

SSE Renewables
Red Oak South
South County Bus. Park
Leopardstown
Dublin 18
22 November 2019

██████████
Foreshore Section
Department of Housing, Planning and Local Government
Newtown Road
Wexford

Dear ██████████

RE: FS 006983 – FORESHORE LICENCE APPLICATION BY SSE RENEWABLES FOR SITE INVESTIGATION

SSE Renewables acknowledges receipt of the observations made by the Marine Survey Office (dated 19 June 2019), the Marine Institute (dated 27 June 2019), the Department of Agriculture, food and the Marine (DAFM) (dated 11 July 2019), the Department of Culture, Heritage and the Gaeltacht (DCH) (dated 26 July 2019), Waterford City & County Council (dated 06 August 2019), Inland Fisheries Ireland (IFI) (dated 10 August 2019) and the Department for Housing, Planning and Local Government's Water and Marine Advisor (dated 15 October 2019). SSE Renewables are grateful to the prescribed bodies for their review of the Foreshore Licence Application and welcome the observations made.

The IFA response covers several points as summarised below:

1. Request for mitigation with respect to underwater noise generation e.g. soft-start and ramp-up procedures, duration of noise-generating activities reduced to necessary to collect results of sufficient quality etc.
2. Request for mitigation to reduce the duration of noise generating surveys and to agree timing of works to not interfere with migration times of fish life stages or scientific studies in the area.
3. Request that the proposed geophysical survey takes the shad movements into account and avoids the period of spawning movements i.e. May – Early June.
4. Advice of SFPA should be sought in regard to impacts on the eggs/larvae and adult life stages of commercially important.
5. IFI considers that this potential for cumulative impacts is one that requires consideration by Foreshore Division. The potential for data sharing, however commercially unusual or contrary this might seem, must be considered in the context of reducing adverse environmental impact.

With respect to point 1, SSE Renewables is committed to following the technical guidance provided in Section 4.3.4 of the "Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters" (January 2014 edition). Whilst it is acknowledged that this guidance focuses on minimising effects on marine mammals rather than fish it requires that the same principles as suggest by the IFI are followed e.g. soft-start, power ramps etc.

With respect to points 2 and 3 SSE Renewables would like to request that a seasonal restriction is not imposed on the activities for the following reasons. As detailed in the assessment in Section 4.5.1, the survey will be temporary and transient and will not act as a barrier to fish entering the rivers. It is also expected that any fish species susceptible to stress and within range of the potential noise impact would be able to maintain adequate

separation. In addition, fish will avoid the survey area once operations have started and are extremely unlikely to move towards the sound source. Therefore, it is unlikely that fish will experience a significant impact other than temporary displacement from the immediate area surrounding the survey activity and they are expected to return to the area once the survey is complete. The Natura Impact Statement concluded no likely significant effects to twaite shad and Atlantic salmon, qualifying features of the River Barrow and River Nore SAC, Lower River Suir SAC and Blackwater River (Cork/Waterford) SAC.

In response to point 4 the Sea Fisheries Protection Authority were consulted by the Foreshore Division and have not indicated that any seasonal restrictions on the geophysical survey are necessary.


In response to point 5, there is potential for temporary and slight cumulative effects as a result of underwater noise on fish species in the application area. The subject of careful consideration of cumulative and in-combination effects was also raised by Waterford City & County Council. SSE Renewables will liaise with Greenlink Interconnector Limited, Energia Renewables ROI Ltd and Ireland-France Subsea Cable Limited to determine whether survey schedules will overlap. Efforts will be made to coordinate survey activities in a manner that reduces cumulative effects.

Respondents made reference to our commitment to employ a Fisheries Liaison Officer. An individual will be appointed to this role and will be in contact with the Sea Fisheries Protection Authority, Marine Institute and Inland Fisheries Ireland, as well as regional and local fishing organisations at least 1-month prior to the start of any proposed site investigation survey works. In addition, we note the Department of Culture, Heritage and the Gaeltacht's request that a suitably qualified and experienced archaeologist shall be engaged. SSE Renewables will appoint an individual to this role and as per recommendation, an application for relevant survey licences shall be submitted.

We note the Marine Survey Office's request for marine consultation at a very early stage, with local harbour authorities, and the Irish Coast Guard and the Commissioners of Irish Lights with respect to the potential impact on traffic routing via the Tuskar Traffic Separation Scheme (T.S.S.). We will undertake early stage consultation as requested. SSE Renewables' intention is to ensure that all members of the public, any interest groups and relevant bodies are kept fully informed and engaged prior to and during the proposed site investigation works.

SSE Renewables note that there are no objections to the proposed site investigation works and we have no concerns regarding the conditions outlined by the Marine Institute and Water and Marine Advisor being included in a Foreshore Licence if granted.

Yours Sincerely,



Project Manager – Offshore Development