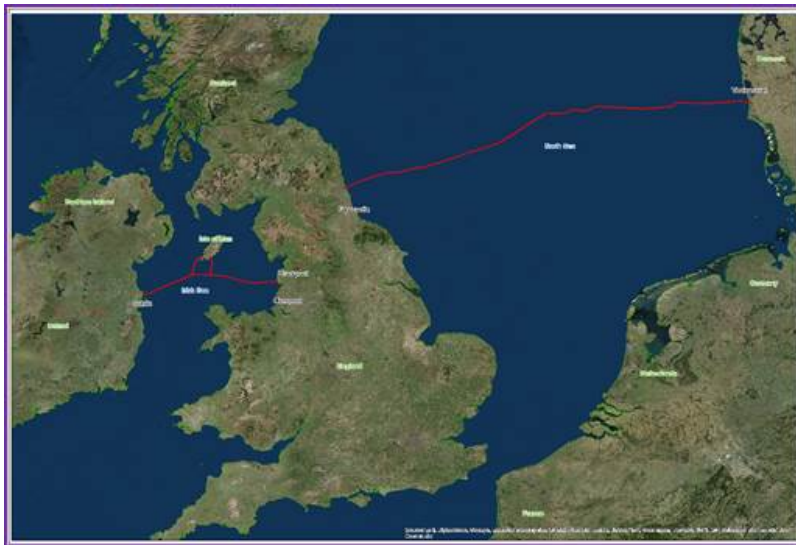
Good afternoon Mr Lyons

I am contacting you on behalf of Alcatel Submarine Networks (ASN) in regard to the proposed Havhingsten telecommunication cable.

Intertek Energy & Water Consultancy Services (Intertek) has been appointed by ASN to provide permitting services for installation of the proposed telecommunication cable and we are writing to you, on behalf of ASN, to introduce the project.

**Project overview:**

The marine elements of the Havhingsten telecom cable are proposed to cross the Irish Sea from Loughshinny, North of Dublin in Ireland to Squire's Gate, South of Blackpool on the West coast of the UK. Two connections to the Isle of Man have also been proposed landing at Port Erin and Port Grenaugh. An overview of the proposed route is included below.



**Route:**

The Loughshinny route within Irish territorial and economic waters is approximately 30km and 55km respectively. The route passes through the Rockabill to Dalkey Island SAC for approximately 7km, and the survey corridor partially overlaps a small section (0.6km length) of the Rockabill SPA (See attached information). The finalisation of the route will follow consultation with stakeholders and the results of detailed marine surveys. ASN intend to submit an application for an installation licence to the Foreshore Unit as soon as possible after surveys are completed.

**Landfall:**

The cable segment from the beach manhole (BMH) on land out to the Low Water Mark (LWM) is proposed to be installed within articulated pipe which has a maximum external diameter of 130mm. This will be buried on the beach to a target depth of 2m below the ground surface or until bedrock. The

beach excavation will typically be carried out using small tracked diggers. The beach profile will be restored following installation of the cable.

**Installation:**

The overall diameter of the proposed submarine optical fibre cable is about 40mm. From the LWM seaward, the cable will be buried to a target depth of 1.5m below the seabed. The cable will be buried using various industry standard burial tools including jetting and /or installation plough. The cable lay is proposed to be performed with a dynamic positioned vessel or a cable lay vessel that maintains station with anchors

**Next steps:**

Fugro on behalf of ASN will be conducting marine survey works from the end of September 2018 starting at the nearshore (under permissions granted in Foreshore Licence Ref: FS006746). The surveys will include geophysical, geotechnical and environmental marine survey of the cable route corridor.

The proposed cable system is provisionally scheduled to be landed and installed starting in the second quarter of 2019 and is expected to be complete by the end of the fourth quarter of 2019.

We would like to discuss the project proposals with you and identify if you foresee any constraints or permitting requirements. We understand that an Appropriate Assessment Screening (including Marine Mammal Risk Assessment) is required for installation works through the Rockabill to Dalkey Island SAC and Rockabill SPA to support the foreshore licence application.

I look forward to hearing from you and discussing the project.

Kindest Regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** David Lyons <[David.Lyons@chg.gov.ie](mailto:David.Lyons@chg.gov.ie)>

**Sent:** 13 September 2018 12:20

**To:** Paula Daghish Intertek <[paula.daghish@intertek.com](mailto:paula.daghish@intertek.com)>

**Subject:** RE: Havhingsten Telecommunication Cable

Dear Paula

Thank you for forwarding the information. From what I understand you have already secured permission to undertake surveys in 2018. I would suggest that the detail you will need to make a formal application for cable lay would be dependent on the outcome of those surveys. Perhaps could you come back to me when you've a better indication of the cable route? Your outline of a requirement for Habitats Directive Assessment (or Natura Impact Statement as it's called here) is correct and this will need to incorporate an evaluation of potential impacts to harbour porpoise and reef specifically. It would also be beneficial to have a wider examination of marine mammals to ensure the wider protection was included. This could be a separate document, or it could be included within the NIS.

Best regards

David

**Dr David Lyons**

**An Roinn Cultúir, Oidhreachta agus Gaeltachta**

Department of Culture, Heritage and the Gaeltacht

**From:** Paula Daghish Intertek  
**Sent:** 13 September 2018 16:08  
**To:** Colm.mccoy@fingal.ie  
**Cc:** Patricia Adams Intertek <patricia.adams@intertek.com>  
**Subject:** Havhingsten Telecommunication Cable

Good afternoon Mr McCory

Introduction to the project s detailed in above correspondence on 6<sup>th</sup> September to NPWS.

**Paula Daghish**

**Intertek Energy & Water**

**From:** Paula Daghish Intertek  
**Sent:** 01 November 2018 17:17  
**To:** Colm.mccoy@fingal.ie  
**Cc:** Patricia Adams Intertek <patricia.adams@intertek.com>  
**Subject:** FW: Havhingsten Telecommunication Cable

Good afternoon Mr McCory

I am contacting you in relation to our correspondence in September and June of this year regarding the Havhingsten telecommunication cable and proposed landing location at Loughshinny.

Please could you confirm that you have received information as below and if you have any comments you would like to discuss related to the marine elements of the project. ASN / Aquacomms will be contacting you directly to discuss the terrestrial route and permits required.

Kind regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** Phillippa Joyce <[Phillippa.Joyce@fingal.ie](mailto:Phillippa.Joyce@fingal.ie)>  
**Sent:** 20 November 2018 11:34  
**To:** Paula Daghish Intertek <[paula.daghish@intertek.com](mailto:paula.daghish@intertek.com)>  
**Subject:** FW: Havhingsten Telecommunication Cable

Hello Paula

My colleague Colm McCoy has forwarded your email to me.

I have responsibility for planning authorisations/ consents within the Balbriggan Electoral Area within which Loughshinny is located.

Can you specify what planning input you require direction on?

Regards

Phillippa

**Phillippa Joyce** BA (Hons), MRUP, MSc Urban Design, Dip SEA & EIA Mgt, MIPI

A/ Senior Executive Planner | Planning and Strategic Infrastructure Department | Fingal County Council |  
Main Street | Swords

**From:** Paula Daghish Intertek [<mailto:paula.daghish@intertek.com>]  
**Sent:** 20 November 2018 12:08  
**To:** Phillippa Joyce  
**Cc:** Patricia Adams Intertek  
**Subject:** RE: Havhingsten Telecommunication Cable

Hi Phillipa

Many thanks for getting in contact.

ASN have commissioned Intertek to provide the marine permits for the project up to MHWS. As I understand it the terrestrial planning authority in Ireland does not have any jurisdiction over the intertidal area? However, I wanted to make you aware of the project. ASN and Aqua Comms will be contacting you shortly to provide information on the terrestrial proposals and requirements for the installation.

With regards to the proposed Loughshinny landing site, it was identified from the landfall visit that there are coastal defence structures (rock dump) within the cove to support cliff areas and it is also a bathing water with a lifeguard during the peak summer months. Please can you indicate if there are considerations for the consenting and if any of this fall within the foreshore licencing considerations.

Kindest regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** Phillippa Joyce <[Phillippa.Joyce@fingal.ie](mailto:Phillippa.Joyce@fingal.ie)>  
**Sent:** 20 November 2018 12:21  
**To:** Paula Daghish Intertek <[paula.daghish@intertek.com](mailto:paula.daghish@intertek.com)>  
**Subject:** RE: Havhingsten Telecommunication Cable

Hello Paula

As the project proposers, you need to have your own position on whether the works you are proposing needing planning permission?

You may need to retain planning consultants if your environmental/ engineering consultants cannot advise you.

There is a Section 5 process where you can ask the Planning Authority for a written position on same.

But for this you need a clear description of development and the details of the Section 5 process can be found on the Fingal website.

Regards

Phillippa

**Phillippa Joyce** BA (Hons), MRUP, MSc Urban Design, Dip SEA & EIA Mgt, MIPI

A/ Senior Executive Planner | Planning and Strategic Infrastructure Department | Fingal County Council |  
Main Street | Swords



**From:** Paula Daghish Intertek  
**Sent:** 13 May 2019 17:19  
**To:** Deirdre.Fallon@fingal.ie  
**Cc:** Patricia Adams Intertek <patricia.adams@intertek.com>; Alistair Kissane | Aqua Comms <akissane@aquacomms.com>  
**Subject:** FW: Havhingsten Telecommunication Cable

Deirdre

Thank you for getting in contact.

I believe my colleague Alistair Kissane at Aquacomms may have also contacted Fingal Council regarding the project (in relation to installation of the terrestrial section of the cable)?

Intertek will be submitting a Foreshore licence application for the installation works, however our client (ASN) have also requested information related to the permits required for the installation of the BMH and seaward ducts for the telecommunication cable – see attached description of the works.

Please could you confirm what submissions would be required for the cable installation.

Kindest regards

**Paula Daghish**

Intertek Energy & Water

**From:** Paula Daghish Intertek  
**Sent:** 11 June 2019 13:22  
**To:** [eharrington@fingalleaderpartnership.ie](mailto:eharrington@fingalleaderpartnership.ie)  
**Cc:** Patricia Adams Intertek <[patricia.adams@intertek.com](mailto:patricia.adams@intertek.com)>; Charlie Cameron Intertek <[charlie.cameron@intertek.com](mailto:charlie.cameron@intertek.com)>  
**Subject:** Proposed Havhingsten Telecommunication Cable

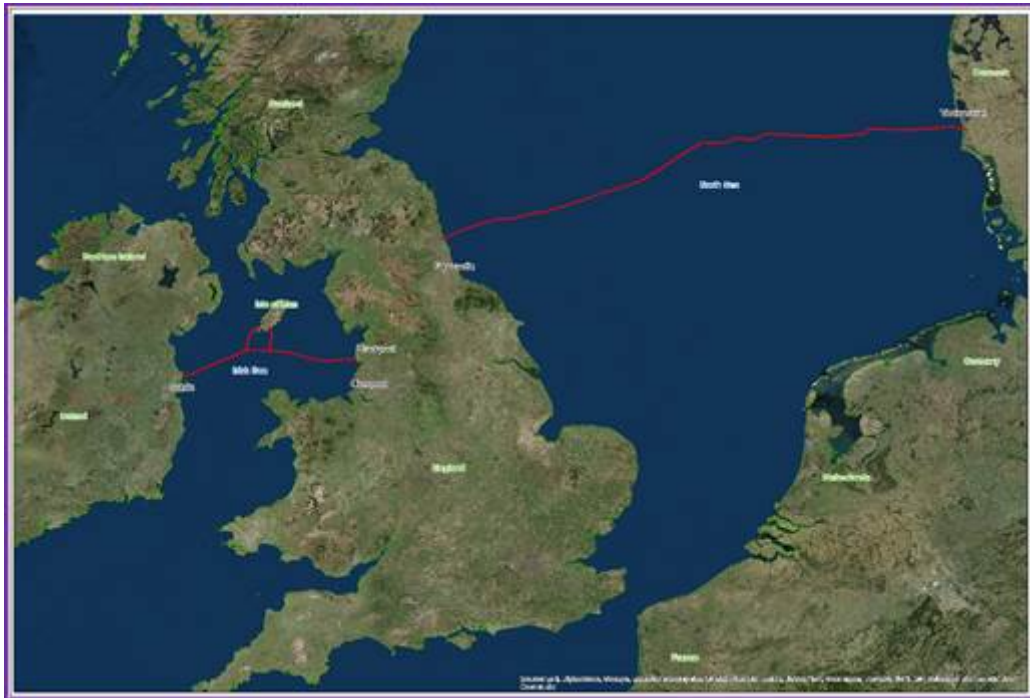
Good afternoon

I am contacting you on behalf of Alcatel Submarine Networks (ASN) in regard to the proposed Havhingsten telecommunication cable.

Intertek Energy & Water Consultancy Services (Intertek) has been appointed by ASN to provide permitting services for the marine elements of the installation of the proposed telecommunication cable. We would like to provide your association some information on the proposed installation.

**Project overview:**

The marine elements of the Havhingsten telecom cable are proposed to cross the Irish Sea from Loughshinny, North of Dublin in Ireland to Squire's Gate, South of Blackpool on the West coast of the UK. Two connections to the Isle of Man have also been proposed landing at Port Erin and Port Grenaugh. An overview of the proposed route is included below. A drawing of the proposed marine route within Irish waters is attached. Aquacomms will be the landing party in relation to this project and will be overseeing the terrestrial consenting process.



**Marine survey:**

Marine survey works for the project were conducted from October 2018 (under permissions granted in Foreshore Licence Ref: FS006746). The surveys were undertaken by Fugro and did not include seismic survey. They included geophysical, geotechnical and environmental marine survey of the cable route corridor.

**Route:**

The Loughshinny route within Irish territorial and economic waters is approximately 30km and 55km respectively. The route passes through the Rockabill to Dalkey Island SAC for approximately 7km, and the survey corridor partially overlaps a small section (0.6km length) of the Rockabill SPA (See P2228-PROT-003-A.pdf attached).

To inform the environmental assessments for the Foreshore licence application we have undertaken Appropriate Assessment Screening and a Natura Impact Assessment for cable installation activities that may cause an effect to protected marine habitats or species.

The finalisation of the route follows analysis of the results of detailed marine surveys and environmental assessment. ASN intend to submit an application for an installation licence to the Foreshore Unit in July 2019.

**Offshore Installation:**

The overall diameter of the proposed submarine optical fibre cable is about 40mm. From the Mean low water mark (MLWM) seaward, the cable will be buried to a target depth of 2m below the seabed. The cable will be buried using various industry standard burial tools including installation plough or jetting tool. The cable lay is proposed to be performed with a dynamic positioned vessel or a cable lay vessel that maintains station with anchors.

**Landfall:**

The beach manhole (BMH) is where the interface, beach joint, between the marine cable and the terrestrial cable will be permanently housed. It will be constructed on within the carpark area at Loughshinny and will consist of an underground chamber approximately 3.4 x 2.4 m (8.2 m<sup>2</sup>) and will be constructed level with the current road surface. The BMH roof will be reinforced strength to

support the weight of vehicles that may be required to use the space above the BMH. It is expected that casting the BMH will take approximately 1-2 weeks on each site. At Loughshinny a seaward duct will pass under the carpark to a point at the back of the beach, just in-front of the rocks edging the back of the beach. Construction of the Beach Manhole (BMH) and seaward duct is planned to be undertaken in advance of the cable landing as part of the terrestrial works.



The marine cable will be floated ashore from the cable lay vessel (positioned at approximately 15m water depth) using flotation buoys and passed through the seaward duct to the BMH. The buoys are then removed from the cable and the cable will fall to the seabed and be buried in to the beach using an excavator to a depth of 2m. Articulated pipe will be used to protect the cable in the upper 300m of the beach to the seaward duct. Articulated pipe has a maximum external diameter of 130mm and will be buried in the beach also to 2m. Following installation, excavated material will be backfilled, and the beach profile restored. The cable landing operations are expected to take up to 3 days.



For public safety, the installation area will be temporarily fenced during the works and therefore will reduce the availability of the beach to public access for a short time. However, ASN will endeavour to undertake these works outside of the main holiday period.

If you would like any further information on the marine elements of the installation, the application will be available on public display (at a location yet to be confirmed). I would be very happy to keep you informed of the application submission.

If in the meantime you would like any further information, please do give me a call.

Kindest Regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** Paula Daghish Intertek

**Sent:** 11 June 2019 13:59

**To:** [customercareunit@fingal.ie](mailto:customercareunit@fingal.ie)

**Subject:** Loughshinny harbormaster

**Importance:** High

Good afternoon

Please could you provide the details (telephone / email address) for the Loughshinny harbour master?

I would like to contact them to discuss anchorages within the cove.

Many thanks

**Paula Daghish**

**Intertek Energy & Water**

**From:** Paula Daghish Intertek  
**Sent:** 11 June 2019 16:44  
**To:** john.hickey@bim.ie  
**Cc:** Patricia Adams Intertek <patricia.adams@intertek.com>; Charlie Cameron Intertek <charlie.cameron@intertek.com>  
**Subject:** FW: FAO:

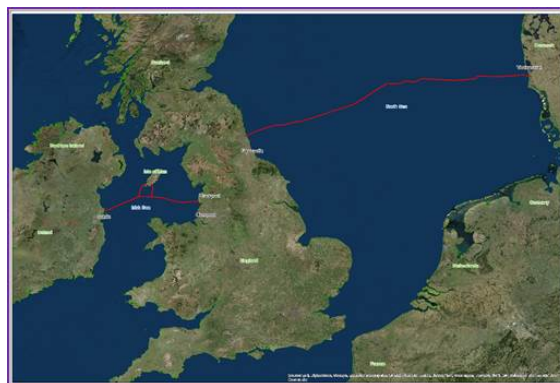
Good afternoon John

I am contacting you on behalf of Alcatel Submarine Networks (ASN) in regard to the proposed Havhingsten telecommunication cable.

Intertek Energy & Water Consultancy Services (Intertek) has been appointed by ASN to provide permitting services for the marine elements of the installation of the proposed telecommunication cable. We would like to provide your association and members some information on the proposed installation.

**Project overview:**

The marine elements of the Havhingsten telecom cable are proposed to cross the Irish Sea from Loughshinny, North of Dublin in Ireland to Squire's Gate, South of Blackpool on the West coast of the UK. Two connections to the Isle of Man have also been proposed landing at Port Erin and Port Grenaugh. An overview of the proposed route is included below. A drawing of the proposed marine route within Irish waters is attached. Aquacomms will be the landing party in relation to this project and will be overseeing the terrestrial consenting process.



**Marine survey:**

Marine survey works for the project were conducted from October 2018 (under permissions granted in Foreshore Licence Ref: FS006746). The surveys were undertaken by Fugro and were supported by a fisheries liaison officer. Survey included geophysical, geotechnical and environmental marine survey of the cable route corridor.

**Route:**

The route within Irish territorial and economic waters is approximately 30km and 55km respectively. The route passes through the Rockabill to Dalkey Island SAC for approximately 7km, and the survey corridor partially overlaps a small section (0.6km length) of the Rockabill SPA (See P2228-PROT-003-A.pdf attached).



To inform the environmental assessments for the Foreshore licence application we have undertaken Appropriate Assessment Screening and a Natura Impact Assessment for cable installation activities that may cause an effect to protected marine habitats or species.

The finalisation of the route follows analysis of the results of detailed marine surveys and environmental assessment. ASN intend to submit an application for an installation licence to the Foreshore Unit in July 2019.

#### **Offshore Installation:**

The overall diameter of the proposed submarine optical fibre cable is about 40mm. From the Mean low water mark (MLWM) seaward, the cable will be buried to a target depth of 2m below the seabed. The cable will be buried using various industry standard burial tools including installation plough or jetting tool. The cable lay is proposed to be performed with a dynamic positioned vessel or a cable lay vessel that maintains station with anchors.

The proposed cable installation route is in close proximity to the Loughshinny port area (see image below Key: Green- proposed cable route; red – cable route search area; pink – Loughshinny harbour area).



#### **Landfall:**

The landing site is adjacent to the Loughshinny harbour area as indicated in the image above. The beach manhole (BMH) is where the interface, beach joint, between the marine cable and the terrestrial cable will be permanently housed. It will be constructed on within the carpark area at Loughshinny and will consist of an underground chamber approximately 3.4 x 2.4 m (8.2 m<sup>2</sup>) and will be constructed level with the current road surface. The BMH roof will be reinforced strength to support the weight of vehicles that may be required to use the space above the BMH. It is expected that casting the BMH will take approximately 1-2 weeks on each site. At Loughshinny a seaward duct will pass under the carpark to a point at the back of the beach, just in-front of the rocks edging the back of the beach. Construction of the Beach Manhole (BMH) and seaward duct is planned to be

undertaken in advance of the cable landing as part of the terrestrial works.



The marine cable will be floated ashore from the cable lay vessel (positioned at approximately 15m water depth) using flotation buoys and passed through the seaward duct to the BMH. The buoys are then removed from the cable and the cable will fall to the seabed and be buried in to the beach using an excavator to a depth of 2m. Articulated pipe will be used to protect the cable in the upper 300m of the beach to the seaward duct. Articulated pipe has a maximum external diameter of 130mm and will be buried in the beach also to 2m. Following installation, excavated material will be backfilled, and the beach profile restored. The cable landing operations are expected to take up to 3 days.



For public safety, the installation area will be temporarily fenced during the works and therefore will reduce the availability of the beach to public access for a short time. However, ASN will endeavour to undertake these works outside of the main holiday period.

If you would like any further information on the marine elements of the installation, the application will be available on public display (at a location yet to be confirmed). I would be very happy to keep you informed of the application submission.

The project will continue to use a fisheries liaison officer throughout the installation phase. If in the meantime you would like any further information, please do give me a call.

Kindest Regards

**Paula Daghish**

**Intertek Energy & Water**

**From:** isefpo <isefpo@eircom.net>  
**Sent:** 12 June 2019 12:12  
**To:** Paula Daghish Intertek <paula.daghish@intertek.com>  
**Cc:** isefpo <isefpo@gmail.com>  
**Subject:** Re: FAO: Hugo Boyle and members

Good afternoon Paula,

I have forwarded your mail to our members this morning and some have come back enquiring when this operation will be starting as they would have crab & whelk pots in and around this area in the Irish Sea.

We look forward to your reply, also could you add isefpo@gmail email address to your mailing list as we are having intermittent problems with our eircom email address and this may cause delays in us receiving your information.

Many thanks.

Regards, Maura.

Irish South & East Fish Producer's Organisation,  
Ground Floor,  
Viewmount House,  
Viewmount Park,  
Dunmore Road,  
Waterford, X91 NCK4.

**From:** Peter <peterlynch@live.ie>  
**Sent:** 13 June 2019 11:45  
**To:** Paula Daghish Intertek <paula.daghish@intertek.com>  
**Subject:** Re: Havhingsten Telecommunication Cable - Marine Installation proposals

Hi Paula

I got that info already from my po. Couple of questions

For you. If foreshore licence expected 27th of

October. When do you think work will start in that area?

And how long it will take? Also, who is liaison officer

And how close can we work to cable route?

What will happen if we can't work this area and can't go fishing

You can't expect us to just move from fishing grounds

Just like that?

Kind regards,



Peter Lynch  
MFV Atlantic Freedom  
Howth

On 13 Jun 2019, at 16:56, Paula Daghish Intertek <[paula.daghish@intertek.com](mailto:paula.daghish@intertek.com)> wrote:

Hi Peter

Thanks for replying.

We are currently in the process of commissioning a FLO officer for the pre-installation and installation works.

The earliest expected date for receiving a foreshore licence for installation may be 27<sup>th</sup> October, however, it is unlikely that the foreshore unit will deliver the licence by this time (depending on their workloads and current delivery timescales. We (myself and the FLO) will keep you informed of the licence application submission, consultation period and determination outcome.

An estimate of the duration for installation of the marine cable to the landward cable route is estimated to be 2-3 days for pulling the cable ashore followed by up to 7 days backfilling the installation trench in the intertidal area. If there is any change to this, we will let you know.

An exclusion zone of 500m is usually enforced during cable installations and is usually a condition of the foreshore licence for marine safety reasons. The installation spread will be moving at a speed of at least 0.5km/hr so we do not anticipate any fishing areas will be excluded for any significant time period. The exception to this may be the port area at Loughshinny. The exclusion zone around the installation will be confirmed to you by the FLO and notice to mariners prior to works commencing.

I have passed your comments regarding your concerns for restriction of fishing area/ port accessibility to ASN. Once the installation proposals are confirmed we will be able to provide more definite information to you. However, at this stage I wanted to make you aware of the proposals and the extent of the works in proximity to the harbour area at Loughshinny.

Kindest regards

**Paula Daghish**

Intertek Energy & Water

**From:** Peter <[peterlynch@live.ie](mailto:peterlynch@live.ie)>

**Sent:** 13 June 2019 18:54

**To:** Paula Daghish Intertek <[paula.daghish@intertek.com](mailto:paula.daghish@intertek.com)>

**Subject:** Re: Havhingsten Telecommunication Cable - Marine Installation proposals

Hi Paula

I'm based in howth but fish that ground a lot. From about a mile offshore and further out so that would be the area I'm worried about.

Kind regards,

Peter Lynch

MFV Atlantic Freedom

**From:** Paula Daghish Intertek

**Sent:** 13 June 2019 19:19

**To:** Peter <peterlynch@live.ie>

**Subject:** RE: Havhingsten Telecommunication Cable - Marine Installation proposals

Peter – noted – I will pass this on to the FLO.

**Paula Daghish**

[Intertek Energy & Water](#)

**From:** Alan Fanning <alanfanningd6@gmail.com>

**Sent:** 13 June 2019 18:52

**To:** Paula Daghish Intertek <paula.daghish@intertek.com>

**Subject:** Re: Havhingsten Telecommunication Cable - Marine Installation proposals

Hi Paula.

I got your email through the p.o I'm a member of. I'm from Loughshinny but fish from Howth and I'll be working around the area a lot.

Keep in touch.

Regards Alan Fanning

## 1.2 Summary of issues raised during the 1st public consultation period held between 21st August 2019 and 27th September 2019 and responses by applicant

Reference	Comment	Response
IRL/01	I have the following submissions/requests for information on the proposal: 1. what consultation was there with Loughshinny Community Association, as mentioned in the Application form? I am a member of that association and do not recall any consultation. Also there is none referred to in appendix J.	Loughshinny Community Association were contacted by email on 11th June 2019 to provide project information for the marine cable route and address some of the concerns that we were aware of from the terrestrial application. We did not receive a response to this email.
IRL/02	2. This work is clearly adjacent to archaeologically sensitive lands of Drumanagh, contrary to application form statement.	It is acknowledged that the corridor passes within 0.1km of the Drumanagh area. During the application process the applicant commissioned fully trained and qualified archaeologists who undertook archaeological studies of the marine cable route. This included a desk based assessment to understand the archaeological potential of the proposed route; a walkover study at the landing site which included a geophysical survey; an offshore geophysical survey and archaeological review of the geophysical survey data. The reports produced were submitted with the Foreshore Licence application as appendix E. These concluded that the planned cable route would not impact any archaeological sites
IRL/03	3. What does the corridor represent?	The 500m wide corridor represents the outer limits of the zone within which the cable will be installed and within which any future maintenance activity will occur. Within this corridor an area up to 10m wide, centred on the cable, will be impacted by equipment used during installation. The cable will be up to 40mm in diameter and will be buried to a depth of 1.5m along the entire route.
IRL/04	4. Is there not a requirement to put up notice in the locality?	The regulator did not request Celtix Connect Ltd to place public notices at the landing site.
IRL/05	5. What future works are precluded in the areas near the cable?	Under the Foreshore Acts 1933 - 201, applicants for a Foreshore Licence are required to publish a notice of their proposals in newspapers circulating in the area. The Notice in question relates to Foreshore Licence No FS 0006915, which considers the marine elements of the Celtix Connect Ltd application up to Mean High Water Springs (MHWS).
IRL/06	6. Any beach disturbed by installation must be restored to original condition.	As the cable will be buried to 1.5m depth it is unlikely that there will be any cable exposures or interaction with fishing activity and no future cable works are anticipated. If a cable fault arises or any future cable maintenance is required this may involve repair or replacement of a short section of faulty cable. The impacts of any cable repairs will be similar but smaller in magnitude and duration. For any potential repair works, notice to mariners will be issued and fishing interests and organisations in the region contacted.
IRL/07	1. this is an absurd location to install a cable, right through the middle of Loughshinny Harbour and right through the middle of the town.	Section 2 (Project description) within the Planning Report states that the beach profile will be restored following installation.
IRL/08	2. The cable, if installed through the harbour, will sterilise any future development of the harbour or even the maintenance of the harbour. Simple things like dredging to maintain useable water depths will be impossible and the use of the harbour for fishing and as an amenity will be totally compromised.	A cable route study was conducted prior to developing the proposed Loughshinny Route. A number of alternative landing locations were reviewed and subsequently discounted including Donnabate and Portrane beaches, as described in the Planning Report. A number of engineering and environmental aspects are considered in identification of an appropriate route. Loughshinny harbour provides a solution to engineering, environmental and archaeological constraints identified at the alternative landing locations. Celtix Connect Ltd knowledge there will be some temporary disruption during the installation phase (for up to 2 weeks at the landing site). Once the cable is installed there will be no visible sign of the cable.
IRL/09	3. The cable will negatively impact and might even cancel the current Irish Water project to clean up the quality of the water being discharged into the bay.	The ducts for the land route from the beach landing site to the station have already been constructed so there will be no further construction on the roads for this cable system.
IRL/10	4. Has Fingal County Council been consulted and have they approved of this development in the harbour and the town. It certainly does not appear in any current County Development Plan nor has any Part 8 planning notification been proposed. Does Fingal County Council agree to the effective sterilisation of the harbour and disruption to the town.	The cable will not pass directly through the harbour area, please see the attached image. The route is not within known dredging maintenance areas and does not cross known shipping lanes or port entrances, so maintenance of the harbour should not be impacted by the presence of the installed cable.
IRL/11	5. What digging up of the roads in and to the town will take place and when are these works planned for.	Any impacts on water quality within the harbour will be temporary and will not affect discharges entering the harbour. Consideration of sediment dispersion was included in the Planning Report and in Appendix J. It is proposed to install the cable during the winter months if possible. The sediment disturbance and potential release of contamination if present within the sediments will settle out within approximately 1-2 days and is likely to be within background levels of turbidity for storm events. As installation within the intertidal area will be undertaken by trenching through the soft sediments at low tide, it is unlikely that significant levels of contaminant (if present) will be within the water column.
IRL/12	6. This Foreshore Application is totally premature as the same company has applied for planning permission for a totally unsuitable cable station on the approach to town. The reference is F19A/0169. Fingal County Council have requested additional information on the 10th June 2019 and to date this company has failed to provide this information. Numerous objections have been lodged against this and it is likely that An Bord Pleanála will rightly refuse this cable station in such a crazy location.	Fingal County Council were introduced to the project and have not provided any adverse comments regarding the application to date. The harbour master was passed our contact details in relation to the project however to date we have not had any response. Fingal County Council will be further consulted as part of the Foreshore Licence process.
IRL/13	7. It should be noted that in addition to the planning application for the cable station at the ESB substation physical works have apparently already been carried out, as this company has dug our roads from the ESB substation to the harbour. This is totally presumptuous and wrong. (handwritten side note: Already dug up the road in relation to this Environmental Impact Statement. No pre application consultation)	Responses to this application are for activities under the Foreshore Licence No FS 0006915 which considers the marine elements of the ASN application up to Mean High Water Springs (MHWS). All works above MHWS are in relation to planning application reference number F19A/0169, please refer to that application for further details.
IRL/14	8. In this regard this Foreshore Licence application is premature and constitutes Project Splitting as the licence application and indeed the planning application do not consider the project in its totality nor it's cumulative impacts. This is planning by stealth.	Please refer to response ref IRL/11.
IRL/15	9. The installation of the cable into Loughshinny harbour will have severe impacts on the environment, marine archaeology, on our cultural heritage, on the fishery industry and on tourism in the town.	Please refer to response ref IRL/11.
IRL/16	10. On the companies foreshore licence application it asks if Loughshinny harbour is abutting any site of Archaeology interest and this company answered NO. Do they not know about the significance of Drumanagh. This company has no local knowledge and no interest in the people of Loughshinny.	The licence application process in Ireland is split for marine and terrestrial installations as required by Irish authorities. The Foreshore Unit are responsible for issuing all marine licences for activities up to Mean High Water Springs (MHWS), and this application will be considered as a marine application only. Celtix Connect Ltd have applied for the Foreshore Licence FS0006915 to install the marine elements of the cable. ESB have applied for the planning application F19A/0169 to install the terrestrial elements of the cable.
IRL/17	11. After scanning through the companies submission for a Foreshore Licence the company makes reference to the Natura 2000 impact assessment and guess what, there is NO such document submitted. This whole application is ill conceived, has major short comings and should not be allowed in the harbour of Loughshinny.	During the application process the applicant commissioned fully trained and qualified archaeologists who undertook archaeological studies of the marine cable route. This included a desk based assessment to understand the archaeological potential of the proposed route; a walkover study at the landing site which included geophysical survey; offshore geophysical survey and archaeological review of the geophysical survey data. The reports produced were submitted with the Foreshore Licence application as appendix E. The cable installation corridor has not identified any archaeological potential. The risk of disturbance to archaeology is low.
IRL/18	In summary this cable will provide no benefit to Loughshinny and its surrounding area and will only generate massive disruption in the short, medium and long term.	Celtix Connect Ltd knowledge there will be some temporary disruption during the installation phase (for up to 2 weeks at the landing site). Once the cable is installed there will be no visible sign of the cable however, with no lasting adverse impacts to Loughshinny. Potential impacts on the environment and shipping and navigation have been evaluated. As detailed in the Planning Report, the impacts were assessed as Slight and Not Significant, due to the temporary nature and small footprint of any disruption caused.
IRL/19	I wish to lodge an objection to the proposed cable being installed at Loughshinny by Celtix Connect.	The NIS screening stage one report was submitted with the application. This is found in Planning Report Appendix H. As no significant impact to the Rockabill to Dalkey Island SAC or Rockabill SPA was identified from installation of the cable, a second stage NIS was not considered to be required.
IRL/20	I oppose on the following grounds: The location is absurd, in the harbour and through the village.	Cable installation will cause temporary disturbance for up to 2 - 3 days within the harbour and up to 7 days for post lay burial in the intertidal area on the beach. Following installation the beach profile will be restored. The cable will not cause any disruption to the harbour functioning outside of this timescale.
IRL/21	The cable if installed will sterilise any future development of the harbour.	Please refer to response ref IRL/07.
IRL/22	The cable will negatively impact the current Irish water project to clean the quality of our water and make it safe for our children.	No current harbour expansion plans are known. If the harbour is developed at a later date the proposals would need to be considered within the existing constraints at the time of application.
IRL/23	Has Fingal County Council been consulted? The town has been dug up for the last 12 months since we moved to Loughshinny, and the road has finally just been resurfaced.	Please also refer to response ref IRL/08.
IRL/24	We, the undersigned, refer to the above planning application & wish to make the following submission / objection / observation in relation to the proposed development. We, the undersigned, wish to object to the proposed development based on the points outlined below: • We have concerns regarding the TITLE OF LAND - CONFLICT OF INFORMATION SUPPLIED as detailed below. • We have concerns regarding the PURPOSE OF 'LANDING STATION' (must align Rural objective & vision) as detailed below • We have concerns regarding the ABSENCE OF A SITE NOTICE - as detailed below. • We have concerns regarding the absence of a LANDSCAPING PLAN not being submitted with the planning application. There are many trees/hedgerows located on the site which enhance our community and in our opinion must be kept. Further concerns outlined below • We have concerns regarding the APPLICATION FORM ERRORS: (1) Location (2) Classification as 'utility installation' (3) Extent/Nature of Development (4) Noise impact on residents (5) No provision for water Supply (6) Negative impact on 'fundamental grounds' for granting planning development F17A/0691 as detailed below. • We have concerns regarding the ENVIRONMENTAL IMPACT as detailed below. On the basis of the above, we, the undersigned, trust our concerns/observations/objections will be taken into consideration prior to a decision being reached on this planning application.  (for full comment see "Consolidated Public Submission.pdf" [pages 11-31])	Please refer to response ref IRL/10. Please refer to response ref IRL/11.
IRL/25	We, the undersigned, refer to the above planning application & wish to make the following submission / objection / observation in relation to the proposed development. We, the undersigned, wish to object to the 'GRANTING OF A FORESHORE LICENCE' based on our concerns outlined below: • This application is one part of a project which also includes planning application F19A/0169 along with 'other parts' (either in progress / planned / to be planned), whose purpose is to link the submarine Cable to the TSO fibre network and, therefore, under EU Directives the entirety of the 'project' must be assessed as one. We have concerns regarding the 'METHODOLOGY USED' as detailed below • We have concerns regarding the 'LACK OF SCIENTIFIC EVIDENCE TO BACKUP THE APPLICANTS VARIOUS CLAIMS OF 'no impact/minimal impact/no long term impact' as detailed below. • We have concerns regarding the ENVIRONMENTAL IMPACT detailed below. Regarding Peter Sweetman and others v An Bord Pleanála - 11 April 2013 (see Consolidated Public Submissions.pdf [pages 34-37])	The proposed marine cable installation does not require an environmental impact assessment under European Directive 85/337/EEC (as amended by Directive 97/11/EC). As no significant environmental effects have been identified from the installation of the telecommunication cable, it is not subject to undertaking an EIA which would consider the entire development (marine and terrestrial). The Foreshore Licence application was therefore submitted for the marine elements of the project only.

IRL/26	<p>The applicant has failed to produce any 'scientific evidence' in his application documents to prove the absence of such effects as referred to in items (1) to (4) above.</p>	<p>Regarding item (1), the Planning Report in the Foreshore Licence application FS 0006915 successfully identifies all relevant protected sites within the Zone of Influence of the proposed cable corridor for the marine route, and through thorough assessment of the conservation objectives of potentially affected sites, using data gathered in several surveys for the purpose of this assessment and available online literature; no lasting adverse effects to the integrity of these sites were identified.</p> <p>Regarding item (4), section 5.5 of the Stage 1 Screening for Appropriate Assessment provides comprehensive coverage of all potential in-combination effects that could have potentially, in conjunction with this project, had a likely significant effect to any Natura 2000 sites. Projects were identified using a variety of data sources. Once these projects were identified, to determine whether any Potential Cumulative Effects may occur between the proposed installation and maintenance activities and these projects, a screening exercise was undertaken to determine if there were any common pressure-receptor pathways, any spatial overlap and any temporal overlap between the installation and maintenance activities and the identified projects. One project, SSE Renewables Braymore Point survey, was concluded to have both temporal and spatial overlaps with the proposed cable installation for the presence of vessels disturbing seabirds. However, due to the temporary and transient nature of both activities by slow moving vessels, and distance of the proposed route from the tern breeding colony that was being considered, the PCE was concluded to be Not Significant, and therefore screened out, leaving no possibility of in-combination effects.</p>
IRL/27	<p>Concerns regarding the methodology (see Consolidated Public Submissions.pdf [pages: 37-39])</p>	<p>The omission of the Loughshinny Community Association Consultation was a typo in anticipation of a response being received. To date we have not received a response to the project information sent via email on 11/06/19.</p>
IRL/28	<p><b>Referring to - Appendix A - Environment Assessment Methodology - 1.2.1 Characterisation of the baseline environment:</b></p> <p>- The applicant has completely failed to scientifically establish the 'baseline' as exists today</p>	<p>Extensive marine surveys were undertaken to identify the baseline environment. These included geophysical and environmental surveys, fisheries activity study, archaeological survey and archaeological review of geophysical survey data offshore. The reports associated with these surveys have been submitted with the Foreshore Application as Appendices.</p>
IRL/29	<p>- The applicant has ruled out the effects of 'other cable laying projects' because they are not concurrent with this project which is a false premise to begin with and runs counter to objectives as listed in Background information above</p>	<p>A cumulative effects assessment was conducted and reviewed other projects in the area with spatial and temporal overlap. This is a standard approach to cumulative effect assessment.</p>
IRL/30	<p><b>Referring to 1.1 Project Background (Appendix F):</b></p> <p>- The approach of segmenting different portions of the overall project runs contrary to the Habitats Directive 92/43/EEC (together with the Birds Directive (79/409/EEC).</p>	<p>Please also refer to response ref IRL/26 for cumulative effects.</p> <p>Please refer to response ref IRL/25.</p>
IRL/31	<p>- Clearly segmenting the 'project' into just two segments ('submarine cable route surveying' and 'submarine cable laying' in Irish territorial waters) is to the benefit of the applicant. The above species are also found residing off the Welsh coast but this application excludes that portion of the 'project'.</p>	<p>In section 5.4 of the Stage 1 Screening for Appropriate Assessment, 'harbour porpoise and bottlenose dolphin protected within sites outside of Irish territorial waters (North Anglesey Marine SAC, Llyn Peninsular and Sarnau SAC, West Wales Marine SAC, North Channel SAC and Bristol Channel SAC) were assessed due to the potential for individuals from these sites to venture outside of these areas and into Irish territorial waters, and potentially into the marine cable corridor, due to their highly mobile nature.</p>
IRL/32	<p>Referring to 2.1.3 Stage 2 - Appropriate Assessment:- The report provided by Intertek Energy &amp; Water Consultancy Services (Intertek) does not provide any conclusions based on "...complete, precise and definitive findings and conclusions capable of removing all scientific doubt..."</p> <p>Concerns regarding the 'Planning Process' as it applies to this 'project':</p> <p>- On the 13th June 2019 a letter from the residents was sent to the enforcement section of Fingal Co Council stating that 'civils work had commenced to lay a duct from Loughshinny Harbour to the proposed ESB 'cable landing station' site a distance of approx. 2km. The council were provided with photographic evidence of this work, contractor details and details linking this contract to AQUA COMMS. On the 17th June 2019 Fingal Co Council sent a warning letter to the contractor carrying out this work and to the applicant.</p> <p>Further documentary evidence was provided to Fingal Co Council as this work progressed over the next few weeks until the duct line arrived outside the entrance to the 'proposed cable landing site' in Ballykea. Following 12 weeks of 'silence' from Fingal Co Council a letter, dated 13th September 2019, finally arrived on 17th September and stated "...A recent inspection of lands at Featherhead Lane, Ballykea, Loughshinny, Co Dublin revealed that th works undertaken on the site have been carried out in accordance with the plans submitted under the approved Planning Permission Register Reference F17A/D169. Accordingly there is no further enforcement action open to the Council in relation to this matter. The file is now closed. These same works were pointed out to Mr Kevin Foley of AQUA COMMS, at the site meeting mentioned above and he identified the work as being "...bought and paid for by AQUA COMMS'. When shown a copy of the letter received from Fingal Co Council dated 13th September 2019 he could not explain how Fingal Co Council thought the duct was part of planning application F17A/0691. F17A/0691 involved development carried out by ESB Telecoms Ltd and The Ireland involving the erection of a 20m mobile phone mast on the same site. How Fingal Co Council decided a duct line laid in June, 19 by contractors identified as working for AQUA COMMS and running from the site over 2km to the beach was part of F17A/0691 development which was carried out 12 months earlier for THREE Ireland is anyone's guess.</p> <p>Concerns regarding the 'Environmental Impact' as it applies to this 'project':</p> <p>- Please refer to submissions made to Fingal Co Council regarding the planning reference below and which under EEC Directives concerning habitats can be linked to this 'foreshore licence application'</p> <p>- Planning Reference Number: F19A/0169</p>	<p>The findings of the Natura 2000 Screening Assessment used route corridor specific survey data and most recently available bird and marine mammal count data available at the time of writing to inform its findings. Through using the best available information, conducting a thorough literature review and underwater noise modelling, the assessment did not find any likely significant effects to the protected sites under the Habitats Directive of the Birds Directive. Therefore, it was concluded that a Stage 2 NIS was not required.</p> <p>Please refer to response ref IRL/11.</p>
IRL/34	<p>I wish to make the following representation on the above mentioned application for a Foreshore Licence, which was lodged with the Department on August 21, 2019. I have tried to examine all of the documentation submitted and in summary I would be of the view that the application is both confusing and incomplete. At times I have found the documentation to be clearly erroneous and at other times misleading. In the following section of my representation I will try to highlight the concerns I have with the application form and the documentation submitted in support of the application. In the next sections I will try to list my comments on the application form and various documents submitted.</p>	
IRL/35	<p><b>1.1 APPLICATION FORM</b></p> <p>1. Item 1.1 states that the works relate to a "landing site" at Loughshinny.</p> <p>This is misleading and conflicts with the entry in item 2.5 of the application form which indicates that the works also involve 29.8 kilometres of subsea cable.</p>	<p>The proposed telecommunication cable will progress from the Welsh / Irish median line to the landing site at Loughshinny. The section of cable within the territorial waters to Mean High Water Springs requires a Foreshore Licence. The project constitutes the submarine cable to the cable landing site at Loughshinny. Section 1.7 requests information pertaining to previous applications the applicant may hold. This section of the application form demonstrates the previous and current applications being sought by the applicant as requested.</p>
IRL/36	<p>2. Item 1.7 states "America Europe Connect 2 Limited has made an application for a foreshore licence for the Havfrue Cable System on 26th October 2019". This is clearly incorrect as it is still only September 2019.</p> <p>3. Item 2.4 states that "The application area consists of an installation corridor of the surveyed area". I find this statement to be unclear and quite confusing.</p>	<p>Please refer to response ref IRL/03.</p>
IRL/37	<p>4. Item 2.4 states that "the total area of the foreshore area" is 1446 hectares (14.46 km<sup>2</sup>). This is a massive area of foreshore and may have major implications in terms reservation or restriction of the foreshore. It is also unreasonable if, as stated, the as-laid cable footprint will be approximately 1 metre. No justification has been stated for the requirement for a Foreshore Licence covering 1446 hectares.</p>	<p>The area of foreshore applied for is 1446 hectares. This equates to an application corridor of approximately 30km long by 500m wide with narrowing in the harbour area at Loughshinny to approximately 250m wide. The 'Foreshore' area that the Foreshore Licence is being applied for covers the area from the coast out to the Irish Territorial Water boundary (12 nautical miles), hence the 1446 hectare calculation. This application area allows for the cable installation to take place anywhere within this corridor such that micro-routing can be undertaken to avoid sensitive habitats and other seabed features of importance, or that may prove difficult for installation. The actual installation corridor of the cable itself would equate to approximately 10m wide for the length of the cable, to allow for the installation equipment, with the rest of the application area unaffected.</p> <p>Please also refer to response ref IRL/03.</p>
IRL/38	<p>5. Item 5.11 of the application specifically indicates that the area does not adjoin a listed archaeological site or monument. The headland at Drumnaigh bounds Loughshinny Bay to the south and is acknowledged to be rich in archaeology with 10 monuments listed on the Record of Monuments and Places by the Archaeological Survey of Ireland and are subject to Preservation Orders since 1977. They include a Martello tower, an Iron Age coastal promontory Fort, earthen enclosures and evidence of extensive connections to the Roman world through trading (by sea). Including artefacts of notable importance which include Roman coins, Gallo-Roman pottery and copper ingots. There is also the remains of a Fosse Earthwork on the eroding sea cliffs south of Loughshinny harbour. As such the entry on the application sites adjacent to Loughshinny and the proposed cable installation site is both a critical and material omission as it specifically disregards the archaeological significance of the site and also its potential relevance to the foreshore at Loughshinny and the surrounding area.</p> <p>Furthermore items 5.12 &amp; 5.13 relate to item 5.11 and insofar as item 5.11 does not acknowledge the archaeological site at Drumnaigh, the responses in items 5.12 and 5.13 are probably also incorrect and should be considered unacceptable pending a review.</p> <p><b>1.2 THE PLANNING REPORT</b></p>	<p>Please refer to response ref IRL/02.</p>
IRL/39	<p>Section 2.3 of the Planning Report deals with Route Development and outlines the basis for the selection of Loughshinny.</p> <p>Whilst the characteristics of Loughshinny Bay are discussed, there is no indication of any alternative routing within the bay and there is no attempt to optimise the route or to justify the routing through the middle of the bay and up the centre of the beach.</p>	<p>A cable route study was conducted prior to developing the proposed Loughshinny Route. A number of alternative landing locations were reviewed and subsequently discounted including Donnabate and Portrane beaches, as described in the Planning Report. A number of engineering and environmental aspects are considered in identification of an appropriate route. Loughshinny harbour provides a solution to engineering, environmental and archaeological constraints identified at the alternative landing locations.</p>
IRL/40	<p>means "a measure or a combination of measures that, in relation to Article 6(3) of the Habitats Directive, has the effect of ensuring that a plan or project, individually or in combination with other plans or projects, will not have a significant effect on, or adversely affect the integrity of, a European Site". Mitigation is required to protect this feature of interest of Rockabill to Dalkey SAC (Harbour porpoise). In addition, the mitigation in relation to Halichoerus grypus (Grey Seal) and Phoca vitulina (Harbour Seal), features of interest of Lambay Island SAC, are detailed. Mitigation measures relating to features of interest would normally be covered in a Stage II Natura Impact Statement. However, on this basis the document does not follow the EU guidance on Appropriate Assessment and the absence of a Stage II- Natura Impact Statement is a significant omission.</p> <p><b>APPROPRIATE ASSESSMENT SCREENING</b></p>	<p>Please refer to response ref IRL/17.</p>
IRL/41	<p>5a) Management Of a Natura 2000 Site As outlined in the Habitat Regulations 2011 "(g) The public authority shall determine that an Appropriate Assessment of a plan or project is required where the plan or project is not directly connected with or necessary to the management of the site as a European Site and if it cannot be excluded, on the basis of objective scientific information following screening under this Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site." No such information has been provided in the AA screening with the result that there is insufficient information for its determination.</p> <p>5b) In combination effects</p>	<p>The report successfully identifies all relevant protected sites within the Zone of Influence of the proposed cable corridor, and through thorough assessment of the conservation objectives of potentially affected sites, using data gathered in several surveys for the purpose of this assessment and available online literature, no lasting adverse effects to the integrity of these sites were identified as a result of the installation and maintenance activities or in-combination with other projects. As such a Stage 2 Appropriate Assessment is not required for this project.</p>
IRL/42	<p>It is not clear from the project if there are future in combination effects? It is contended that the full context of the project should be taken into consideration. However, this has not been done and accordingly all "in combination" effects have not been assessed.</p>	<p>In-Combination effects are discussed in Section 5-5. For in-combination effects to be screened in, there must be a spatial and temporal overlap between the proposed projects.</p> <p>Please also refer to response ref IRL/26.</p>
IRL/43	<p>5c) The version of this document is a "Draft for client comment". It therefore appears that there may be a final version of the document.</p>	<p>The document submitted is the final version of the Stage 1 Screening for Appropriate Assessment Natura Impact Statement. The "Draft for client comment" refers to the date the document was submitted to the client to gather comments on 5/07/2019. Relevant changes were then made prior to the submission of the "Final" document on 10/07/2019</p>

IRL/44	<p>5f) Section 2 of the report does not detail the most up to date legislation in Ireland including the Habitats Regulations 2011. Therefore it is not clear if this Appropriate Assessment screening was undertaken in accordance with Part XAB of the Planning and Development Act 2000, as amended, in addition to the December 2009 publication from the Department of Environment, Heritage and Local Government; 'Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities' and the European Communities (Birds and Natural Habitats) Regulations 2011.</p> <p>In addition, as outlined in "Managing Natura 2000 sites, the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" (European Commission, 21 November 2018) "the purpose of the appropriate assessment is to assess the implications of the plan or project in respect of the site's conservation objectives, either individually or in combination with other plans or projects. The conclusions should enable the competent authorities to ascertain whether the plan or project will adversely affect the integrity of the site concerned. The focus of the appropriate assessment is therefore specifically on the species and/or the habitats for which the Natura 2000 site is designated."</p>	<p>Section 1.2 of the report (Legislative Context) details how the Appropriate Assessment process has been transposed into European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011), (as amended), and how the Habitats Regulations 2011 provides for the screening for Appropriate Assessment. The report states that the Natura Impact Statement was submitted to the Foreshore Unit pursuant to the Foreshore Acts 1933 - 2011. Sites that were screened in for further assessment of Likely Significant Effects due to potential pressure-receptor pathways were assessed in respect of their site specific conservation objectives, with these objectives being detailed in each individual case. As such the assessment of each site focused specifically on the features for which the Natura 2000 site was designated. As a result of this assessment, no Likely Significant Effects to any site were found, precluding the requirement for Stage 2 Appropriate Assessment.</p>
IRL/45	<p>5e) Section 3 Table 3.1. The AA screening outlines the embedded mitigation of the project as follows: "Minimisation of disturbance to sediments, habitats and species" i.e. measures to protect the Reef Habitat (Feature of Interest of Rockabill to Dalkey SAC), Harbour porpoise (Feature of Interest of Rockabill to Dalkey SAC), and seals (Harbour and Grey Seals are features of interest of Lambay Island SAC) "Protection of marine mammals" i.e. measures to protect Harbour porpoise (Feature of Interest of Rockabill to Dalkey SAC), and seals (Harbour and Grey Seals are features of interest of Lambay Island SAC)</p> <p>The implementation of these mitigation measures are specifically targeting features of interest of Natura 2000 sites which triggers a stage II Natura Impact Statement.</p> <p>This is supported by the statement in section 4 where it is stated that "The receptors which could potentially be affected by the proposed installation and maintenance activities and could be the Qualifying Interest features of Natura 2000 sites in the region are: benthic habitats; fish, birds; and marine mammals." The mitigation measures are therefore aiming to prevent impacts on the Features of Interest of Natura 2000 sites and therefore a Stage II NIS is required.</p>	<p>These mitigation measures were not considered in any capacity when conducting the Stage 1 - Appropriate Assessment Screening, with no mention of them in the assessment being used to affirm any claim. A disclaimer has now been added to this section to clarify this. Additionally, please refer to responses ref IRL/17 &amp; IRL/32.</p>
IRL/46	<p>5f) Section 4.1.1 states that "A4.21 (Echinoderms and crustose communities on circalittoral rock) being recorded at a depth of between 7 and 8m below sea level (BSL)."</p> <p>This is supposed to be a sediment community? Does this mean that the cable will be laid on circalittoral rock at the entrance to Loughshinny? However, it is not clear if this is actually present on the habitat map provided.</p>	<p>"A4.21 Echinoderms and crustose communities on circalittoral rock" is a recognised EUNIS community and is not sediment based (refer to <a href="https://eunis.eea.europa.eu/habitats/5419">https://eunis.eea.europa.eu/habitats/5419</a>).</p> <p>The proposed cable route intersects two points at which it will be laid upon circalittoral rock. Covering a length of 33.7m and 113.7m (147.4m) upon entrance to Loughshinny as now shown in the revised Benthic Habitats Map (See image).</p>
IRL/47	<p>5g) The Benthic Habitats map provided is difficult to interpret. It is not known what the red lines are within Loughshinny Harbour are e.g. other cables or they survey corridor? If this is the survey corridor it does not appear to coincide with the points provided in the submission. In addition, the colours used for the habitats are too similar to understand the habitats on site in Loughshinny. This is important to an understanding of the potential for overwintering birds e.g.</p> <p>All solid green labels A1 Littoral rock A1.2143 Fucus serratus and piddocks on lower eulittoral soft rock A1.3132 Fucus vesiculosus on mid eulittoral mixed substrata A1.3152 Fucus serratus on full salinity lower eulittoral mixed substrata A1.45 Ephemeral green or red seaweed communities (freshwater or sand-influenced) on non-mobile substrata All solid pink purple labels A1.311 Pelvetia canaliculata on sheltered littoral fringe rock A1.3131 Fucus vesiculosus on full salinity moderately exposed to sheltered mid eulittoral rock A1.413 Seaweeds in Sediment-Floored Eulittoral Rockpools A2.245 VI Lanice conchlega in littoral sand - variant 1 All solid blue labels A2.21 Strandline A2.22 v2 Barren or amphipod-dominated mobile sand shores - variant 2 A2.4 Littoral mixed sediment B3.111 Yellow and Grey Lichens on Supralittoral Rock</p>	<p>The Benthic Habitats map (Drawing no: P2228-HAB-008) has been revised to give a clearer indication of the varying benthic habitats. A wider colour range has been used for ease of understanding and the offshore survey areas have been changed to a hatched effect for clearer distinction.</p> <p>Upon reviewing both the Benthic Habitats map provided in the AA (Drawing no:P2228-HAB-008) and the Foreshore Licence map (Drawing no: P2228-CORR-006), the route for cable installation and survey corridors is shown to be identical. For clarity, the thicker red line represents the cable route and the thinner red lines represent the survey corridor.</p>
IRL/48	<p>5h) Reef is protected within Rockabill to Dalkey SAC. In section 4.1.1 of the report it states that "Another notable habitat found near the marine cable corridor is the Annex 1 subtidal reef habitat found throughout the Rockabill to Dalkey Island SAC as intertidal and subtidal reef surrounding headlands and the offshore islands. The subtidal reefs are home to a range of species including Laminaria hyperborea, soft corals (Alcyonium digitatum), blue mussel (Mytilus edulis) and the common sea star (Asterias rubens), among other species (NPWS 2014b). No reef habitats has been identified within the marine cable corridor. The corridor passes within approximately 2km of the nearest identified reef habitat within the SAC according to the latest available reef survey data (NPWS 2013d)."</p> <p>There is clearly an outcrop of reef within the survey corridor near way point (-6.0187, 53.5505), with larger more pronounced subtidal reef areas immediately to the south of the corridor in this area. The impact of the proposed cable route on this feature of interest OF Rockabill to Dalkey SAC has not been addressed sufficiently. With vessel speeds of up to 14kn being quoted it is not clear if there will be a significant impact on reef in this area.</p>	<p>Analysis of the current data as available on the National Parks and Wildlife Service, along with the Benthic Characterisation Report conducted for the route (Appendix I3) did not indicate the presence of reef habitat within the survey corridor. Way point -6.0187, 53.5505 is located at the very edge of the survey corridor, as such the cable route will not pass directly through this area of seabed. Any potential areas of reef found at this location or south of the survey corridor will not be significantly affected by the project due to the minimal distance at which medium-to-large grain sediment will be dispersed in a worst-case scenario (see Appendix H)</p> <p>The source of the data is "The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments" <a href="https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf">https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf</a>.</p> <p>The relevant species protected under European Communities (Natural Habitats) Regulations (S.J 94 of 1997)</p> <p>River lamprey (covered in the report) Pollan (<i>Coregonus autumnalis</i> spp.). Only found in freshwater lochs in Ireland, will not interact with the marine cable route (NPWS, 2019) Salmon <i>Salmo salar</i> (Covered in the report) Freshwater pearl mussel <i>Margaritifera margaritifera</i> (Species is not present within the marine cable corridor, being a freshwater species, and so will not be significantly affected by the project) Grey seal (<i>Halichoerus grypus</i>) (Covered in section 4.4 of the report) Harbour seal (<i>Phoca vitulina</i>) (Covered in Section 4.4 of the report) Allis shad (<i>Alosa alosa</i>) - While samples of the species have been caught off the south-east coast of Ireland, Allis shad is considered a vagrant species in Irish waters due to the minimal recordings of the species both in the marine environment and, owing to the species diadromous nature, in Irish river systems (NPWS 2019). As such it is unlikely the proposed cable route will interact with the species at any point along its' route. Twaitte shad (<i>Alosa fallax</i>) - Diadromous species that reside in estuaries and coastal waters, returning upriver to spawn in late May to early June (NPWS 2019). Surveys have indicated located migrating adults in rivers to the south/south-east of Ireland (Blackwater, Suir, Barrow and Nore). There exists the possibility that foraging shad may be found within the nearshore area of the marine cable corridor, but due to the species spawning upriver there will be no interaction with their spawning habitat. (It should be noted that the shad species were not considered relevant when the initial assessment was carried out due to the low likelihood of their presence in the cable corridor) NPWS. (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. [Online]. Available at: <a href="https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf">https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf</a> [Accessed 23 October 2019].</p>
IRL/49	<p>5j) 42.2 "Four Annex II listed fish species are likely to be found within or near to the marine cable corridor at certain times of the year"</p> <p>The source of these data has not been identified. Species protected under National legislation have not been included anywhere.</p>	<p>The relevant species protected under European Communities (Natural Habitats) Regulations (S.J 94 of 1997)</p> <p>River lamprey (covered in the report) Pollan (<i>Coregonus autumnalis</i> spp.). Only found in freshwater lochs in Ireland, will not interact with the marine cable route (NPWS, 2019) Salmon <i>Salmo salar</i> (Covered in the report) Freshwater pearl mussel <i>Margaritifera margaritifera</i> (Species is not present within the marine cable corridor, being a freshwater species, and so will not be significantly affected by the project) Grey seal (<i>Halichoerus grypus</i>) (Covered in section 4.4 of the report) Harbour seal (<i>Phoca vitulina</i>) (Covered in Section 4.4 of the report) Allis shad (<i>Alosa alosa</i>) - While samples of the species have been caught off the south-east coast of Ireland, Allis shad is considered a vagrant species in Irish waters due to the minimal recordings of the species both in the marine environment and, owing to the species diadromous nature, in Irish river systems (NPWS 2019). As such it is unlikely the proposed cable route will interact with the species at any point along its' route. Twaitte shad (<i>Alosa fallax</i>) - Diadromous species that reside in estuaries and coastal waters, returning upriver to spawn in late May to early June (NPWS 2019). Surveys have indicated located migrating adults in rivers to the south/south-east of Ireland (Blackwater, Suir, Barrow and Nore). There exists the possibility that foraging shad may be found within the nearshore area of the marine cable corridor, but due to the species spawning upriver there will be no interaction with their spawning habitat. (It should be noted that the shad species were not considered relevant when the initial assessment was carried out due to the low likelihood of their presence in the cable corridor) NPWS. (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. [Online]. Available at: <a href="https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf">https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf</a> [Accessed 23 October 2019].</p>
IRL/50	<p>5j) Section 4.3, "SPA's within 30km"</p> <p>The report includes SPA's within 30 km of the route. However, Dalkey Islands SPA, Boyne Estuary SPA, River Boyne and River Blackwater SPA, Howth Head Coast SPA, North Bull Island SPA and South Dublin Bay and River Tolka Estuary are all within 30km of the proposed works and have not been listed. There are no details of SACs within 30km just Annex II listed pinniped species &amp; Annex II and IV listed cetacean species.</p>	<p>Section 4.3 is specifically for SPA's with bird species as the qualifying interest. As stated in Table 5-1 the furthest zone of influence for bird species, determined from the baseline studies, is 10km. This is the distance used to locate possibly affected SPAs. The title of section 4.3: "SPAs within 30km" is incorrect and should be "SPAs within 10km". No SAC's are mentioned in this section as bird species are not protected under SAC regulations.</p> <p>Annex II listed pinnipeds - Grey seals and harbour seal are listed as qualifying interests for Lambay Island SAC in Section 4.4. Lambay Island SAC is 5.33km from the cable corridor. The zone of influence for pinnipeds, determined from the baseline study, is 130m for underwater noise and 900m for visual disturbance.</p> <p>Annex II &amp; Annex IV listed cetaceans - Rockabill to Dalkey Island SAC and Cardigan Bay SAC are both listed (in Section 4.5) as the closest SAC's to the marine cable route. Section 4.5.2 further states SAC's designated for Harbour Porpoise located between 7kn and 222km from the marine cable.</p>
IRL/51	<p>5l) Table 5-2 Pressures scoped out of the assessment and the reason for exclusion. This states "pressure Screened Out of EIA"</p> <p>This is an AA screening and not an EIA and these pressures do not relate to the potential pressures outlined in Table 5.1.</p>	<p>This is a typo and should state "Pressures scoped out of Appropriate Assessment"</p>
IRL/52	<p>5m) Table 5-3 Initial screening of relevant Natura 2000 sites.</p> <p>There is no defined distance or details to say why these sites were chosen and other sites were excluded. The document does not include a complete list of SAC's shown within the potential zone of influence.</p> <p>In relation to reef in the Rockabill to Dalkey SAC the report states that "Seabed preparation and cable burial will cause a brief, localised increase in suspended sediment in the water column with subsequent re- deposition of sediment on surrounding habitats. Sessile and less mobile epifauna and infauna in surface sediments are most likely to be affected. Coarser sediments from the cable installation and maintenance activities will be deposited close to the cable route (within 107m)."</p> <p>There has been no modelling in this area and it does not state where these figures are coming from. Reef is within proximity to the proposed works and this would not be deemed to be sufficient objective scientific information to "Screen Out"</p> <p>"Low tide bird count data for Loughshinny landing site indicate the intertidal area is not of high importance to Overwintering wading birds (I-WeBS 2019).</p> <p>This has been stated in relation to several SPA's and the reason for screening out. However, in the same table it states that "Light-bellied Brent gosse have been recorded at the Loughshinny landfill site in previous winters in significant numbers, with a mean of 86 individuals between the winters of 2011/12 to 2015/16 (BirdWatch Ireland 2019)." There are clearly inconsistencies here in this table and SPA's are getting screened out incorrectly. For example Light-bellied Brent gosse is a feature OF interest in Rogerstown Estuary SPA but is has been screened out with the statement "Overwintering migratory waterfowl are unlikely to be foraging within the offshore marine cable corridor (preferring intertidal areas for foraging). Low tide bird count data for Loughshinny landing site indicate the intertidal area is not OF high importance to overwintering wading birds (I-WeBS 2019)." This clearly contradicts the reason for screening out Malahide Estuary SPA and Baldoyle Bay SPA.</p> <p>A significant number of Irish SAC's within 30km of the project have been omitted. However, for some unknown reason a substantial number OF UK SACs have been included.</p>	<p>As written in Section 5.3.3 "All Natura 2000 sites which are within the search areas outlined in Table 5-1 have been screened for relevant Qualifying Interests". Table 5-1, Row 6 (titled "Search area and justification") outlines the distances and reasonings behind the screening of the Natura 2000 sites.</p> <p>As written in Section 5.3.3 "There are no candidate SAC's (eSACs) within the search area".</p> <p>Modelling of sediment suspension and dispersion can be found in Appendix H. This appendix shows the disturbance, assumptions and calculations of the suspension to be caused by the planned project.</p> <p>We acknowledge and accept this contradiction that Rogerstown Estuary SPA perhaps should not have been screened out, however, the likelihood of interaction between installation and maintenance works and the receptor (Light-Bellied Brent gosse) is low. Alongside this, there is alternative habitat in the area and any temporary and localised disturbance to Light-Bellied Brent gosse that may originate from Rogerstown Estuary SPA, Malahide Estuary SPA and Baldoyle Bay SPA is expected to be low and insignificant (as further stated in Table 6-1).</p> <p>Irish SAC's were only included if within 10km of the proposed cable route and application corridor. UK SACs are included as mobile marine mammals are covered under the legislation. These mobile marine mammals have a likelihood of entering the application corridor.</p>

IRL/53	5n) The possibility and quantification of possible trans-boundary effects has not been addressed in the AA screening.	This Stage 1 Screening for Appropriate Assessment solely covers all possible effects within the Irish EEZ. A separate Stage 1 Screening for Appropriate Assessment for the Irish Sea in UK territorial waters is available to view online at <a href="https://marinelicensing.marinemangement.org.uk/mmofox5/fox/live/">https://marinelicensing.marinemangement.org.uk/mmofox5/fox/live/</a> , under the case reference MLA/2019/00321.
IRL/54	50) Table 5-4 Summary of sites screened for possible likely significant effects. This table has clearly omitted a number of Natura 2000 sites potentially impacted.	The findings of the Natura 2000 Screening Assessment used route corridor specific survey data and most recently available bird and marine mammal count data available at the time of writing. All Natura 2000 sites found to have potential impacts have been included.
IRL/55	5p) The AA Screening in section 5.43 states that "The screening of Natura 2000 sites identified a 'possible' pressure-receptor pathway between the proposed installation and maintenance activities and the Qualifying Interests of seven sites for the pressure underwater sound changes (Table 5-3). Two of these sites are within Irish territorial waters, Rockabill to Dalkey Island SAC and the Lambay Island SAC, designated for Annex II harbour porpoise and pinniped species respectively. The other five sites are within UK waters: "North Anglesey Marine SAC, Lleyn Peninsular and Sarnau SAC, West Wales Marine SAC, North Channel SAC and Bristol Channel SAC".	This is correct, seven sites were identified as featuring a potential pressure-receptor pathway for underwater sound changes, with these sites being grouped together due to the pathway being identical between each site, therefore avoiding repetition.
IRL/56	5q) Section 5.5 In combination effects The project does not assess the potential in combination implications Of all elements of the project.	In-Combination effects for the proposed cable installations project are discussed in Section 5-5. All pressures are assessed through to pressure-receptor pathway assessment. This concluded only three receptors (Habitat, birds and marine mammals) will be affected by four varying pressures (Penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion, Siltation rate changes, including smothering (depth of vertical sediment overburden), Visual disturbance and Underwater noise changes). For in-combination effects to be screened in, there must be a spatial and temporal overlap between the proposed projects. Please also refer to response ref IRL/26.
IRL/57	5p) The report states that in conclusion "The proposed project does not have the potential to give rise to significant adverse effects on the overall integrity of the Natura 2000 sites considered. Therefore, this assessment has stopped at Stage 1 screening and there should be no further requirement for Stage 2 Appropriate Assessment." It is to be noted that the report outlines mitigation measures to protect the features of interest of Natura 2000 sites (harbour porpoise, grey seals, harbour seals and reef), which in itself, is reason alone to require a Stage II Natura Impact Statement.	Please refer to response ref IRL/17.
IRL/58	This assessment suffers from: • A significant lack of supporting objective scientific information where it clearly has not included all of the Natura 2000 sites within the 30km defined zone of assessment, • An inherent contradiction in relation to the screening-out process in relation to overwintering birds in Loughshinny, • The omission of reference to reef within and proximate to the survey corridor (that is within the Rockabill to Dalkey SAC), • A failure to assess in combination effects of all elements of the project, • A failure to assess the trans-boundary effects of the project. • A failure to adequately assess the potential impacts on Natura 2000 sites	Please see above responses to these statements.
IRL/59	I only became aware of the newspaper notice in the Northside News last evening relating to a Foreshore licence, and I am now both confused and bothered by its wording, so much so that I am unaware of the legal status of the notice, and the legal status of the submission I made to the department with regard to what appears to be the same Foreshore application. Could you please revert to me as soon as possible in order to explain the necessity and legality of the said advertisement, an examination and review of same I have clearly been excluded from.	Please refer to response ref IRL/04.