

**FS007138 ESB Celtic Offshore Wind.
Site Investigations for proposed Offshore Wind
Farm, off coast Cork and Waterford**

Public consultation

**(Under Section 19A of the Foreshore Act 1933, and Regulation 42(6) of the European
Communities (Birds and Natural Habitats) Regulations 2011)**

Held 6th March 2023 - 4th April 2023

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SUBMISSION 1

From: [REDACTED]@gmail.com>

Sent: Tuesday 4 April 2023 18:08

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: ESB Foreshore license site investigation works. Cork/Waterford coast . FS007138

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To whom it may concern,

I am deeply concerned that my livelihood will be adversely affected in the coming months and beyond due to the planned surveys under this application and subsequent investigation works. The conflict between the right to fish in coastal areas and the right to lay underwater cables and associated surveys, has become an increasingly contested matter over the recent decades, with growing implications for the livelihoods of local fishing communities, various industries, coastal regulators, and those operating in the environment. This impacts operations such as mine, small scale inshore fishers significantly, both during the construction phases, and subsequently, forever changing the fishing ground, affecting species behaviour often in a manner that will destroy the local fishery.

The survey area marked out in the document available for inspection is indicative of my fishing ground. The ground in question is a recognised commercially exploited place of work and I have concerns regarding over exposure and continual disturbance of stocks and potential to create intensive disruptions to the seabed; the impact of continued large scale investigations on the fish stocks; and concerns around possible impact of use of ultra-high resolution seismic survey on stocks are all valid worries I have about the future of fishing in the area.

I am an inshore fisherman who has fished these waters for over 25 years. I make my living in the Cork harbour area and beyond up to the 12-mile limit. My catch is seasonal, concentrating on potting for lobster, shrimp, and crab and using lines to catch mackerel, pollock, cod, ling and skate when in season. I fish sustainably and supply locally and this development directly threatens my livelihood and my work space and I would like to object to the current proposal under the following grounds:

1. Access: The planned survey causes disruption to the local fishing industry, especially in terms of access to the area. I am concerned about exclusion zones both during and after the survey, within and outside the harbour, limiting fishing grounds and access to the areas I pot in. I am concerned that I may find that my access to certain areas is restricted or excluded from them.
2. Demand for Local Catch: As the surveys are being conducted, this can limit access to certain fishing sites and resources, local demand for the catch will be reduced. I may be forced to seek alternative locations to fish that are further away, resulting in labour and transportation costs that can not only decrease the profit margin of my catch but also increase my hours of work.

3. Loss of Income: I ask you to consider the negative economic implications for fishers and their families should they not be able to go to work due to this development.

Trusting the balancing of rights will endure and careful consideration of the right to earn a living and the right to protect our environments from all harm, that all stakeholders viewpoints will be considered, including those who have used the area to earn a living for decades.

I look forward to hearing from you.

Kind Regards,



SUBMISSION 2

[REDACTED]
County Cork
4th April 2023
[REDACTED]

**To: Minister for Housing, Local Government and Heritage, Foreshore Section,
Department of Housing, Local Government and Heritage, Newtown Road,
Wexford, County Wexford**

E-Mail: foreshoreORE@housing.gov.ie

Ref No: FS007139

**Submission of [REDACTED] and Wild Ireland Defense, a
Company Limited by Guarantee**

Ref No: FS007138

**Regarding an APPLICATION FOR AN INVESTIGATIVE FORESHORE LICENCE
and FOR APPROPRIATE ASSESSMENT of ESB Wind Development Limited**

Made to: Minister of Housing, Local Government and Heritage for a Foreshore licence under Section 3 of the Foreshore Act 1933, as amended, to undertake marine site investigations to inform feasibility assessments and design relating to the Celtic Offshore Wind project to the south of County Cork and to the southwest of County Waterford.

The Celtic Offshore Wind project is comprised of two projects, one fixed and one floating. Celtic Offshore Wind is located to the south of county Cork and to the southwest of county Waterford.

The fixed project (Celtic One) is approximately 7.5 km from shore.

The export cable corridor for the floating project (Celtic 2) is the only aspect of the floating project that lies within the 12nm limit.

For the purposes of this application the application area includes Celtic One and the export cable corridor for Celtic 2.

Location: Off the Cork and Waterford coast

A Aire,

Ar my shon fein agus ar [REDACTED] agus Wild Ireland Defense clg, is mian liom an meid a leanas a chur in iul dhuit faoin Iarratas seo.

We believe and so submit that it is singularly impossible to conduct any form of Environmental Assessment in relation to this Project either in accordance with the Habitats Directive, the Birds Directive or the EIA Directive of the European Union without also considering all adjacent and overlapping Wind Energy Projects proposed and/or in respect of which Ministerial Consent is sought along the coastline between Old Head of Kinsale and Carnsore Point, regardless whether those Plans and/or Projects are sought to be consented to and implemented inside of the Baseline and within the Internal Waters of the State or whether those Plans and/or Projects are sought to be consented to and implemented outside of the Baseline within the Territorial Waters of the State, or otherwise.

On Page 45 of the Celtic Offshore Wind Site Investigation “non-statutory Environmental Report” we are told that the Projects listed in Table 8-1, running from page 46 – 48 and including Geophysical, Geotechnical, Archaeological, Ecological, Oceanographic, Meteorological and Environmental investigations that seek to acquire, amongst other information, baseline data to allow cable design and the development of cable installation methodologies, to acquire baseline data to optimise the wind farm layout design and finalise offshore foundation locations, to acquire baseline data on the wind resource and baseline information for environmental studies of the area (of proposed Wind-farm Installations and sub-sea Cabling to take Electricity derived from a significant number of Wind Energy Projects to Shore.

Meanwhile the Non-Statutory Environmental Report being a Report to Accompany Foreshore Licence Application for Site Investigation Works in a Submission to the Department of Housing, Local Government & Heritage, Document No.: QS-000316-01-R460-003-000 and dated August 2022, prepared by ESB Engineering & Major Projects, One Dublin Airport Central, Dublin Airport, Cloghran, Co. Dublin, Ireland advises the Consenting Authority and the Public that “*the proposed project impacts have been identified as highly localised and of temporary duration. It is therefore considered that cumulative impacts are likely to be minor.*”

Celtic Offshore Wind Site Investigation
Non-statutory Environmental Report

8 Cumulative Impacts

While a single development may not in itself cause a significant effect a combination of projects within an area may have a negative impact on a site cumulatively. Therefore, the cumulative impacts of a project in association with other projects and plans must be taken into consideration when assessing the possible impacts of a project.

Projects listed in **Table 8-1** have the potential to cause similar effects on the identified sensitive receptors associated with the proposed site investigations.

It is recognised that noise associated with the proposed SIs may impact identified species groups either alone or possibly in-combination with similar SIs if being conducted at the same time. However should identified 3rd party SI activities temporally overlap with the proposed SI works at Celtic, the proposed project impacts have been identified as highly localised and of temporary duration. It is therefore considered that cumulative impacts are likely to be minor.

Meanwhile on Page 50 of that Non-Statutory Environmental Report we are advised that ESB Engineering & Major Projects, on behalf of the ESB Wind Development Limited, have concluded that the works envisaged and as described in the Application when taken “*alone and cumulatively with other proposed projects are not anticipated to result in any significant effects on the environment and are both short term and temporary in nature.*”

10 Conclusion

As outlined by this document, site investigations are proposed to be undertaken pertaining to the Celtic Offshore Wind site commencing in 2022 subject to the grant of this Foreshore Licence application.

As described herein these SI works alone and cumulatively with other proposed projects are not anticipated to result in any significant effects on the environment and are both short term and temporary in nature.

The ultimate project, the wind farm, will be the subject of a full consent application in due course and is outside the scope of this application. This initial stage in the overall development process is focused on the undertaking of SI works only in order to inform ongoing feasibility assessments for the development, the overall design of the wind farm and to inform the completion of an EIAR and NIS to accompany any future project consent application.

With all due respects to the Applicant and to ESB Engineering & Major Projects, we submit that this cannot possibly be a correct assumption to have made having regard to the content of the Applicant's own "SCREENING FOR APPROPRIATE ASSESSMENT REPORT" - Application No. FS007138 dated the 29th November 2022 where on Page 29, following on a recitation in a number of preceding paragraphs that the possibility of likely significant effects as a result of the proposed project within the Zone of Influence of the proposed Project **cannot be excluded**.

We are then advised at Paragraph 3.4.3 on "In-combination effects" that in a search of the Department's Foreshore applications web site on the 11th of November 2022, a number of Foreshore applications were identified which may have potential to have in-combination effects with the proposed project (table 7).

Of identified projects only those which have a temporal overlap with the proposed project are likely to have in-combination effects. Such effects, depending on the project, are likely to include all or some of the following effects - above water noise disturbance, under water noise disturbance and visual disturbance.

With all due respects to the Applicant, it cannot possibly be the case that **only proposed Wind Energy Projects which have a temporal overlap** with the proposed (ESB) Project **are likely to have in-combination effects**. Having regard to the fact that the Site of the proposed Project and the Site of the proposed Geophysical and Geotechnical Investigations lies directly in the migratory path of a number of species, including highly protected species of, for example, Whales, Dolphin and other species that are so protected in accordance with the EU's Habitats and Birds Directives and, having regard to the fact that by the ESB's own admission, a significant number of Fish Species will have their Nursery and Spawning habits and Habitats significantly interfered with as a result of the 'works' proposed by the ESB and by 'works' proposed to be conducted by a number of other Wind Energy Companies along the coast of Counties Cork, Waterford and Wexford, it is patently the case that no proper Assessment can be performed absent consideration of the "in combination affects" between the ESB Project and the Projects listed in the following paragraphs.

The paragraphs to which we refer above are then recite as follows:

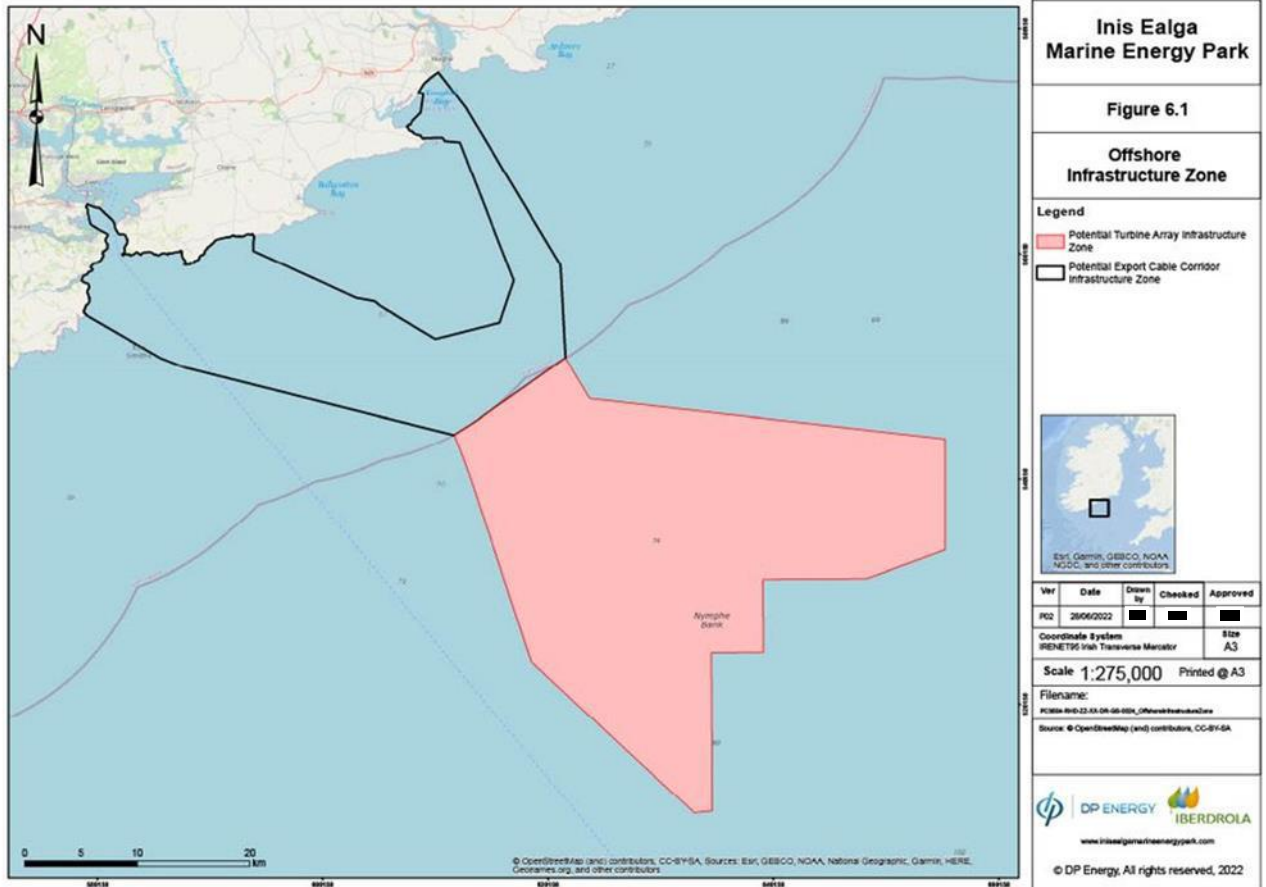
As stated in Section 1.1 ESB Wind Development Ltd. propose to carry out site investigations in an adjacent area identified for future floating offshore wind in the Celtic Two project. The applicant's Supporting Information Screening for Appropriate Assessment report (SISSA) states that their screening for Appropriate Assessment includes the Celtic Two area, however as this area is outside the foreshore licence jurisdiction no details of the proposed site investigation have been provided to the Department and as such this Screening for Appropriate Assessment only takes account of the Celtic One Site investigations. The Celtic Two project and associated site investigations are considered to have in-combination effects if they overlap temporally.

Based on insufficient clarity on when the survey/works will be carried out and using the precautionary principle **the following projects are considered to have in-combination effects with the proposed project:**

- Site Investigations for ESB Celtic Two – offshore floating wind project adjacent to, but outside 12nm limit, of this application (FS007138).
- FS007354 Kinsale Offshore Wind Ltd., site Investigations for offshore wind.
- FS006916 EirGrid Celtic Interconnector Electricity Cable.
- FS007404 Inis Ealga Marine Energy Park (IEMEP) site investigations for offshore wind.
- FS007139 Simply Blue Emerald Site Investigations for site Investigations for offshore wind.

Here below is a Drawing showing an overlapping Development proposed by Inis Ealga Marine Energy Park where, as we understand the position, the Developers intent to embark on a significant number of Geophysical and Geotechnical Investigations of the Sea-floor throughout the area marked on the map below, both inside of and beyond the Baseline.

For example <https://www.offshorewind.biz/2022/07/14/dp-energy-iberdrola-launch-eiar-consultation-for-another-1-gw-irish-project/>



We submit that it is **IMPOSSIBLE** to conduct any form of Appropriate Assessment of the Environmental effects of all of these Projects unless and until a Cumulative Assessment is conducted on **ALL** Projects that are proposed and whereby the Environmental Impacts of all Projects are assessed together.

We believe and so submit that failure to conduct an Assessment of all such Plans and Projects together with the cumulative impacts of all such Projects being assessed both on their own and in combination with each other and both in waters within the Baseline, in the Internal Waters of the State and in waters outside of and without the Baseline in the Exclusive Economic Zone and Exclusive Fishery Limits of the State represents an abject failure to comply with the requirements of both Habitats and Birds Directives of the EU and Article 6.3 and the Caselaw governing application of Article 6.3 and 6.4 of the ECJ.

Yours faithfully,

████████████████████

SUBMISSION 3

From: [REDACTED]@hotmail.com>

Sent: Tuesday 4 April 2023 16:14

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: ESB foreshore license site investigation works. Cork/Waterford coast . FS007138

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To whom it may concern

This application is made by a family of fishermen that have worked the area concerned for many years.

We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.

This stretch of coastline has, and continues to provided livelihoods, employment , as well as top quality , low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.

The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.

This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors .

I personally fish crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.

Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.

Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.

Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.

Yours sincerely

[REDACTED]

Co cork

SUBMISSION 4

From: [REDACTED]@gmail.com>

Sent: Tuesday 4 April 2023 17:49

To: Housing Foreshore <foreshore@housing.gov.ie>

Subject: ESB foreshore license site investigation works. Cork/Waterford coast . FS007138

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ESB foreshore license site investigation works. Cork/Waterford coast . FS007138

>> To whom it may concern

>> This application is made by a family of fishermen that have worked the area concerned for many years.

>>

>> We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunrecht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.

>>

>> This stretch of coastline has, and continues to provided livelihoods, employment , as well as top quality , low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.

>>

>> The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.

>>

>> This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors .

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>> I personally fish crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.

>>

>> Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.

>>

>> Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.

>>

>> Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the ORE sector.

Mise le meas

[REDACTED]

Co Cork

SUBMISSION 5

-----Original Message-----

From: [REDACTED]@hotmail.com>

Sent: Monday 3 April 2023 20:44

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>; [REDACTED]@gmail.com

Subject: ESB foreshore license site investigation works. Cork/Waterford coast . FS007138

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To whom it may concern

This application is made by a family of fishermen that have worked the area concerned for many years.

We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.

This stretch of coastline has, and continues to provide livelihoods, employment, as well as top quality, low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.

The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well as all other members of the fishing community's on the south coast. These effects which are detrimental to the health of fish/shellfish stocks are well documented.

This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors.

I personally fish in excess of 1500 crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.

Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.

Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.

Any decision/ license granted should not come at a total cost or risk of losing many years of hard work building a business for the total gain / profit of the applicant.

Yours sincerely

[REDACTED]
Director. O Donovan seafoods
[REDACTED]

SUBMISSION 6

From: [REDACTED]@gmail.com>

Sent: Monday 3 April 2023 20:47

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Fwd: ESB foreshore license site investigation works. Cork/Waterford coast . FS007138

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To whom it may concern

This application is made by a family of fishermen that have worked the area concerned for many years.

We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.

This stretch of coastline has, and continues to provided livelihoods, employment , as well as top quality , low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.

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Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.

Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.

Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.

Yours sincerely

[REDACTED]

Director. O Donovan seafoods

[REDACTED]

O'Donovan Seafoods

Phone: [REDACTED]

E-Mail: [REDACTED][@gmail.com](mailto:[REDACTED]@gmail.com)

SUBMISSION 7

Dear [REDACTED]

I wish to acknowledge receipt of this submission.

Regards,
Foreshore Unit

From: [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>

Sent: Tuesday 4 April 2023 21:17

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Fwd:Esb foreshore lincense site investigation works.cork/Waterford coast.Fs007138

One attachment received with this submission, please see next page

04.04.2023

ESB foreshore license site investigation works
Cork / Waterford Coast.

REF N^o : FS00 7136

To whom it concerns,

With regard to the above applicant,
I wish to make an objection for the following reasons.
I hope you take them into consideration.


I am an inshore fisherman from Cork Harbour, for over 25 years. The planned survey area, as marked out in the document available for inspection, is where my main fishing grounds are.

I fish for shrimp in the winter months and for whitefish and shellfish during the spring - summer months. I am also licensed to fish for salmon in the inner harbour area.

This survey is located in an area of key importance, including spring spawning grounds for whitefish, lobster and shrimp. These species make up my main source of income.

The planned survey will cause disruption to the local fishing industry, especially in terms of access. I am very concerned that my access to said area would be restricted, or maybe excluded from these fishing grounds. This in turn will have a negative economic implication for me - ie loss of income,

Thank you,
Kind regards


MFV "Muir Link"