



MERC Consultants
environmental and conservation services

Non-statutory Environmental Analysis

FS006915: Celtix Connect – Havhingsten Telecommunication
Cable. Foreshore Application

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1. Assessment under the under the Foreshore Act 1933, as amended and the EIA Directive

Under the Foreshore Act as amended, the appropriate Minister is required, as part of his consideration of a relevant application and before a decision on the application is given, to undertake an environmental impact assessment of projects likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location.

The objective of Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the Environmental Impact Assessment, or EIA, Directive) is to ensure that projects that are likely to have a significant effect on the environment are adequately assessed before they are approved. An EIA is required for all projects detailed in Annex I of the EIA Directive and for all projects detailed in Annex II where the proposed project is likely to have significant effects on the environment.

The proposed project “Havhingsten fibre-optic telecommunication cable landing at Loughshinny, Co. Dublin” does not fall within the classes defined under Annex I or Annex II of the EIA Directive. Therefore, it is not subject to the provisions of the EIA Directive.

An environmental report for the proposed project is presented in table 1.

Table 1. Environmental report

Characteristics of the proposed project
Overview of the proposed project
Installation of a submarine fibre optic cable on the foreshore extending from Loughshinny in North Dublin to Squires Gate Lane (south of Blackpool in England). Total cable length in Irish waters (territorial and exclusion economic zone) of approximately 55.7km of which 29.8km is within the Irish territorial waters. This section will also include two branches onto the Isle of Mann and the North Sea from the Seaton Sluice (on the east coast of the UK, north of Newcastle), to Houstrup on the west coast of the Jutland peninsular in Denmark. The cable will ultimately be linked to a single storey cable landing station at ESB Loughshinny 38kv Substation (under Planning Ref no F19A/0169).
Project Design
From the MHWS, at Loughshinny strand, south of the pier, seaward the 40mm diameter cable will be buried to a target depth of 1.5m – 2m below the seabed. The cable will be buried using water jetting and ploughing. The cable lay will be performed by an installation vessel with a dynamic positioning system, anchors are unlikely to be used due to current speeds. Where divers are deployed, anchors may be a requirement for safety reasons. The cable route is predominately composed of sands and clay, there were no obvious areas where cable burial may be significantly less than target depth.
Environmental baseline
The environmental baseline is presented in the Screening for Appropriate Assessment report submitted with the Foreshore application and summarised below. The seabed sediments within the marine cable corridor at the cable landing site at Loughshinny and offshore are fairly homogenous, with muddy sand characterising the majority of the seabed. This differs closer to shore where the European Nature Information System (EUNIS) biotope complex A4.21 (Echinoderms and crustose communities on circalittoral rock) is recorded at a depth of between 7 and 8m below sea level (BSL). The sediment here consists of boulder/bedrock outcrops with sand in between. The corridor passes within approximately 2km of the nearest identified reef habitat within Rockabill to Dalkey Island SAC. Three Annex II listed fish species are likely to be found within or near to the marine cable corridor at certain times of the year: <ul style="list-style-type: none"> • Sea lamprey (<i>Petromyzon marinus</i>) – late April to early June; • River lamprey (<i>Lampetra fluviatilis</i>) – September to June; • Atlantic salmon (<i>Salmo salar</i>) – May to June and autumn months; and

The intertidal area around Loughshinny provides a sheltered intertidal feeding resource for overwintering seabirds and foraging tern species during the breeding season, in addition to habitat provided within the SPAs designated in the region. Review of low tide count data between 2011 and 2016 indicates that the landing site is occasionally important for two species of wading birds; turnstone and sanderling. The count data for these species indicates annual peak counts above nationally important numbers (1% of the all-Ireland population during November for turnstone and December for sanderling. Large numbers of grey plover were recorded during 2011/12 however numbers are generally low. The remainder of the overwintering period numbers are below nationally important numbers within Loughshinny bay.

Annual peak counts above nationally important numbers have been recorded of ringed plover on the Skerries coast. All other species recorded are present at the landing site during the winter but not in nationally important numbers. While the summer months are quieter in terms of overall bird numbers, the season is still important for several species including terns which breed in the summer months. Around the Loughshinny coast in the summer, the roseate tern can be found feeding offshore on sand eel and sprat. The roseate tern has two breeding grounds in Ireland, one of which is on the nearby island of Rockabill. This breeding colony is the most important in Europe, holding up to 1200 breeding pairs. There is also a resident breeding colony of northern fulmar that is present during the summer months at Loughshinny, with 113 individuals being recorded here.

Scale of the project

The construction works will take approximately 6 weeks to complete. The cable is likely to have a life span of 25 years. All components will be subsea/underground.

Cumulative impacts

The Screening for Appropriate Assessment that accompanied the Foreshore planning application recorded four (4) projects within 10km of the proposed installation plus, following an RFI related to the screening report, an additional application which post-dated the original screening. It assessed these projects and associated maintenance activities and excluded any potential cumulative effects.

It is noted that the guidelines for ecological impact assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) state that cumulative impacts may be either (1) Additive/incremental. e.g. multiple activities/projects (each with potentially insignificant effects) added together to give rise to a significant effect due to their proximity in time and space or (2) associated/connected – a development activity enables another development activity e.g., phased development as part of separate planning applications. Associated developments may include different aspects of the project which may be authorised under different consent processes. It is important to assess impacts of the project as a whole and not ignore impacts that fall under a separate consent process.

The proposed project is also associated with a landing station at Loughshinny, Co. Dublin (Fingal Co. Co Planning reference: F19A/0169). This project was subject to separate screening for appropriate assessment which determined that “In view of best scientific knowledge and in view of the conservation objectives of the European sites, the proposed project, individually or in combination with other plans or projects will not have a significant effect on any European site.” This report, and the Appropriate Assessment Screening for the proposed project, has assessed both projects, to ascertain if any potential for cumulative impacts are possible. No significant impacts resulting from either project were identified and no pressure pathway between the two projects that could facilitate cumulative impacts have been identified. It is therefore considered that cumulative effects have been sufficiently and correctly addressed.

Considered cumulatively with other adjacent proposed development works no cumulative impacts are considered likely.

Significance of the proposed works

The proposed project will be undertaken according to the scope of works proposed in the planning report (P2228_R4693_Rev 5. December 2019) which accompanies the foreshore application. This document has been reviewed against sensitive receptors within the zone of influence and it is considered that, the nature of the proposed work is insignificant relative to the potential pressures identified.

Use of natural resources

While temporary disturbance of the foreshore will occur, no natural resources will be used.
Waste production
Project vessels will be equipped with waste disposal facilities (sewage treatment or waste storage) to IMO MARPOL Annex IV Prevention of Pollution from Ships standards. No significant waste production is anticipated.
Pollution risk
Project vessels will be in compliance with IMO MARPOL Annex IV Prevention of Pollution from Ships standards. No pollution risk has been identified.
Nuisance
<p>Installation at the Loughshinny landing site will temporarily restrict movements to small fishing vessels potentially accessing the harbour area for up to 3 days. It is noted that the effects of these restrictions are to be managed through good communication via the Alcatel Submarine Networks (ASN) and an appointed Fisheries Liaison Officer (FLO) for the project. Further restrictions during route clearance, PLGR, cable lay are recorded in the planning report (P2228_R4693_Rev 5. December 2019). It is proposed these will be managed through the embedded mitigation detailed in this report. Temporary restrictions will also apply to recreational beach users at Loughshinny beach. However, such restrictions on the beach will be temporary and occur during periods of low beach use with works taking place in this area between the months of October to May.</p> <p>It is considered that the temporary nature of the proposed works and proposed embedded mitigation are appropriate to the scope and scale of the project and the resultant nuisance effects of the project on commercial and recreational users of the area will be insignificant.</p>
In-combination effects
No in-combination effects have been identified.
Location of the Proposed Development
Potential to impact European sites (SAC's and SPA's) and to NHA's and pNHA's
<p>A screening for appropriate assessment has been prepared by the applicant and an appropriate assessment screening has been undertaken by the competent authority. No direct or indirect impacts on the conservation interests of any European site has been identified.</p> <p>The nearest NHA to the proposed project site is Skerries Islands NHA which is coincident with the boundaries of Skerries Islands SPA.</p> <p>Proposed Natural Heritage Areas (pNHA) were published on a non-statutory basis in 1995. They have not since been statutorily proposed or designated.</p> <p>Loughshinny Coast pNHA is located 1.15km north of the proposed landfall location. The southern boundary of the site extends to the clay cliffs while the north end is bounded by a stream. This coastal area is noted for its geological interests, the rocks being conglomerates, limestones and shales. The main habitat of the site is coastal grass, which merges into a shingle/rocky shore with some patches of saltmarsh. Green-winged Orchid (<i>Orchis morio</i>) protected under the Flora Protection Order occurs onsite. A flush (potential Annex I habitat) was recorded at the northern end of the site. Coastal birds use the grasslands for roosting, including Curlew and Oystercatcher.</p> <p>Rogerstown Estuary pNHA is located approximately 3.5km south of the proposed landfall location at Loughshinny beach. The boundaries of which are coincident with those of Rogerstown Estuary SAC. It is a typical eastern estuary with fairly extensive intertidal sand and mud flats. Quality is variable owing to pollution from a number of sources, especially a large landfill site which was built on the mudflats. The salt marshes which fringe the estuary are of moderate importance and quality and include both Atlantic and Mediterranean salt meadows, as well as Salicornia flats. The sand dune element at site is limited in its distribution and quality. The site is of high importance for wintering waterfowl, with an internationally important population of <i>Branta bernicla horta</i> and nationally important populations of a further 16 species.</p> <p>With due consideration of the appropriate assessment screening report and consideration of the nearest NHA's and pNHA no potential for impact on these sites has been identified.</p>
Potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive

A screening for appropriate assessment has been prepared by the applicant and an appropriate assessment screening has been undertaken by the competent authority. No direct or indirect impacts on the conservation interests of any European site has been identified.

Potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive

No Annex I priority habitats occur within the footprint of the proposed project or its zone of influence. There is no potential for the project to lead to any impacts on an Annex I priority habitat.

Potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive

A screening for appropriate assessment has been prepared by the applicant and an appropriate assessment screening has been undertaken by the competent authority. No direct or indirect impacts on the conservation interests of any European site has been identified or any species listed in Annex II of the EU Habitats Directive.

Potential to impact directly or indirectly on any species listed as Annex IV in the EU Habitats Directive?

A screening for appropriate assessment has been prepared by the applicant and an appropriate assessment screening has been undertaken by the competent authority and confirms that Annex IV species will not be impacted by the proposed project.

Potential to impact directly or indirectly on any species listed as Annex I of the EU Birds Directive

A screening for appropriate assessment has been prepared by the applicant and an appropriate assessment screening has been undertaken by the competent authority and confirms that species listed on Annex I of the EU Birds Directive will not be impacted by the proposed project.

Potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act

The proposed works are confined to the foreshore and subtidally. The screening for appropriate assessment has confirmed that the project as proposed does not have the potential to impact of the breeding places of any bird species. No additional species have been identified within the zone of influence of the proposed project with the potential to be impacted.

Potential to impact directly or indirectly on existing land use

The proposed works are confined to the foreshore, there is no potential to impact existing land use.

Potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest

A desk-based assessment was undertaken to establish the archaeological baseline. This was updated with the results of a foreshore survey undertaken at Loughshinny, and a review of the geophysical data (out to 12nm limit) collected by the cable route survey. The Marine Archaeology Technical Report presents the resultant study which collates the findings of these activities.

The desk-based assessment comprised an introduction to the project area and the different assessment techniques used to conduct the foreshore archaeological survey at the landing site. The assessment concluded that there are no known potential cultural heritage assets or wrecks directly affected by the landing site in Loughshinny.

The Underwater Marine Archaeology Unit, of the Department Culture Heritage and the Gaeltacht have requested that the following be attached as conditions to the foreshore licence:

Exclusion Zones: An exclusion zone of at least 100m should be established around the furthest known extent of known wrecks located along the proposed cable route and any potential wreck sites discovered during the proposed marine surveys and development works. A map showing the location of all exclusion zones in relation to the proposed cable route should be forwarded to the National Monuments Service prior to the cable laying works proceeding.

Archaeological Monitoring: It is recommended that Archaeological Monitoring, as described below, be carried out of all proposed seabed disturbance works to take place as part of this development. This includes all cable installation works (such as trenching, diver jet burial and plough burial works) and the pre-lay grapnel run surveys.

The site investigation works should avoid locations of known wreck sites.

Archaeological Monitoring shall consist of the following:

1. In order to ensure the preservation of potential archaeological sites, wrecks and features the applicant is required to engage the services of a suitably qualified underwater archaeologist to monitor all disturbance works associated with the development including beach preparations works and foreshore works at the landfall, pre-lay grapnel run operations and cable burial operations. The archaeological monitoring shall be

licensed under the National Monuments Acts 1930-2004.

2. A detailed method statement shall accompany the licence application and shall include details on the proposed works, duration of works; archaeological monitoring team proposed and a find's retrieval strategy.

3. Should archaeological material be found during the course of monitoring, the archaeologist shall have the work in that area suspended, pending a decision as to how best to resolve the archaeology. The applicant shall be prepared to be advised by the Department of Culture, Heritage and the Gaeltacht with regard to any necessary mitigating action (e.g., avoidance, preservation in situ or excavation). The applicant shall facilitate the archaeologist in recording any material found.

4. The Department of Culture, Heritage and the Gaeltacht shall be furnished with a report describing the results of the monitoring. It is also recommended that an archaeological dive team should be put on standby during the cable laying operations in the advent that archaeological material is discovered during these works. This will help prevent potential delays to the project should archaeological material which needs to be dived be discovered. A dive/survey licence as issued by the relevant Minister.

Potential to impact directly or indirectly on listed or scenic views or protected landscapes as outlined in the County Development Plan

All works will be submarine and buried in the intertidal zone there is no potential to impact listed or scenic views or protected landscapes.

Significance of Impact According to Theme

Population and Human Health

There are no potential impacts arising from the proposed project which could lead to significant impacts on population or Human Health. There are no emissions, wastes or noise impacts associated with the proposed deployment, testing or decommissioning phases of the proposal.

Provided the requested conditions set out by the Marine Water Advisor in the prescribed body responses temporary effects on fishermen, navigation and recreational use of the beach during construction will arise but these are considered to be insignificant.

Biodiversity

The Screening for Appropriate Assessment submitted with the Foreshore application identified the zone of influence of the project and sensitive receptors within this zone. A total of 17 European sites were screened within this area. For each European site the potential for an interaction between the proposed installation and maintenance activities and the Qualifying Interest through a pressure-receptor pathway was considered. Where no interaction was identified sites and their constituent habitats and species were screened out. Where an interaction was identified the relevant sites were further assessed. Following the assessment of these sites it was concluded that: the proposed project does not have the potential to give rise to significant impacts on the overall integrity of the Natura 2000 sites considered.

The Screening for Appropriate Assessment considered Annex II fish species within the zone of influence of the proposed project and no potential for significant impacts were recorded. It is considered that the effects of the proposed project on additional fish species (other than Annex II species) would be similar to those considered for Annex II species and therefore no effect on fish is considered likely.

No additional habitats or species have been identified that could be potentially impacted by the proposed project. Therefore, no negative effects on biodiversity are considered likely.

Soils and Geology

Temporary disturbance of sediment in the intertidal and subtidal will occur but this disturbance will be short lived and insignificant.

Water

Modelling presented in Appendix H of the Planning Report submitted with the Foreshore application concluded that: Trenching operations will temporarily suspend sediments in the water column, changing water clarity and increasing turbidity:

- Within the nearshore area the medium graded sands noted by the cable route survey, are likely to be suspended into the water column from the installation tool but will settle back to the seabed in a worst case of 6 minutes during jetting activities in a spring tide (assuming current speeds of

0.605m s⁻¹) (Appendix H). In the worst-case sandy sediments will be dispersed up to 107m from the installation tool in a thin median veneer of less than 2.3mm.

- With increasing distance from the landing site, a greater percentage of silt is encountered within the sediments. Finer sediment particles remain suspended within the water column for longer (up to 28 hours) and will be dispersed over a greater median distance of 30km, in a median veneer of 0.003mm (Appendix H).

The Screening for Appropriate Assessment submitted with the Foreshore application notes that: The suspension of sediments within the water column from cable installation may cause a brief, localised increase in turbidity before being re-deposited on the seabed. A temporary reduction in the feeding capability of species relying on sight to locate their prey may occur. The changes will be within natural levels of variation experienced after storm events in the region. Most species are likely to be tolerant to brief changes in turbidity levels and the significance of the effect will be negligible.

Accidental risks to water quality have been controlled for by the use of vessels in compliance with MARPOL regulations.

No risks to water quality are therefore considered likely.

Air and Climate Change

The installation of a subsea fibre optic cable does not have the potential to lead to significant effects on air quality or contribute to climate change.

Noise & Vibration

Noise will be generated through the Main-lay vessel during the installation phase and through the use of plant machinery in the intertidal area during the landfall installation process. However, this will be of a short duration and not significantly high. Underwater noise modelling has been carried out and this indicates noise levels to marine mammals will be below the threshold for significant disturbance. Therefore, no significant noise or vibration effects are considered likely.

Landscape

All works will be submarine and buried in the intertidal zone there is no potential to impact the landscape

Material Assets

No use of material assets is required and no impact has been identified.

Cultural Heritage

No impact on cultural heritage including protected structures or archaeological features provided the conditions stipulated by the Underwater Marine Archaeology Unit, of the Department Culture Heritage and the Gaeltacht are adhered to.

Conclusions

It can be concluded that there will be no significant direct or indirect impacts by virtue of the scale and scope of the project relative to the receiving environment.

No sensitive receptors (habitats, species or the ecosystem services on which they depend) listed in any of the Annexes of the EU Habitats Directive, or which form a qualifying interest for European sites within the zone of influence of the proposed project, will be affected by the proposed development. The entire project will take place subtidally or in the intertidal area and will be buried to at least 1.5 meters. There will be no Habitat loss or fragmentation either inside or outside a European site. There is no evidence that the structure and function of any habitat or species will be impacted by the proposed project either during construction or operation.

No significant impacts on humans, air and climate, material assets or cultural heritage have been identified. Temporary noise and nuisance effects that may occur during the construction phase are considered to be minor and will be of a short duration.

Therefore, provided the conditions set out in the prescribed body response by the Marine Water Advisor, Department of Housing, Local Government and Heritage and the Archaeology section of the Department of Culture, Heritage and the Gaeltacht the project as proposed will have no significant effects on the environment.

2. Assessment of prescribed body consultation:

Prescribed bodies (environmental authorities) were notified directly by the Department of Housing, Local Government and Heritage of the proposed project and provided with all supporting documentation.

Submission/observations from these bodies received by the Department are published on the Departments website at: <https://www.housing.gov.ie/planning/foreshore/applications/celtix-connect-havhingsten-telecommunication-cable-dublin>

The applicant provided a full and detailed response to any queries raised by the prescribed bodies and this response is also published on the aforementioned website.

3. Assessment of public body consultation:

Public Consultation: An initial public consultation period ran from 21st August 2019 to 18th September 2019 (extended by the applicant to 27/09/2019). Ten (10) submissions were made from the public. However, due to discrepancies between the display documentation and application documents published on the Departments website, the public consultation period was deemed unsatisfactory and was repeated.

A second public consultation concerning this application was published in “Northside People East” and “The Irish Independent” newspapers from 29th January 2020 to 29th February 2020 (due to an error in the Northside People East notice this was re-published on 05th February 2020 – this was due to the Northside People East being published on 29th January 2020 with 30 calendar up to 28th February 2020 and the Irish Independent being published on 30th January 2020 for 30 calendar days to the 29th February 2020 – so in order to extend the Northside People East advertisement for 1 day to the 29th this was re-advertised on 05/02/2020 to say the closing date for submission was 29th February 2020). The relevant documents were on display at Balbriggan Garda Station, Drogheda Street, Balbriggan, Co. Dublin and were also available on the Department of Housing, Planning and Local Government’s website. The public consultation period ran from 29th January 2020 to 29th February 2020. Fifteen (15) submissions were made by the public.

Public observations relevant to the EU Habitats and EIA Directives are considered in table 3.1 below.

Table 3.1 Summary of public observations and response relevant to the EU Habitats and EIA Directives

No	Observations	Response
1	Public observations related to potential omissions related to archaeological heritage	These observations are considered to be addressed in the prescribed body consultation. No objections were made by the prescribed body, some recommended licence conditions were proposed.
2	Public observations related to potential future use of Loughshinny Harbour e.g., amenity use, issues related to future maintenance dredging and future development of the harbour.	These issues are relevant to impacts on Human beings considered in the environmental report. As the proposed project will lead to temporary short-term impacts at Loughshinny Harbour it is considered they will not have any significant, long term effects on the use of the harbour area or its future development.
3	Public observations related to the non-submission of a Natura Impact Statement (NIS).	<p>The project was screened out by the applicant in their Screening for Appropriate Assessment. Subsequently, it is the role of the Competent Authority to conduct an Appropriate Assessment Screening and in so doing make an Appropriate Assessment Screening determination.</p> <p>An NIS is not necessarily a requirement and only become so if a project identifies the potential for significant effects on the integrity of a European site.</p>
4	<p>Public observations related to in-combination effects including:</p> <ul style="list-style-type: none"> • 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. • Project-splitting • Transboundary effects 	<p>Cumulative impacts were addressed appropriately in so far as is reasonably practical by the applicant.</p> <p>With due consideration to the cable landing station, Screening for appropriate assessment for the project was carried out separately for the cable landing station. No source-path-receptor impacts have been identified between the currently proposed project and the cable landing station. Therefore, no in-combination effects are considered possible.</p> <p>It is considered that the proposed project does not amount to project-splitting. Case law (e.g., Judicial Review: 2015 No. 545) has concluded that the correct approach, in relation to project splitting, is to ascertain if project splitting has occurred for the purpose of avoiding the obligations to have an EIA. We can find no evidence that the construction of the cable landing station was subject to a separate planning application to avoid the requirement for an EIA. All documentation related to both the current project and the construction of the cable landing station was assessed as part of this environmental report. There is no evidence to suggest that had the two projects being assessed “as one” that a requirement for an EIA would have arisen.</p>

5	Public observations related to mitigation	<p>Mitigation is only required if significant effects on the qualifying interest of a European site have been identified. No mitigation has been proposed in the Screening for Appropriate Assessment.</p> <p>The embedded mitigation referenced in the Screening for Appropriate Assessment relates to legal obligations not designed to mitigate effects on European sites. They are not specifically targeting features of interest of any European sites.</p> <p>Following a request for further information by the technical expert acting on behalf of the Competent Authority, the applicant has made it clear that the CEMP is not intended to avoid or reduce harmful effects on a European site and provided the rationale for their reasoning. Therefore, it is accepted that no mitigation is proposed</p>
6	Public observations related to adequacy of the baseline data and information/ conclusions detailed in the Screening for Appropriate Assessment.	<p>An Appropriate Assessment Screening based on the information provided in the applicants Screening for Appropriate Assessment and other relevant information has been prepared by the competent authority. The public observations related to the adequacy or otherwise of the baseline data have been noted and considered in the Appropriate Assessment Screening.</p> <p>Following a request for further information by the technical expert acting on behalf of the Competent Authority related to the baseline data assessed for birds, the applicant has provided further clarity (use of I-Webs sub site data) and it is therefore considered that the adequacy of the baseline data was appropriate and proportionate to the scale and scope of the proposed project.</p>
7	Consideration of the reef features	<p>The reef feature, for which Rockabill to Dalkey Island SAC is designated, is primarily confined to the areas surrounding the islands and a section of the intertidal area at of Howth Head. Outcrops of reef, subtidal and intertidal, will likely be present in isolated areas throughout the remainder of this large site.</p> <p>Impacts as a result of the installation and operation phase of the proposed project on the reef habitat of the SAC would be highly unlikely. Sediment mobilisation as a result of the proposed project would be too short lived and not significantly above background levels to cause impacts to reef habitats. The proposed project represents a single disturbance event and would not lead to a continuous source of impact on reef habitats. No significant habitat loss would occur that would have the potential to significantly impact the conservation objectives of a European site.</p>

		It is considered the Screening for Appropriate Assessment has adequately assessed the potential for impact on reef habitats.
8	Consideration of the potential impact of the proposed development on National Conservation Sites (NHA and pNHA) and species protected under the Wildlife Acts and Flora Protection Order has not been addressed anywhere in the project submission.	<p>NHA's within the stated zone of influence of the proposed project are coincident with the boundaries of the SPA's in this area.</p> <p>The nearest pNHA (Loughshinny Coast) is 1.5km north of the proposed landfall location.</p> <p>Assessment of impacts on National Conservation Sites and species protected under the Wildlife Acts and Flora Protection Order outside of the European network of sites should be assessed under the EIA Directive if required.</p> <p>However, it should be noted the adjacent NHA designations are coincident with the boundaries of European sites in the area which have been addressed in the Screening for Appropriate Assessment. A pNHA, Loughshinny Coast, 1.5km to the north of the landfall does not fall under within additional nature conservation sites.</p>
9	Consideration of Annex II fish species	Annex II fish species were considered and Screened out at the Screening for appropriate assessment stage. All relevant species protected under national legislation have been considered. IFI recommended in the prescribed body consultation that cable laying should not take place in areas within 1 km of the shore in the period mid-May – mid June. The applicant responded that no work would occur during this period.
10	Consideration of Birds and SPA's	This issue is addressed in the Appropriate Assessment Screening prepared by the competent authority (see point 6 above) and has been adequately addressed by the applicant following an RFI. Consideration of birds and SPA's has been appropriately addressed.
11	Public observations related to EIS	No EIS has been submitted for this project. It is considered that the intent of a number of the public comments relevant to EIS were more likely intended to reflect issues related to the applicant Screening for Appropriate Assessment and as such these comments have been addressed elsewhere in this document or the Appropriate Assessment Screening prepared by the competent authority.