

**FS007161 Fuinneamh Sceirde Teoranta - Site  
Investigations for the proposed Sceirde  
Rocks Offshore Wind Farm**

**Repeat Public  
Consultation**

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

**Public Submission 1**

**From:** [REDACTED] >

**Sent:** Monday 8 May 2023 21:54

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

**Subject:** proposed Sceirde Rocks Offshore Wind Farm

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Dear sirs

As an Irish citizen and Failte Ireland tour guide I would like to object in the strongest terms to the proposed offshore wind farm at Sceirde Rocks, on the grounds of despoiling our precious natural heritage.

I have no other conflicting interest in the scheme and am happy to be contacted for confirmation.

Yours sincerely

[REDACTED]

## Public Submission 2

**From:** [REDACTED] >  
**Sent:** Tuesday 28 February 2023 13:18  
**To:** Housing ForeShoreORE <[foreshoreORE@housing.gov.ie](mailto:foreshoreORE@housing.gov.ie)>  
**Subject:**

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To whom it may concern,

The following is merely observations I have made from reading the Existing Environment report regarding the site in question.

From reading the Benthic Habitats and Communities report about the area in question I find it difficult to believe that the capacity of the knowledge about this area is based on a divers survey and is contained within one short sentence. In essence the diver survey in 2005 does not seem sufficient in any way to allow for extensive and quite possibly destructive drilling within that area. The language regarding the possible vulnerability to spawning nephros is vague, stating it **may** interfere with them yet the report guides us back to 3.2 stating that they may not spawn there due to the sediment type. This language seems bias seeing that the knowledge of the seabed is based on four lines that depict the entire survey findings. It is obvious that there aren't enough facts known about this area and the ecosystem and habitats there in. It is quite a unique rock formation with the varying depths that isn't replicated in many instances on Irelands coast. The desperation for Ireland to reach European targets for green energy seems to have blinkered the government down these paths. Consideration to alternatives to fixed offshore windfarms surely should be brought to mind to ensure irreparable damage to sea bed habitats and eco systems.

Kind regards

[REDACTED]

Sent from [Mail](#) for Windows 10

### Public Submission 3

**From:** [REDACTED]  
**Sent:** Sunday 14 May 2023 21:41  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** FS007161

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A Chara,

Maidir le ceantar Carraigí na Sceirde - is ceantar mara fíor thábhachtach é. Ba chóir ceantar caoimhnaithe mara a dhéanamh as. Níl sé feilliúnach do forbairt agus ba chóir stop iomlán a cuir le iascaireacht ar nós tráiléarachta sa gceantar mara seo.

Le meas

[REDACTED]

Sent from my HUAWEI P20 lite on Three

A Chara,

In relation to the area of Sceirde Rocks - it is a very important coastal area. It should be made a Marine Protected Area. It is not suitable for development and trawling fishing should be completely stopped in this area.

Le meas

[REDACTED]

Sent from my HUAWEI P20 lite on Three

#### Public Submission 4

**From:** Mail Security Service

**Sent:** Tuesday 16 May 2023 08:30

**To:** [forshore@housing.gov.ie](mailto:forshore@housing.gov.ie) <[forshore@housing.gov.ie](mailto:forshore@housing.gov.ie)>

**Subject:** ref application for forshore licence at sceirde rocks windfarm project

ref application for foreshore licence.  
sceirde rocks windfarm project.

we operate a sea angling charter boats out off roundstone for over 30 years.  
most off our fishing is done within the area the foreshore licence is been applied for.

,1 the foreshore licence lies within the spawning grounds for most species off fish

we are worried that the survey methods used .

Bore hole sampling and shallow sampling will have a huge negative effect on fishing .

as the fish will move off ground and result in a big loss off income over the  
next few years.for our buisness.

the wind turbines will also be a visual intrusion on the land scape at sreirde rocks.

as we also do sight seeing and dolphin seal watching trips as there are a big number  
off seals on sceirde rocks .

[REDACTED]  
[REDACTED]  
roundstone .  
county galway .

p.s could you please confirm you have recieved email by return .,  
thank you [REDACTED]

.  
16 may 2023

## Public Submission 5

**From:** [REDACTED]  
**Sent:** Friday 26 May 2023 12:15  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** FS007161 application - objection

RE. FS007161 application (windfarm Connemara)

To Whom it May Concern,

I would like to open with the findings of a review taken by the University of Delaware concerning the recommended distance windfarms should be from the shore. The article heading, which says it all, is as follows: 'For U.S. Offshore Wind Farms, Sweet Spot Is 15 Miles from Beach'. And in the text the authors ask themselves the question: 'How close would an offshore wind turbine have to be to ruin your day at the beach? The consensus is fewer than 15 miles (24 kilometers), ...'  
(<https://news.bloomberglaw.com/environment-and-energy/for-u-s-offshore-wind-farms-sweet-spot-is-15-miles-from-beach>).

The proposed windfarm and development is 5 km from one of the most spectacular coastlines in Ireland, which is a fifth of the 24km 'sweet spot' recommended, above. This 5km measure is in itself not even accurate, as the applicants measure from 5km from what they term 'the mainland coast at its closest point'. Between this, so called, 'mainland' and the windfarm lies Macdara's island. This island contains one of Ireland's most significant national monuments, which is an important destination for archaeologists, local people following the ancient custom of 'blessing boats' and for tourists. Consequently, I would argue that this makes the proposal less than 3 km from a highly relevant foreshore.

In regard to the location, I would like to direct your attention to another article 'Offshore Wind Turbine Visibility and Visual Impact Threshold Distances' by Robert G. Sullivan, Leslie B. Kirchler, Jackson Cothren, Snow L. Winters, published in Environmental Practice 2012 (doi:10.1017/S1466046612000464)  
([https://blmwyomingvisual.anl.gov/docs/EnvPractice\\_Offshore%20Wind%20Turbine%20Visibility%20and%20Visual%20Impact%20Threshold%20Distances.pdf](https://blmwyomingvisual.anl.gov/docs/EnvPractice_Offshore%20Wind%20Turbine%20Visibility%20and%20Visual%20Impact%20Threshold%20Distances.pdf)).

They open with a literature review, in which they refer to a Scottish Natural Heritage Commission's assessment of the visual sensitivity of the Scottish seascape, as follows:

'As part of this review, the authors suggested that if a wind facility were sited 0–8 km (0–5 mi) from shore, a high visual impact would occur; at 8–13 km (5–8 mi), 13–24 km (8.1–14.9 mi), and more than 24 km (14.9 mi) visual impacts would be moderate, low, and insignificant, respectively.' (p. 3).

This means that the proposed application is well within the 'high visual impact', even if the 5km measure is accepted as valid, and at the extreme end of this 'high impact', if the 3km Macdara's island measure is taken as appropriate.

Sullivan and Kirchler then follow with their own research based upon existing windfarms. They find, as follows:

'This preliminary study has clearly shown that even small offshore wind facilities of a few dozen turbines can be seen easily at distances exceeding 25 km (15 mi) and that moderately sized facilities of 100 turbines are seen easily at distances of 35 km (22 mi) or even farther, in a variety of weather and lighting conditions. At distances of 14 km (9 mi) or less, even isolated, small facilities will likely be a major focus of visual attention in seaward views, again in a variety of weather and lighting conditions.' (p.14)

Note that they state that even a ‘small facility’ will be a ‘major focus of attention’ at less than 14km. The proposed wind farm is not a ‘small facility’, it is an extremely large facility, as it has exceptionally tall turbines and many of them. Furthermore, at 5km it is nearly a third less than the 14km distance, and at 3 km it is nearly a fifth of the 14 km.


Sullivan and Kirchler conclude their article as follows:

‘It is essential to our national and global well-being to move toward less carbon-intensive energy sources, including offshore wind resources. Doing so in the most environmentally and socially responsible manner is also essential, if for no other reason than that failure to do so will invariably result in strong opposition from parties having an interest in or commitment to protecting potentially affected resources. Large-scale deployment of offshore wind facilities will involve major changes to the visual qualities of seascapes, from treasured views at national seashores and at historic and tribal properties to the everyday sea views of residents and visitors in coastal communities. Complete, accurate knowledge of the potential impacts to the nations’ coastal visual resources is essential to achieving important national energy goals while fully considering ways to minimize potential environmental and social impacts.’ (p. 15).

Given this consensus of opinion concerning best practice, the proposed windfarm, cannot be construed as a development that is taking place in an ‘environmentally and socially responsible manner’. Please note, in context of the above quotation, that Macdara’s island certainly qualifies as a ‘historic’ landscape, and is only 3km away - a fraction of the 14km. While offshore windfarms are absolutely to be supported, this particular project is totally at variance with best practice. This is concerning given that the proposed windfarm includes particularly tall turbines and that Connemara is one of Ireland’s most beautiful, treasured and historically important landscapes.

In conclusion, given that the testing site is totally at variance with best practice principles concerning the building of offshore windfarms, this application should proceed no further. If this goes ahead, future generations will lament this destruction of one of Ireland’s finest landscapes. It is the job of planners to protect Ireland’s heritage and I would ask you to do so by rejecting this application.

All the best

  
(Kinvarra, Co Galway)

**Public Submission 6**

**From:** [REDACTED]  
**Sent:** Friday 26 May 2023 12:23  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** FS007161 (application for foreshore licence)

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To whom it may concern:

I urge a refusal of a foreshore license for exploration relating to the proposed Sceirde rocks wind farm FS007161 as I believe this project to be fundamentally flawed: the current proposal aims to site the development too close to the south Connemara shoreline - a mere 5 km from the mainland and scarcely 3 km from Oilean Mac Dara, with its medieval church which is a National Monument. As well as impacting the natural coastal environment, if allowed to proceed such a development would have a major visual impact on the area.

Best international practice requires a minimum distance of at least 14 kms offshore. While it is clear that power generation from wind energy is essential to meet future requirements, care must be taken over the siting of such a major infrastructural development. It is unacceptable to cause irreparable damage to our existing natural environment and cultural heritage in an effort to supply our energy needs. Siting this infrastructure at least 20 kms offshore would allow the infrastructural development to proceed without impinging on our inshore marine habitat as well as protecting our valuable cultural heritage. Thus all interests are protected.

Please reject this current application.

Yours faithfully,

[REDACTED]

[REDACTED]

Kinvara

Co. Galway [REDACTED]



**Public Submission 7**

**From:** [REDACTED]  
**Sent:** Tuesday 30 May 2023 08:47  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** Fuinneamh- Sceirde-Teoranta - FS007161.

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**The Minister for Housing, Local Government and Heritage**  
**Foreshore Section**  
**Department for Housing, Local Government and Heritage**  
**Newtown Road**  
**Wexford**  
**Co Wexford.**

**[foreshoreORE@housing.gov.ie](mailto:foreshoreORE@housing.gov.ie)**

29<sup>th</sup> May, 2023

**Re: Fuinneamh-Sceirde-Teoranta-site-investigations-for-the-proposed-Sceirde-Rocks Offshore-Wind-Farm. Repeat Consultation.**

**Dear Sir,**

As with so many other people who are living in Co Galway I have become very aware of the many issues facing this country when dealing with the negative

impact Global Climate Change is having on Ireland, as well as in many other countries around the world which today increasingly suffer from either drought or flooding events that are killing people and destroying natural environments.

Apart from the individual responsibilities we must all accept and share when trying to reduce our personal carbon emissions such as are contributing to increasing environmental impacts, we must support government that is adopting policies to reduce our unsustainable use of fossil fuels that currently feed the growing need for clean electrical energy.

These increasing energy demands are caused by modern business storing vast amounts of data, along with unsustainable commercial growth in public demands, such as conversion to electric home heating, electric powered public transport and private EV charging etc, all increase the demands for production of clean energy!

Today it comes to the growth in commercially driven and very profitable for some wind and solar farms. We are I believe approaching a stage where suitable available lands are becoming scarce. Big business is now also looking to increase their shareholder profits, by going offshore.

But I don't like these steel, concrete and composite fibre bladed machines that are marching ever deeper into our precious hilly special places, such as are now appearing in Connemara!

### **Offshore locations:**

The experience we have had so far in Ireland has been limited to just the one small offshore wind farm – a 25MW (megawatt) offshore wind farm generating electrical power in the Wicklow region – it was constructed under the old foreshore regime prior to the enactment of the new Maritime Area Planning Act.

Off shore locations suitable for future development are scarce and must be chosen carefully and in this case, despite years of speculation I am still finding that I must continue to oppose this choice of site for the following reasons:

If Application **FS007161** is granted, allowing a subsequent application for planning permission to proceed this government will rightly be accused of green-washing by promoting it's 'fast-tracking' of wind-generated energy production for Ireland while disregarding the significant negative environmental consequences on the local seabed, endangering the marine life that inhabits it and destroying the coastal landscape the fishing and tourism that sustain this pristine section of Connemaras coastline along Ireland's diminishing 'Wild Atlantic Way'.

As I say this in my opening lines, the government is right to encourage production green energy but while wind and solar farms are seen by many as necessary for Ireland to meet its green energy targets. The benefits of wind farms to the climate and environment have been falsely advertised and sold to convince people they do no harm are being overblown? Offshore wind technology, or inshore as is the case here, is not very green when 'whole of life' is considered. Wind generation faces considerable engineering challenges when compared with onshore plant.

Blades and gearboxes that are designed for a lifetime of 20 to 25 years I believe will need to be changed or replaced every 10 years. Blades will also degrade and need changing also, as their leading edges wear out become unbalanced causing excessive wear on gearboxes. The west coast weather that is expected to see stronger storms will cause unsustainable wear increasing the costs of replacing these machines.

## **MPA's**

It would seem that this government have again put a cart before the horse when promoting commercial expansion of Offshore Wind Energy development, before the long proposed expansion of Marine Protected Areas, one of which is being proposed for this very location Galway Bay? Environmentalists have been critical of the priority given to establish maritime area planning legislation, primarily designed for expansion of offshore renewable energy projects, in contrast to the long timelines for legislation to establish protection of our most important MPAs.

In the 'sleight-of-hand' rush to announce the establishment of MARA, (on May 17<sup>th</sup>), the Maritime Area Regulatory Authority (MARA) will not be established to begin its work until the 17th July 2023. Minister O'Brien at this press launch clearly forgot to mention that MARA will also be held as the body responsible to set up MPA's. This was not mentioned in his rush to make his announcement.

MARA it is said, "*marks the transition to the new maritime consenting regime*" and will be a key enabler in respect of Ireland's ambitions for the Offshore Renewable Energy sector, saying nothing about coastal protection. The new agency will have responsibility for assessing applications for Maritime Area Consents (MACs) which will be required before developers of offshore wind and other projects in the maritime area can make their planning applications.

It will also be responsible for granting licences for certain activities in the maritime area". Not one line about MPA's appeared to be uttered when reporting the launch of MARA?

The protection of our marine natural environments is clearly to be held in second place to the massive commercial exploitation of our coastal resources?

Here, I am reminded of the comment made by the CE of one of the UK's largest private water companies, as he informed shareholders collected together at an AGM that their company had successfully concluded the take-over of another competitor, which secured for them just "*another income stream!*" It's all about company profit!

## **Machine size:**

However, because of their enormous size and nearly constant movement, wind farms also have detrimental consequences of significant visual and acoustic impact and pose significant disruption to their local environments, wildlife and

surrounding communities. We have all been affected by these negative attributes of wind farms, as they have been erected so far on lands all around Ireland.

Because of the vast size of these large wind turbines at Sceirde and their effects on the environment and communities, the Irish government should hold wind farm developers/companies to the highest standards of transparency, engagement and protection of Irish land and marine environments and communities!

The wind farm development being proposed in **Application FS007161** is huge with 30 x 15MW turbines = 450 MW, with its fixed bottom and nearshore (nearest offshore turbine located just 5km from shore). The 2008 Environmental Impact Assessment by FST for the much smaller Sceirdre Rocks Wind Farm specified a total 20 x 5MW turbines = 100 MW.

This current application (**FS007161**) specifies a wind farm that is expected to produce over 4 times the power and requiring many more turbines are nearly twice the size of those as are specified in the 2008 application.

Given the vast size of this proposed offshore wind farm, it is crucial that should consents be confirmed and planning permissions given, that the government must ensure **a)** that Ireland's environment, habitats, marine life, landscapes and communities are not damaged and **b)** that the wind farm developers/owners are held to the highest levels of rigorous disclosure and transparency.

### **Another submission separately made also in opposition, asks a question:**

Is Macquarie's Green Investment Group (GIG) the best company with which to entrust an industrial project of this scale? Fuinneamh Sceirde Teoranta (FST) and its manager's Corio Generation are owned by Macquarie's Green Investment Group (International investment bank Macquarie buys Irish offshore wind farm development ([irishexaminer.com](http://irishexaminer.com)). Macquarie Group it is claimed have a poor track record in terms of financial management, maintenance of infrastructure, and protection of the environment.

"How Macquarie bank left Thames Water with extra £2bn debt – as reported by BBC News. Macquarie's Green Investment Group (GIG) includes independent trustees, as part of the sale to Macquarie group by the UK Government. In their most recent annual letter (Letter from the GPC ([greeninvestmentgroup.com](http://greeninvestmentgroup.com))) these same independent trustees highlighted concerns with regard to GIG's risk and opportunity management:

*"The identification, assessment and management of ESG (Environmental, Social and Governance) risks is core to GIG's principles and policies and to the Green Governance Framework."*

This case should include the methods to assess and mitigate risk, and to safely realise opportunities. Drilling 60 boreholes into the seabed in an important marine area cannot be without impact – is this really the type of actor we wish to have involved?

How can any of the documents associated with the foreshore licence application be taken at face value, if the independent trustees tasked with ensuring that GIG

delivers truly impactful and effective, green infrastructure projects in the UK?  
Are we here highlighting a lack of transparency across multiple key areas of GIG's work?

### **Negative impacts on nearby cultural and heritage sites:**

At this site, questions must be asked about how it is it appropriate or suitable place to build such a massive array of large machinery less than 5km from key cultural and natural heritage sites, such as the 6th century church on Oilean MhicDara and nearby Oilean Masún.

What impact will the turbines have on hugely important community events such as Feile Mhic Dara? Is this government risking damage to one of Ireland's most pristine coastal environments if the proposed Sceirde Rocks Wind Farm is allowed to be built this close?

The application states, the survey area is not subject to high levels off boat traffic. Yes the fishermen based in this area generally do operate boats of less than 12m. There is no other significant industrial activity in this area. As a result, the water, air and shoreline are currently clear of pollution while fishermen that do operate in this area are likely to suffer huge losses to their livelihoods if seas do become polluted, are not being compensated I understand.

The Mace Head Weather Station is located here for the reason that it consistently reports the cleanest air qualities in Europe. Mace Head Weather Station is one of 6 important international weather stations supplying crucial data in global research of climate change. Mace Head station *"has been measuring greenhouse gases since 1978 under the Advanced Global Atmospheric Gases Experiment (AGAGE). AGAGE is part of the powerful global observing system that is measuring greenhouse gases in the earth's atmosphere"* (RTE News, 10/03/2020).

If the proposed Sceirde Rocks Wind Farm is allowed to proceed, Mace Head Weather Station will probably have to move, as they have said that air flow readings will be affected by the wind farm and air quality readings will be affected by the construction phase as well as by the finished wind farm itself due to continual atmospheric dispersal of anti-corrosion materials used on the turbines.

The Environmental Assessment and EIA Screening Report has not assessed potential socio-economic impacts of the survey works. This area of West Connemara is an essential coastline element of Failtes *'Wild Atlantic Way'* is susceptible to damage, and to further decline in tourism numbers during survey periods and on construction, should this project proceed?

### **Damage to Seaweed Growth and supporting industry:**

Friends have carefully read the documentation detailing the planned site investigations and in particular the 'Natura Impact Statement' and the associated 'SCREENING FOR APPROPRIATE ASSESSMENT REPORT'. Despite the apparently thorough review of the potential impact of the proposed site

investigations for this significant offshore area (141 km<sup>2</sup>) of south-west Connemara.

I was concerned to note no formal assessment of the potential impact of the proposed works to the extensive macroalgal communities - specifically kelp - likely to be present in this extensive area, and in particular to the potential irreversible damage to the extended marine ecosystems that depend on these 'anchor' marine communities. I was also surprised to see no mention of the climate change and carbon impact assessment of these proposed works - nor indeed the subsequent construction and operation of these enormous facilities. The harvesting of seaweed is an industry growing in its importance for the local community, would be put at risk?

Reports together explicitly assess the impact of the proposed, similar, Scottish Caithness development in the context of releasing existing sequestered carbon in the sedimentary environment, and the potential for damage to the local kelp bed ecosystem.

Based on a thorough prior survey of the Pentland Floating Offshore Wind Farm site, it is noted the presence of such extensive kelp forest communities. Stating that these kelp beds are 'a key blue carbon habitat' and 'a high-value receptor and are assessed as being highly sensitive to changes in habitat', the report notes that the developers 'will endeavour to microsite around sensitive habitats, such as kelp beds, wherever possible, to minimise any disturbance or loss' and provide evidence-based basis for the regulatory authorities to proceed with its development.

No such due diligence exists for the Sceirde Rocks Offshore Wind Farm. No assessment of the impact of the planned works on already sequestered carbon in this enormous marine area is, so far as I can determine, is being proposed. No survey of the wider benthic ecology of the site is planned where the full extent of the presence and extent of the kelp beds within the wind farm zone can be determined, and so a formal assessment of the impact of the planned works on their vitality should be made, nor of the potential destruction of one of the most effective and entirely natural carbon sequestration resources we actually possess in abundance off the Irish coast.

In-law family members of my own daughters partner, have long been engaged in small farming and traditional weed cutting for generations just along the coast in Ballyconneelly. It is therefore no exaggeration to my claim that damage to this vital local industry is quite possible.

Therefore I would invite to you to request that the Minister be mindful of this deficiency in the existing environmental assessments of the Sceirde Rocks Offshore Wind Farm to date. My concern is the potential irreparable damage that could happen to this marine environment, ecologically and also in terms of carbon sequestration.

It is not beyond the bounds of possibility that the proposed facility could be exposed to legal jeopardy in the future on account of this without the sort of scrutiny one can see implemented by our neighbours in Scotland for the Pentland Floating Offshore Wind Farm.

On the basis of all the doubts I have expressed here about this project and in view of the damage it could cause in the local environments, I must confirm my absolute objection to the proposed construction of any large wind turbines at the Sceirde Rocks.

Yours sincerely

[Redacted signature]

Galway.

[Redacted address line]

[Redacted address line]

## Public Submission 8

**From:** [REDACTED]

**Sent:** Tuesday 30 May 2023 18:28

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

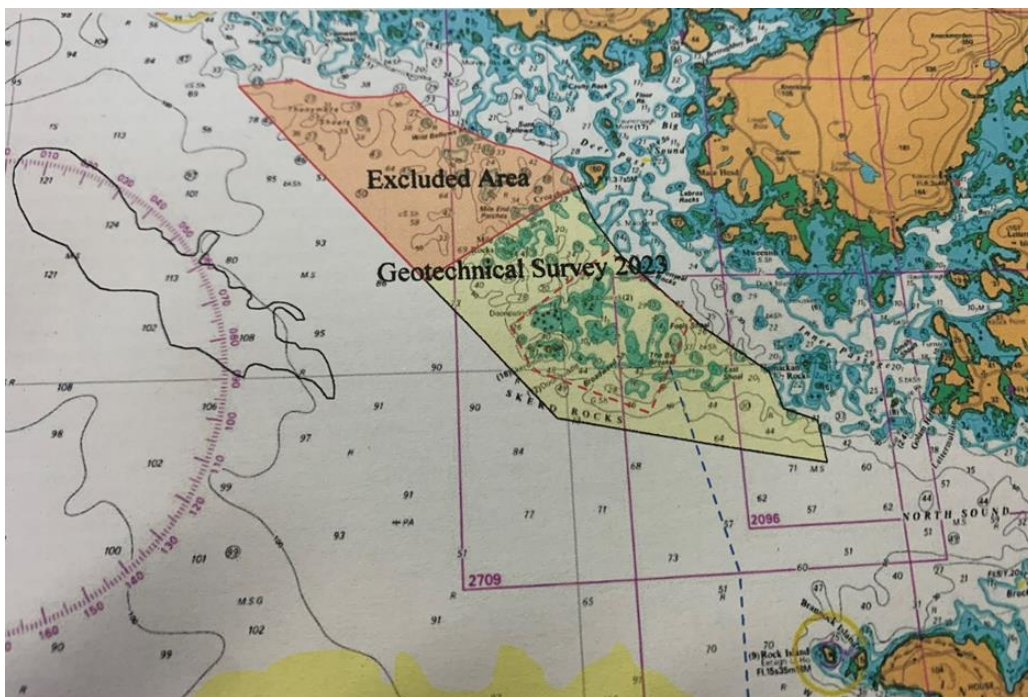
**Subject:** FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

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A chara,

I am a resident of Oileán Muighinis and I am writing to state my objections to foreshore licence application FS007161 for site investigations for the proposed Sceirde Rocks Offshore Wind Farm.

- The applicant has stated in response to submissions querying the size of the survey area that “the reason for the wider survey area requested is to enable data to be collected outwith the relevant project boundary that will still support project design and future EIA workstreams. It is important when developing and designing a project to have data on the environment in the area surrounding the project. In addition the FSL survey area was submitted before the MAC for the project had been confirmed”. Representatives for the applicant shared on 8 February 2023 that the site layout map provided with the foreshore licence application did not correctly show the proposed survey area. We were presented with the following and told that this was the correct site layout map:



If this is the case, why would the applicant a) not update the site layout map when the natura impact statement was updated, and b) not make reference to this in response to submissions querying the extent of the survey area? The apparent inability of the applicant to provide a coherent overview of the survey extents is quite worrying. It would be inappropriate for the foreshore licence to be awarded without clarity on this. It is noted that the foreshore licence application by the same applicant for



survey work along the proposed cable corridor describes this foreshore licence application as the “Sceirde Rocks OWF array area foreshore licence application (FS007161)”. Is the area presented in the site layout map the applicant’s proposed array area?

- Throughout the applicant’s responses to public submissions - [Xodus Global - fa807cb1-a5ce-46eb-aba8-a6487f76cd8a.pdf \(www.gov.ie\)](#) – there are several references to the purported “short duration and temporary nature of the site investigation activities”. Five years is neither short nor temporary.
- The applicant has stated that it “provided all required hard copies in the required locations for consultation as instructed and approved by the Department with all documents also available online”. There is no information on the project website ([Sceirde Rocks Windfarm | Powering Irish Communities](#)) regarding the foreshore licence application. The Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement ([Code of Practice community engagement.pdf \(dcae.ie\)](#)) states that “for the duration of the project, from scoping right through to decommissioning, a copy of all relevant information must be made available for inspection online through the project website and for viewing publically accessible locations such as local authority offices and public libraries or similar”. In not providing the information on the project website the applicant is clearly not adhering to the requirements as outlined in the code of practice. It is also noted that it would be expected, given the scale of the proposed survey works and the proposed wind farm, that the applicant would go beyond the bare minimum with regard to public consultation and community engagement. It is also noted that the code of practice states that “the Community Liaison Officer should make publically available full, clear and comprehensive information about the project during key milestone stages of development (e.g. pre-planning, planning, construction)”. This clearly has not been achieved to date with the proposed wind farm at Sceirde Rocks. If the applicant genuinely wished to engage in open and active community engagement and public consultation surely some or all of the following would have been carried out:
  - o Publicising of the foreshore licence application more widely and encouraging and supporting engagement with the public consultation process
  - o Holding a public meeting (or meetings) regarding the foreshore licence to provide information on the types of surveys, the location of surveys, and the timeframe for surveys. This could also have provided an opportunity for engagement with citizen science with regard to local knowledge regarding the area that will be impacted by the surveys

These have not happened. It is also noted that key community groups have not been consulted including the local church, Carna Community Café, and local kayakers / sailors.

- In the Department of Housing, Local Government and Heritage’s submission it is noted that the applicant should apply for a regulation 54 consent from NPWS. This requires ecological and environment assessment to be carried out. Has the applicant made this application? Can the foreshore licence be awarded if this process is pending / not started? The applicant has responded ‘noted’ in response to this but has not provided any information on the application for the regulation 54 consent.
- The applicant has stated in response to a point in my previous submission that “the surveys will have no significant impact on the operations of the atmospheric research station at Mace Head”. On what basis has this conclusion been arrived at? It is my understanding from speaking with the team involved in the research at the station that there is potential for the survey works to impact the research stations readings. What consultation has been undertaken with the principal investigators for the ongoing research programmes at the Mace Head Atmospheric Research Station?

- The applicant has stated in response to a point in my previous submission regarding Macquarie's Green Investment Group (GIG) independent trustees concerns with regard to GIG's risk and opportunity management that "it is not clear how this statement is relevant to the foreshore licence application". Surely it is not that difficult to work out how this is relevant. The applicant is part of GIG. The applicant is applying to carry out survey works that are significant in scale. Any indication of issues with the applicant's capacity to deliver works effectively are relevant to the foreshore licence application.
- With regard to a point raised in my previous submission regarding kelp and seagrass in the survey area the applicant has stated "any impact to kelp would be consistent with the that described in our assessment reports which demonstrate the small footprint of our survey works relative to the wider area of habitat that is available". The assessment reports do not mention kelp and seagrass at all. These are incredibly important habitats and we are very lucky to have significant habitats present in this area. It is imperative that the potential impacts of the survey works on these habitats are properly assessed.
- In response to a point raised in my previous submission regarding potential impact of the surveys works on blue carbon sequestration, the applicant has stated "given the nature of the survey works and the relatively small footprint (as considered in the assessment on seabed habitats) it is not considered that there will be any impact on blue carbon sequestration". Can you please provide indication of where the mentioned assessment of seabed habitats can be found? On what basis has the applicant concluded that there will not be any impact on blue carbon sequestration? 60 no. boreholes are likely to have an impact on blue carbon sequestration. Has the applicant consulted with the project team at [BlueC](#)? Or any other experts in this area?
- In relation to a point raised in my previous submission regarding the Climate Action Plan requirement for the "development of offshore renewable energy to progress at pace alongside the conservation, protection, and recovery of marine biodiversity", the applicant has stated that "the environmental assessment documents submitted with the FSL application are solely focused on assessing potential impacts of the survey activities included in the FSL application". The Climate Action Plan requirement does not have a clause stating that this requirement does not apply to survey works associated with offshore renewable energy. How does the applicant intend to meet the requirement to ensure conservation, protection, and recovery of marine biodiversity alongside the proposed survey works?
- The applicant states several times in the responses to submissions that "impacts from the presence of construction and operation of the offshore wind farm are not relevant to the surveys being requested in this FSL application and are therefore not considered". It is impossible to consider the proposed survey works without considering the proposed wind farm for which the survey works are proposed. The location and scale of the proposed wind farm is inappropriate for this area and this has to be considered in regard to the potential investment in expensive and impactful survey work that could be better applied to other renewable energy efforts. What criteria have led to selection of this site, which is so ecologically important, for this development? What other sites have been assessed in line with the EIA directive?
- I note the Government's Foreshore Unit notification of 18 May 2023 regarding "Pausing determination of existing consent applications relating to prospective ORE site investigation activity until the Offshore Renewable Energy (ORE) Designated Areas have statutory effect". The decision reflects a move to a more planned approach to Offshore Renewable Energy (ORE), away from the current developer led model and states:

*It is critical that a robust planning framework is put in place that ensures not only achievement of our offshore energy objectives but also maintenance of our environmental protection obligations, economic wellbeing of local communities and the interests of other marine users.*

I understand that this notice from the Foreshore Unit refers to ORE phase 2, however it cannot be allowed that projects that have not been assessed through a more robust planning process are allowed to proceed simply by virtue of their timing in relation to the improved planning processes.

- It is noted that the Environmental Assessment and EIA Screening Report and Natura Impact Statement have been carried out separately for the proposed survey works along the proposed cable corridor and for the proposed Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm. Given the cable corridor would be integral to the wind farm (i.e. it would be required for the wind farm to operate) this would appear to be 'project splitting' and in breach of EU rules. Why have the environmental impacts of the proposed survey works for the cable corridor and for the wind farm not been considered jointly?

Le meas,

[REDACTED]

## Public Submission 9

**From:** [REDACTED]

**Sent:** Tuesday 30 May 2023 18:52

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

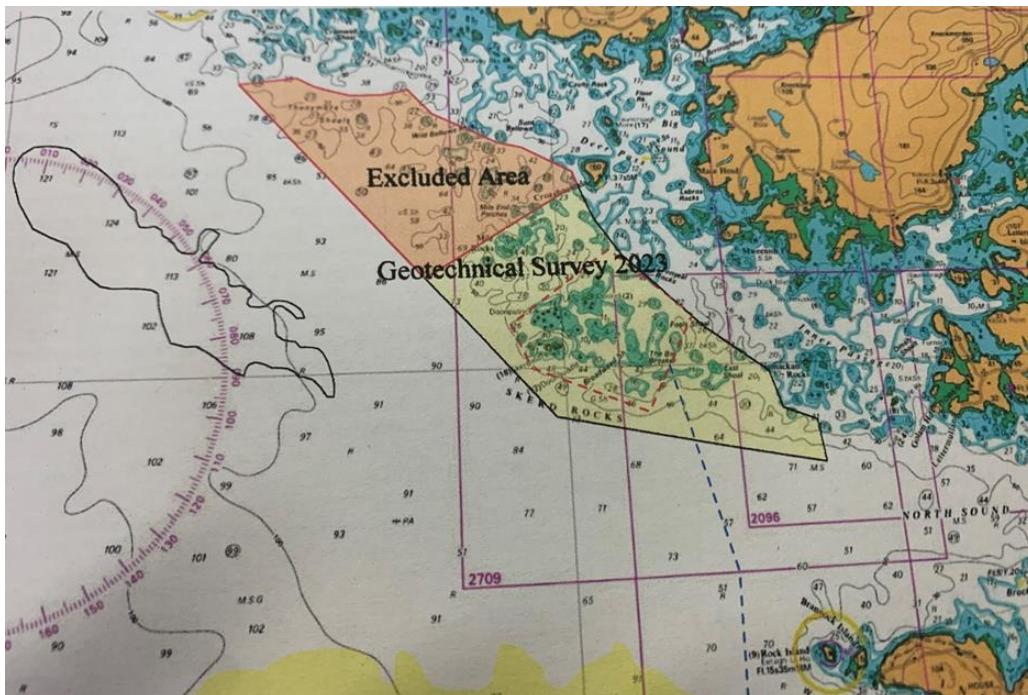
**Subject:** FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

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A chara

I am a resident of Oileán Muighinis and I am writing to state my objections to foreshore licence application FS007161 for site investigations for the proposed Sceirde Rocks Offshore Wind Farm.

- The applicant has stated in response to submissions querying the size of the survey area that “the reason for the wider survey area requested is to enable data to be collected outwith the relevant project boundary that will still support project design and future EIA workstreams. It is important when developing and designing a project to have data on the environment in the area surrounding the project. In addition the FSL survey area was submitted before the MAC for the project had been confirmed”. Representatives for the applicant shared on 8 February 2023 that the site layout map provided with the foreshore licence application did not correctly show the proposed survey area. We were presented with the following and told that this was the correct site layout map:



If this is the case, why would the applicant a) not update the site layout map when the natura impact statement was updated, and b) not make reference to this in response to submissions querying the extent of the survey area? The apparent inability of the applicant to provide a coherent overview of the survey extents is quite worrying. It would be inappropriate for the foreshore licence to be awarded without clarity on this. It is noted that the foreshore licence application by the same applicant for survey work along the proposed cable corridor describes this foreshore licence application as the

“Sceirde Rocks OWF array area foreshore licence application (FS007161)”. Is the area presented in the site layout map the applicant’s proposed array area?

- Throughout the applicant’s responses to public submissions - [Xodus Global - fa807cb1-a5ce-46eb-aba8-a6487f76cd8a.pdf \(www.gov.ie\)](#) – there are several references to the purported “short duration and temporary nature of the site investigation activities”. Five years is neither short nor temporary.
- The applicant has stated that it “provided all required hard copies in the required locations for consultation as instructed and approved by the Department with all documents also available online”. There is no information on the project website ([Sceirde Rocks Windfarm | Powering Irish Communities](#)) regarding the foreshore licence application. The Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement ([Code of Practice community engagement.pdf \(dcca.ie\)](#)) states that “for the duration of the project, from scoping right through to decommissioning, a copy of all relevant information must be made available for inspection online through the project website and for viewing publically accessible locations such as local authority offices and public libraries or similar”. In not providing the information on the project website the applicant is clearly not adhering to the requirements as outlined in the code of practice. It is also noted that it would be expected, given the scale of the proposed survey works and the proposed wind farm, that the applicant would go beyond the bare minimum with regard to public consultation and community engagement. It is also noted that the code of practice states that “the Community Liaison Officer should make publically available full, clear and comprehensive information about the project during key milestone stages of development (e.g. pre-planning, planning, construction)”. This clearly has not been achieved to date with the proposed wind farm at Sceirde Rocks. If the applicant genuinely wished to engage in open and active community engagement and public consultation surely some or all of the following would have been carried out:

- o Publicising of the foreshore licence application more widely and encouraging and supporting engagement with the public consultation process

- o Holding a public meeting (or meetings) regarding the foreshore licence to provide information on the types of surveys, the location of surveys, and the timeframe for surveys. This could also have provided an opportunity for engagement with citizen science with regard to local knowledge regarding the area that will be impacted by the surveys

These have not happened. It is also noted that key community groups have not been consulted including the local church, Carna Community Café, and local kayakers / sailors.

- In the Department of Housing, Local Government and Heritage’s submission it is noted that the applicant should apply for a regulation 54 consent from NPWS. This requires ecological and environment assessment to be carried out. Has the applicant made this application? Can the foreshore licence be awarded if this process is pending / not started? The applicant has responded ‘noted’ in response to this but has not provided any information on the application for the regulation 54 consent.
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- The applicant has stated in response to a point in my previous submission regarding Macquarie's Green Investment Group (GIG) independent trustees concerns with regard to GIG's risk and opportunity management that "it is not clear how this statement is relevant to the foreshore licence application". Surely it is not that difficult to work out how this is relevant. The applicant is part of GIG. The applicant is applying to carry out survey works that are significant in scale. Any indication of issues with the applicant's capacity to deliver works effectively are relevant to the foreshore licence application.
- With regard to a point raised in my previous submission regarding kelp and seagrass in the survey area the applicant has stated "any impact to kelp would be consistent with the that described in our assessment reports which demonstrate the small footprint of our survey works relative to the wider area of habitat that is available". The assessment reports do not mention kelp and seagrass at all. These are incredibly important habitats and we are very lucky to have significant habitats present in this area. It is imperative that the potential impacts of the survey works on these habitats are properly assessed.
- In response to a point raised in my previous submission regarding potential impact of the surveys works on blue carbon sequestration, the applicant has stated "given the nature of the survey works and the relatively small footprint (as considered in the assessment on seabed habitats) it is not considered that there will be any impact on blue carbon sequestration". Can you please provide indication of where the mentioned assessment of seabed habitats can be found? On what basis has the applicant concluded that there will not be any impact on blue carbon sequestration? 60 no. boreholes are likely to have an impact on blue carbon sequestration. Has the applicant consulted with the project team at [BlueC](#)? Or any other experts in this area?
- In relation to a point raised in my previous submission regarding the Climate Action Plan requirement for the "development of offshore renewable energy to progress at pace alongside the conservation, protection, and recovery of marine biodiversity", the applicant has stated that "the environmental assessment documents submitted with the FSL application are solely focused on assessing potential impacts of the survey activities included in the FSL application". The Climate Action Plan requirement does not have a clause stating that this requirement does not apply to survey works associated with offshore renewable energy. How does the applicant intend to meet the requirement to ensure conservation, protection, and recovery of marine biodiversity alongside the proposed survey works?
- The applicant states several times in the responses to submissions that "impacts from the presence of construction and operation of the offshore wind farm are not relevant to the surveys being requested in this FSL application and are therefore not considered". It is impossible to consider the proposed survey works without considering the proposed wind farm for which the survey works are proposed. The location and scale of the proposed wind farm is inappropriate for this area and this has to be considered in regard to the potential investment in expensive and impactful survey work that could be better applied to other renewable energy efforts. What criteria have led to selection of this site, which is so ecologically important, for this development? What other sites have been assessed in line with the EIA directive?
- I note the Government's Foreshore Unit notification of 18 May 2023 regarding "Pausing determination of existing consent applications relating to prospective ORE site investigation activity until the Offshore Renewable Energy (ORE) Designated Areas have statutory effect". The decision reflects a move to a more planned approach to Offshore Renewable Energy (ORE), away from the current developer led model and states:

*It is critical that a robust planning framework is put in place that ensures not only achievement of our offshore energy objectives but also maintenance of our environmental protection obligations, economic wellbeing of local communities and the interests of other marine users.*

I understand that this notice from the Foreshore Unit refers to ORE phase 2, however it cannot be allowed that projects that have not been assessed through a more robust planning process are allowed to proceed simply by virtue of their timing in relation to the improved planning processes.

- It is noted that the Environmental Assessment and EIA Screening Report and Natura Impact Statement have been carried out separately for the proposed survey works along the proposed cable corridor and for the proposed Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm. Given the cable corridor would be integral to the wind farm (i.e. it would be required for the wind farm to operate) this would appear to be 'project splitting' and in breach of EU rules. Why have the environmental impacts of the proposed survey works for the cable corridor and for the wind farm not been considered jointly?

Le meas,

██████████

## Public Submission 10

May 31st, 2023

### 3rd Public Consultation - FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

*A chara,*

I am a resident of [REDACTED], Co. Galway. I'm making this objection/submission to the proposed Foreshore License Application (FS007161) by Fuinneamh Sceirde Teoranta (FST), for the proposed Sceirde Rocks Offshore Wind Farm (450 MW) located off Carna, Co. Galway.

I am gravely concerned that the proposed project will have negative impacts on our environment - which is *already* degraded. I request that the relevant environmental protection and planning authorities do their job, on behalf of the public. Regarding this foreshore license application FS007161, I am requesting that the relevant government authorities ensure that all available environmental protection legislation be followed.

In my opinion, the proposed foreshore license application FS007161 should not be granted as it poses significant harm to a variety of protected fish, bird and marine mammal species.

#### 1) What criteria have led to selection of this ecologically important site for this development?

This area is renowned for its pristine marine environment. The unspoiled Connemara coastline is world famous and draws huge amounts of tourists every year. The marine life (fish, bird and mammal) is vibrant in large part because there is no major industry here - marine or land-based. The proposed site investigation will damage, and the proposed Sceirdre Rocks Offshore Wind Farm for which it is purposed will destroy, this pristine coastline and the tourism upon which many locals, including ourselves, depend.

In their responses to previous submissions, the applicant states several times that "impacts from the presence of construction and operation of the offshore wind farm are not relevant to the surveys being requested in this FSL application and are therefore not considered". This seems illogical to me. It is impossible to consider the proposed survey works without considering the proposed wind farm for which the survey works are proposed. The location and scale of the proposed wind farm is inappropriate for this area and this has to be considered in regard to the potential investment in expensive and impactful survey work that could be better applied to other renewable energy efforts.

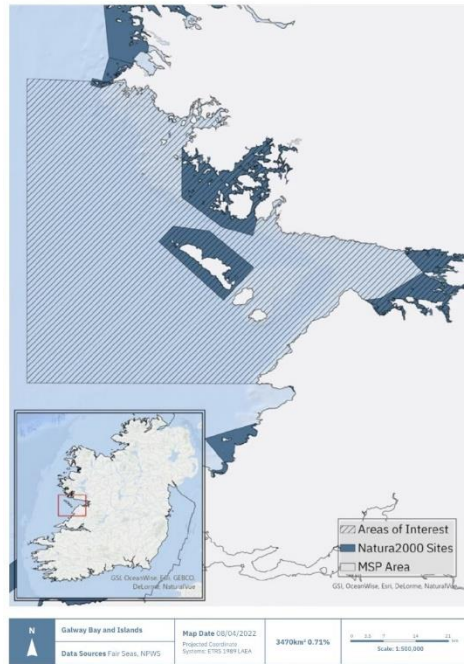
#### 2) The applicant's refreshed Natura 2000 Impact Statement offers no new protection measures and simply repeats their previous claim that the proposed site investigations will pose no significant threat to any fish, bird or marine mammal species.

This claim is hard to believe for 2 reasons:

Firstly, throughout the applicant's responses to public submissions - [Xodus Global - fa807cb1-a5ce-46eb-aba8-a6487f76cd8a.pdf \(www.gov.ie\)](#) – there are several references to the purported "short duration and temporary nature of the site investigation activities". Five years is neither short nor temporary.

Secondly, the area indicated in this application is surrounded by protected Natura 2000 sites and is within the Galway Bay & Islands Area of Interest as outlined by the Fair Seas campaign (see image below, p. 38, Fair Seas document "Revitalising Our Seas - Identifying Areas of Interest for Marine Protected Area Designation in Irish Waters"). These are very ecologically sensitive areas that cannot avoid being adversely affected by the survey procedures proposed in FS007161.





**a)** Amongst the fish species adversely affected from the impact of the noise and seabed disturbance of the proposed site investigations will be Haddock and Atlantic Haddock as their spawning and nursery areas lie within or adjacent to the proposed site of the boreholes. This is illustrated by the GIS images (<https://data.gov.ie/>) below:

Orange: the applicant's cable corridor for proposed survey area for FS007161 and also FS007543

Grey: Haddock nursery grounds.

Dark red: Atlantic Haddock spawning and nursery grounds.

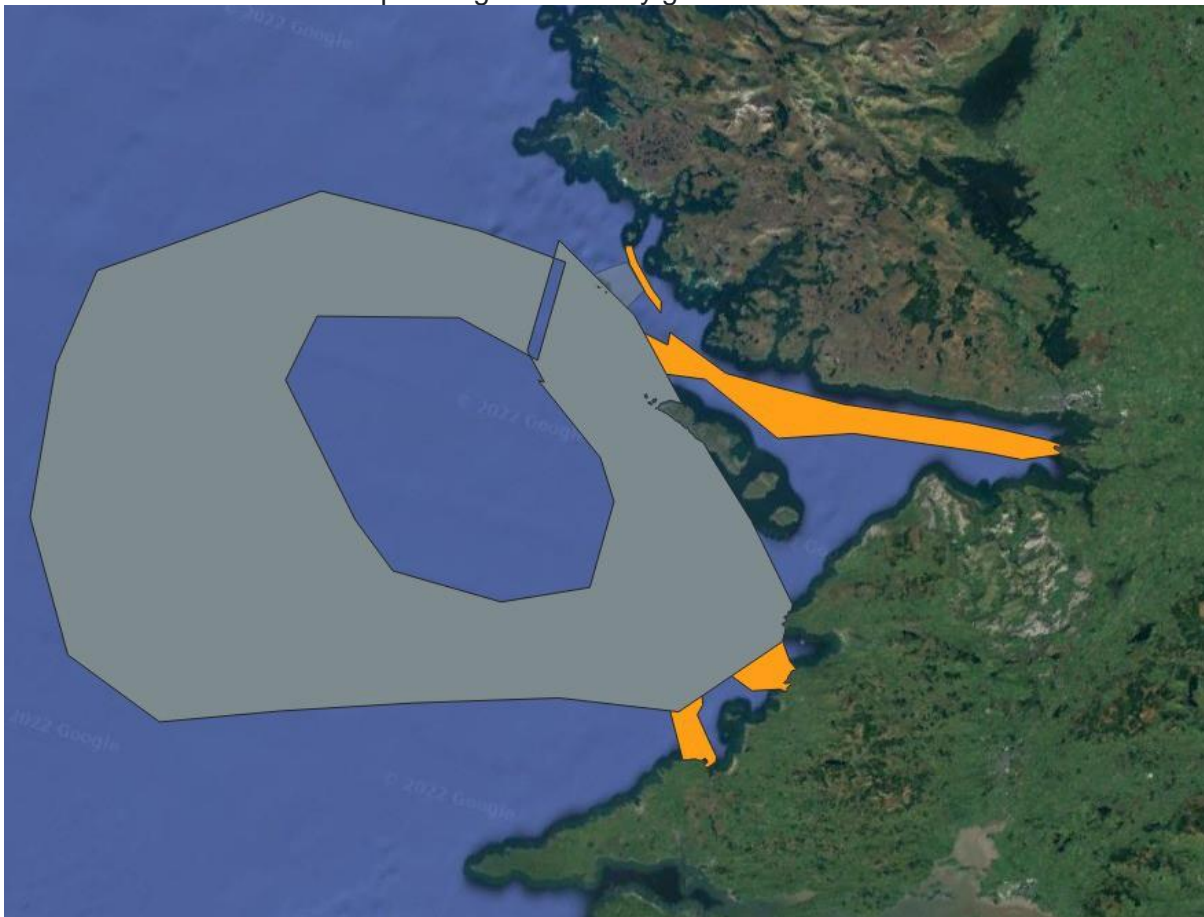


Figure 4 - Interac/on between proposed survey area for cable corridor (in orange) and haddock nursery grounds (in grey)

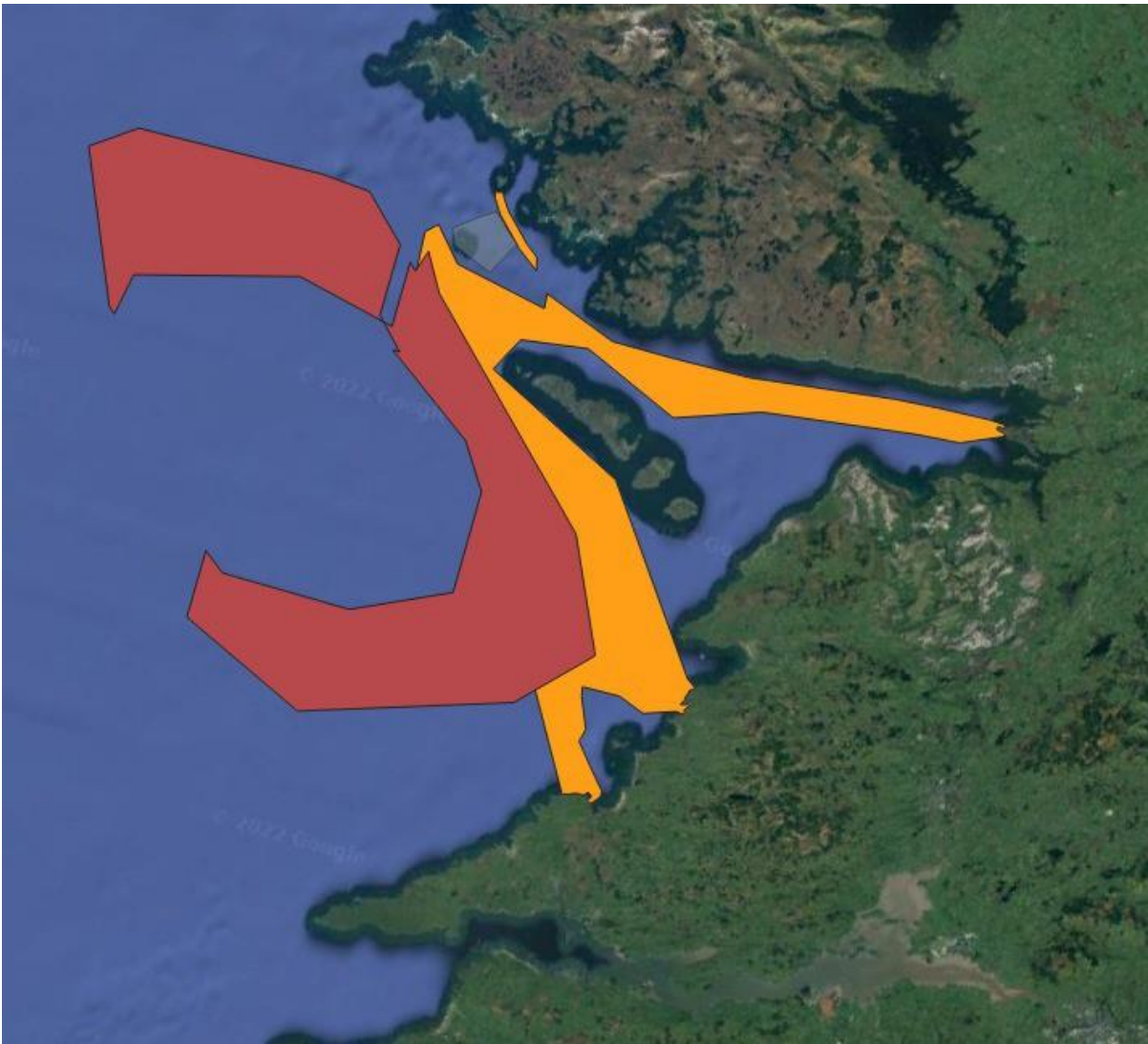


Figure 6 - Interac/on between proposed survey area for cable corridor (in orange) and Atlan/c Haddock spawning and nursery grounds (in red)

The applicant repeats several times that fish are not disturbed by noise. However, the water displacement from impacts and the significant seabed disturbance and silting posed by drilling 70m boreholes and hauling 2025 tonne CPT units across the seabed can only have a negative impact on these haddock spawning and nursery grounds.

**b)** The marine mammals at risk from the proposed procedures in FS007161 include Bottlenose Dolphin who have a designated SAC on the Western Connaught Coast and are regularly seen further south - often directly within the proposed site investigation area. Also at risk are Grey Seals who are a protected species in the SAC's at Slyne Head Peninsula & Islands and Harbour seals who are protected in the SAC's at Cashla Bay, Inverin and Mannin Bay.

FS007161 Section 4.4.2 Bottlenose Dolphin (p. 42)

In this section, the applicant simply concludes that the conservation efforts for the Bottlenose dolphin populations at the various SAC's at Slyne Head, Duvillaun Islands, and West Connaught Coast will not be adversely affected by the proposed site investigations. To back this up, the following sentence is offered: "The conservation objectives to maintain the favourable condition of bottlenose dolphin in the West Connacht Coast SAC are provided in Appendix B but notably refer to disturbance from human activity not adversely affecting bottlenose dolphin".

I disagree strongly with FS007161 Section 4.4.2 for 2 reasons:

- 1) There is a local Bottlenose Dolphin population with the site investigation area. I've regularly seen Bottlenose Dolphin pods on the Carna coastline adjacent to the site investigations area. The IWDG database lists eight reported sightings to the IWDG of Bottlenose Dolphin pods in the Carna area around Mason & MacDara's Islands since the beginning of 2023 (<https://iwdg.ie/browsers/sightings>). Five of these sightings have been in the month of May alone. Sightings have included the presence of baby dolphins and juveniles. The West Connaught Coast and the Slyne Head Islands and Peninsula are designated SAC's for Bottlenose Dolphin. Based on the regularity of bottlenose dolphin sightings for the past 5 months of this year alone, I feel that this area must support the Galway Bay & Islands SAC dolphin populations as well as some that may move south from the West Connaught Coast SAC. Because of this, I feel that the area from Clifden heading south to the Aran Islands should be considered as an SAC for Bottlenose Dolphin.
- 2) The significant noise and seabed disturbance from the proposed site investigation activities certainly pose a risk to this locally occurring dolphin population. I could not verify the applicant's assertion above concerning the NPWS document to which they refer the following statement "but notably refer to disturbance from human activity not adversely affecting bottlenose dolphin". However, I did find a paragraph from that same NPWS document that contradicts this assertion - please see the below quote:

***"\*Target 2: Human activities should occur at levels that do not adversely affect the bottlenose dolphin population at the site.***

- *Proposed activities or operations should not introduce man-made energy (e.g. aerial or underwater noise, light or thermal energy) at levels that could result in a significant negative impact on individuals and/or the population of bottlenose dolphin within the site. This refers to the aquatic habitats used by the species in addition to important natural behaviours during the species annual cycle.*
- *This target also relates to proposed activities or operations that may result in the deterioration of key resources (e.g. water quality, feeding, etc.) upon which bottlenose dolphins depend. In the absence of complete knowledge on the species ecological requirements in this site, such considerations should be assessed where appropriate on a case-by-case basis.*
- *Proposed activities or operations should not cause death or injury to individuals to an extent that may ultimately affect the bottlenose dolphin population at the site."*
- \* **Source - NPWS (2015) Conservation Objectives: West Connacht Coast SAC 002998. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht. West Connacht Coast SAC (site code: 2998) Conservation objectives supporting document- marine species**

As I said in my previous submission to FS007161, Sceirde Rocks Foreshore Application FS007161 Table 4.9 lists the decibel levels from impulsive noise sources for SBP & USBL. The levels listed are within 180dB - 240 dB re1mPa - a "scale (which) is roughly equivalent in air to noise levels experienced at a rock concert up to sound levels that can cause organ rupture" (p. 5, IWDG Offshore Wind Farm Policy Document). The applicant reports protection procedures for marine mammals which are limited to slow starts and an MMO on board during daylight hours with binoculars. Such minimal marine mammal protection procedures are quite outdated and dangerously insufficient, according to the Irish Whale and Dolphin Group (IWDG) in their Offshore Wind Farm Policy Document ([https://iwdg.ie/cms\\_files/wp-content/uploads/2020/12/IWDG-Offshore-Windfarm-Policy-Document.pdf](https://iwdg.ie/cms_files/wp-content/uploads/2020/12/IWDG-Offshore-Windfarm-Policy-Document.pdf)). In this document, the IWDG issues 25 recommendations on updated marine mammal protection procedures for offshore wind farm companies. Amongst them, IWDG strongly recommends that wind farm companies use Passive Acoustic Monitoring (PAM) to monitor and track cetacean movement in the areas of their survey and installation operations. IWDG recommends the use of Acoustic Deterrent Devices. IWDG also recommend that "Noise levels should be actively monitored during static operations such as pile driving, and should apply the most up to date TTS levels in noise emission monitoring. As per best practice in Germany and other jurisdictions, where noise levels exceed control levels, operations must cease until lower noise levels can be achieved. Noise mitigation measures such as coffer dams, bubble curtains and other Noise Abatement Systems (NAS) should be

implemented where appropriate to reduce noise emitted into the environment, taking into account the depth, current, seabed and environmental conditions of the site" (p. 6, IWDG Offshore Wind Farm Policy Doc.).

The Irish government should require all wind farm developers to abide by the marine mammal protection recommendations listed in the IWDG Offshore Wind Farm Policy Document. If the Irish Government is sincere in its claims of protecting marine mammals, Application FS007161 should be denied.

FS007161 4.4.3 Grey Seal and Harbour Seal (p. 42)

This section simply states "the site investigations activities will not have any adverse effect on the ability of grey seals or harbour seals to survive or reproduce due to underwater noise or vessel disturbance". As the hearing of Harbour Seals and Grey Seals is especially sensitive, it is difficult to believe that the noise and seabed disturbance from site investigation activities will have no impact for the Harbour Seals of the SAC of Kilkerrin Bay and Islands and the Grey Seals of the SAC's of Slyne Head Islands and Inishbofin and Inish Turk. Again, as I say above, the applicant's proposed mitigation procedures for reducing the risk to marine mammals are dangerously insufficient.

If the Irish Government is sincere in its claims of protecting marine mammals, Application FS007161 should be denied.

*Is mise le meas,*

 Carna  
Co. Galway



### **3rd Public Consultation - FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm**

Date 29/05/23

To Whom It Concerns,

I would like to object on several grounds to the refreshed Natura Impact Statement from FS007161 for the proposed Sceirdre Rocks Offshore Wind Farm.

#### **1) This project should not go ahead.**

The turbines should not be installed so close to the shore (of Oileáin Mhic Dara and the surrounding coastline. The technology for floating turbines is already being used successfully in Scotland and Portugal. If licensing was fast tracked here, floating turbines could be installed 30-40km offshore where the wind is stronger, more constant and the turbines would have less impact on the coastal environment. Oileáin Mhic Dara has one of Ireland's oldest Christian churches. This national monument dates from the 6th century, is in good condition, is regularly visited and is used annually for Mass at St. MacDara's Festival.

The Galway County Development Plan 2009-2015 states, in Section 7.6.2 Energy Objectives, the following objective in relation to the location of Wind Farms:

"Objective IS18:

Facilitate wind farm developments in suitable locations, having regard to any designations of areas of the County for this purpose, government guidelines and the need to protect, inter alia, designated heritage sites, designated sensitive rural landscapes, visually vulnerable areas, scenic routes and scenic views." ([https://www.galway.ie/en/media/Galway\\_County\\_Council\\_DevPlan2009-2015.pdf](https://www.galway.ie/en/media/Galway_County_Council_DevPlan2009-2015.pdf))

The above objective would clearly mean that the area around Oileáin Mhic Dara and Sceirdre Rocks should be left untouched.

#### **2) Destruction of shallow reef between Oileáin Mhic Dara and Sceirdre Rock.**

In the applicant's Natura Impact Statement, Section 3.2, Article 6 Obligations, it states that "The Habitat's Directive applies the precautionary principle to European sites and projects can only be permitted when it is ascertained that there will be no adverse effect on the integrity of the site(s) in question"

The installation of up to 30v turbines in the area of Sceirdre Rock would destroy large sections of the shelf, destroying a valuable habitat for lobster and crab which are the mainstay of the local fishermen. The area also has a vast bed of kelp which is one of the most effective carbon sequestration resources in the area - this will also be destroyed if turbines are installed.

#### **3) Misleading information regarding turbine size.**

Initial planning was for 150m high turbines. The new proposed turbines are 330m high. This will have a completely overwhelming affect on the seascape.

#### **4) Damaging effect on the Bottlenose Dolphin.**

The area is located beside the Slyne Peninsula Islands and Peninsula SAC in which the Bottlenose Dolphin is a protected species. Bottlenose dolphin pods are common visitors to the area surrounding Oileán Mhic Dara where dolphin pods can often be seen feeding. These pods will be driven from this area by the site investigation activities proposed in FS007161, disrupting their habitual feeding and breeding behaviours. Should the proposed Sceirdre Rocks OWF be approved, these local Bottlenose Dolphin pods will be severely adversely affected.

#### **5) No (S)EA Directive carried out.**

There seems to be insufficient transparency with the public as to the scale of the proposed Sceirdre Rocks OWF and the effect it will have on the environment. The only local copy of the Natura Impact Statement was in the local Garda station, which is uninhabited and locked for 90% of the time.

#### **6) Mace Head Atmospheric Research Station would have to cease operations.**

Mace Head Atmospheric Research Station is one of 6 globally important climate research stations for monitoring atmospheric quality and changes. Last August, Minister Eamon Ryan welcomed the Government's decision to join the EU Integrated Carbon Infrastructure Observation Consortium (ICOS). He was quoted as saying "It is essential that climate observation carried out in Ireland are of high quality and are comparable with observations being carried out across Europe and globally." Mace Head Atmospheric Research Station has been doing just this type of research since the 1950's. There is no need for it to close if the turbines were to be located 40km offshore.

To conclude, there is obviously a huge future for production of wind energy in Ireland as we have such an incredible resource off our west coast. There's no need for these huge turbines to be installed close to shore where they will have a devastating effect on the coastal landscape and environment. The technology is there to install floating wind farms far off the coast. All that is required is for planning to be fast tracked to allow this to happen. They could be in operation before 2030 if action is taken now. We should be thinking of the future now and not making a decision that will be regretted for future generations to come.

Kind regards, [REDACTED]

**Public Submission 12**

**From:** [REDACTED]  
**Sent:** Wednesday 31 May 2023 11:13  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** FS007161

**CAUTION:** This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

A chara,

Maidir le comhairliúchán FS007543 do cheadúnais urthrú le haghaidh "Site Investigation to inform feasibility assessments and design in relation to the proposed development of an offshore wind farm array area off County Galway" (i mBéarla amháin): Is údar mór inní dom é iarmhairtí dhiúltacha na forbartha beartaithe ar an mbithéagsúlacht agus muid i lár mhórchorraíl éiceolaíochta.

Tá géarchéim agus droch stádas na bithéagsúlachta aitheanta go náisiúnta agus go hidirnáisiúnta. Feictear dom nach dtagann an plean forbartha beartaithe le spriocanna caomhnaithe an Aontais Eorpaigh don nádúr, ar muir agus ar tír, len iad a choinneáil i riocht sláintiúil agus ó bhaol a ndíothaithe.

Toisc an t-iarratas a bheith i mBéarla amháin, ní aithnítear agus ní urramaítear cearta, eolas, lena n-áirítear eolas traidisiúnta na ndaoine dúchasacha agus an phobail áitiúil ins an gcomhairliúchán seo. Sáraíonn sé ár gcearta ar rannpháirtíocht iomlán a bheith ag an bpobal i gcomhairliúcháin phoiblí in ár dteanga dhúchais.

Ag cur leis an aighneacht a rinne mé roimhe seo iarraim go ndiúltófaí don iarratas seo.

Le mór mheas,

[REDACTED]  
[REDACTED]  
[REDACTED]

Conamara  
Co. na Gaillimhe.

Dear Sir/Madam,

Regarding the consultation FS007543 for foreshore license applications for "Site Investigation to inform feasibility assessments and design in relation to the proposed development of an offshore wind farm array area off County Galway" (in English only): I have significant concerns about the potential negative impacts of the proposed development biodiversity as we are in the midst of major ecological upheaval.

The crisis and poor status of biodiversity are recognized both nationally and internationally. It seems that the proposed development plan does not meet the conservation goals of the European Union to keep nature, sea and land in a healthy state and free from the risk of extinction.

Due to the application being in English only, the rights and knowledge, including traditional knowledge of indigenous people and the local community, are not recognized and respected in this consultation. It undermines our rights to full participation of the community in public consultations conducted in our native language.

I request that this application be rejected, taking into account the concerns I raised previously.

Kind regards,

A black rectangular redaction box covering the signature of the sender.

Conamara  
Co. na Gaillimhe.



## Public Submission 13

Submission to Foreshore License FS007161- Fuinneamh Sceirde Teoranta

A Chara,

I wish to object to the Foreshore License FS007161 by Fuinneamh Sceirde Teoranta

- I am deeply concerned that such a proposal could even be considered so close to the shore (30 X 15MW turbines = 450 MW). The proposed windfarm is too close to shore and would have a detrimental impact on stunning landscapes and seascapes we enjoy here. Standard practice in other E.U member states is to locate wind farms up to 22 km from land, it should be no different here in Carna. The proposal to erect wind farms within close proximity 5km from Mynish island is unacceptable. Furthermore, the indicative threshold established for highly sensitive seascapes during a DTI study on three areas in the U.K are shown in the table below

*Threshold for seascapes*

Thresholds
<13km possible major visual effects
13-24 km moderate visual effects
>24 possible minor visual effects

Source: Wratten et al: (2005)

The proposed development is far too close to the shore, contrary to international best practice and the scale of the development will have a very major visual impact.

We are extremely concerned that the proposal will harm views on the surrounding islands and Skeirde rocks. It will have a significant adverse impact on the perception of viewers standing on the coastline. The views from the Mynish/Carna coast is unique and this proposal will harm areas of outstanding natural beauty.

- I would also be hugely concerned about the noise from such wind turbines being carried along the sea to shore and affecting houses close to the sea. Studies confirm that noise carries much further on water than it does on land. Again, the proposed wind farm is too close to shore and will have a negative impact on local communities.
- Site investigation would cause major disruption to the sea bed and all living creatures. Biodiversity loss is as important an issue as climate change, which needs to be protected along with our stunning seascapes, tourism industry, local fishing economy. There are other options available that would cause less disruption i.e floating offshore windfarms and would be a more suitable option. Floating technology allows wind farms to be situated in deep water far from the coast 22km+ minimising the impact on nature, tourism, fishing, visual impact and other marine users.

Le meas,



**Public Submission 14**



Foreshore Licence Applications FS007161 & FS007543

by

Fuinneamh Sceirde Teoranta

31st May 2023.

## Introduction

In February 2009, together with numerous other concerned groups, Coastal Concern Alliance objected to the granting of a Foreshore Lease Application for construction of a wind farm on a site in the area that is incorporated in the current Foreshore Licence Application area. Objections were based on environmental and visual impacts and because proper planning procedures, (e.g, avoidance of project splitting) had been breached. It was clear at that time that, at an even earlier stage in the concept and planning process in 2005, serious concerns had already been expressed by such reputable bodies as An Taisce, who were clear that the site was of high conservation value and that the development would have 'significant impact on this protected coast'.

One has to ask, given the unambiguous feedback given to the Department at that time, why, almost twenty years later applications are even being entertained for what is now a vastly expanded proposal from that proposed in 2009. In this current application the area of the site is doubled from the one considered in 2009 and the size of the development proposed multiplied more than four-fold. In 2009, the proposal was for construction of twenty, 5MW turbines, a total of 100MW. Now, in the same general location the application proposes to construct 450 MW.

What this application serves to illustrate is the utter failure of the Irish government, specifically the Foreshore Consenting division of the Department of Housing, Local Government and Heritage, to pay the slightest heed to valid scientifically based feedback from citizens objecting to offshore wind farm developments on utterly unsuitable sites. This same failure is evident in the decision (19 May 2020) to sanitise legacy applications such as this one and others on the east coast by classing them as 'relevant' projects, breaching every norm of good planning. This was a process cooked up with development interests behind closed doors and was subject to no site selection oversight, no Strategic Environmental Assessment (or indeed any environmental assessment), no public consultation and no Dáil debate. It was 'announced' by Ministers Richard Bruton and Damien English on 19 May 2020, when the country was in Covid lockdown and there was no system of appeal available to the public, in breach of the Aarhus convention. Even if there had been an appeal process in place, given the lockdown it would have been exceedingly difficult for the public to attend to this completely 'out-of-the blue' announcement when they had had no involvement or awareness of the 'process' that led to this extraordinary event.

## **Objection to the grant of these Foreshore Licences**

Unfortunately, due to time constraints we are unable to elaborate on the various points on which our objections are based. However, having read the submissions already made in response to the earlier public consultation on these Foreshore Licence applications, many of the submissions made have already expanded on the issues we wish to raise with details of the legal and environmental justification supporting the objections they raise. We rely on these more detailed submissions to add to this brief comment from Coastal Concern Alliance.

The following list summarises our objections.

1. That there are two applications, one for the area of the windfarm site investigation and one for the Cable corridor should not be permitted as the two relate to one proposed development. This project splitting was flagged by An Taisce in 2008-9.
2. The site area is expanded very significantly from the area granted 'relevant' project status in May 2020.
3. We query the adherence to the requirements of the Aarhus Convention in the awarding of 'relevant' project status to this proposal, or to any of the other proposals treated in the same manner.
4. Internal Departmental records, copies of which are held by CCA, reveal the state of all these applications in June 2019, and show the serious flaws in the consenting and assessment processes to that date.
5. The dreaming up (behind closed doors, with input from prospective offshore industry representatives) of the idea that all this could be whitewashed by granting some special status to these applications - with no environmental assessment, public information or public consultation - is in breach of the Aarhus Convention that requires the government to provide to the public INFORMATION and facilitate PUBLIC CONSULTATION and AN APPEALS PROCEDURE THAT IS FAIR, EQUITABLE, TIMELY & not prohibitively expensive in relation to issues that have the potential to have an impact on the environment. None of these three requirements were adhered to in the granting of 'relevant' project status.
6. The granting of special 'relevant' status to these seven projects, including FST, appears to have no legal or statutory basis. It was simply a 'sanitising' of flawed applications under an outdated and undemocratic marine planning regime, the Foreshore Act 1933.
7. The subsequent grant of Maritime Area Consent is equally flawed.

8. None of these applications, including FST, have been subject to Strategic Environmental Assessment, in breach of the SEA Directive.
9. The proposed area of the site investigation spans numerous Natura 2000 sites, protected under the Habitats Directive. These are detailed in other submissions.
10. This is a rich shellfish spawning and fishing ground and is totally unsuitable for any industrial intrusion into the environment.
11. The site is an important Heritage Area, totally unsuitable for disturbance, even that that would be required to carry out the investigations for which consent is requested in the current licence applications.
12. The site is an important area for tourism and is unsuitable for development.
13. It is convenient for the Department to state that the current applications are for site investigation only. However, with each step that the Department takes, in their role as representatives of State and 'the public interest', when these steps expose developers to ever increasing costs, even before their proposed projects have got to the stage of undergoing ANY environmental assessment or applying for development consent, **the Department exposes the Irish taxpayer to the risk of costs to defend legal challenges**, as is already happening on the east coast.
14. We believe that this is a risk that should be carefully assessed, in the public interest.
15. It has long been flagged that a development of a wind farm in this location will have serious impact on the 70 years of data collection at Mace Head Atmospheric Weather Station. We object to the awarding of investigation licences that increase the risk that this internationally valuable data set would be sacrificed for an industrial development that is totally inappropriate in the area anyway.
16. The proximity to shore of the investigations proposed, that would pre-determine the proximity to shore proposed for the construction of industrial turbines 300m + in height (or any height), is totally out of line with best practice internationally. No where in the world would this proposal be even considered, or indeed proposed. In other jurisdictions, where proper marine planning and environmental assessment laws and regulations are in place, developers would know that making an application such as this would be futile.
17. We call on the Irish government to respect the Irish environment, its biodiversity, as is required under the Biodiversity Action Plan, the Habitats and Birds Directives and Irish citizens and put in place the same kind of planning and environmental safeguards that are in place in other EU countries.
18. These Foreshore Licence Applications must be rejected.

Coastal Concern Alliance is an independent voluntary citizens' group, set up in 2006 to campaign for reform of Foreshore Legislation and the introduction of ecosystem based Marine Spatial Planning, to balance competing interests in our seas and conserve marine wildlife, habitats, ecosystems and coastal landscapes. We have no association with any political party or industry group.

## Public Submission 15

To: Foreshore Section, Department of Housing, Local Government and Heritage, Newtown Road, Wexford, Co Wexford; Email: [foreshoreORE@housing.gov.ie](mailto:foreshoreORE@housing.gov.ie) .

From: Wild Ireland Defence CLG Email: [secretary.wildirelanddefence@gmail.com](mailto:secretary.wildirelanddefence@gmail.com)

Date: 31/05/2023

Re: Foreshore Application Ref: FS007161 – Sceirde Rocks Wind Farm Array

Proposed Development Activity:

“Sceirde Rocks Offshore Wind Farm is a fixed bottom offshore wind farm off the West Coast of Ireland and under the Transitional Protocol is recognised as a Relevant or Phase One project. As such, Sceirde Rocks Offshore Wind Farm is a high priority project and it is anticipated that this project will be prioritised through the Foreshore License process, the MAC award process and subsequently will be one of the first projects eligible for the first ORESS-1 auction. Sceirde Rocks Offshore Wind Farm will be targeting an accelerated delivery programme for this offshore project to meet government renewable energy targets pre-2030. This application specifically relates to a foreshore license for site investigation activities in the wind farm array area only.”

...

“The Public consultation under Section 19 of the Foreshore Act 1933, and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 in relation to the application was held between the period of 4th January 2023 and 2nd February 2023 and again from 30th January 2023 and 28th February 2023.

The Applicant has submitted an updated Natura Impact Statement to reflect the Department’s Marine Advisor’s recommendations and therefore a Repeat Consultation period is required under Section 19 of the Foreshore Act 1933, and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011.”

A chara,

This submission is made in addition to the previous observation made by Wild Ireland Defence CLG regarding the above proposed foreshore development.

The following is submitted in good faith and based on concerns regarding the achievement of the objectives of the Nature Directives.

In 2016 the EU Commission determined that both the Habitats and Birds Directives (providing strict protection for protected habitats and species) remain fit for purpose. However, the Commission emphasised the need to better implement both directives, as follows:

"Commission evaluation shows Nature Directives are fit for purpose.

...

On 16/12/2016 the Commission has published the 'Fitness Check' evaluation of the EU Birds and Habitats Directives (the 'Nature Directives') and concluded that, within the framework of broader EU biodiversity policy, they remain highly relevant and are fit for purpose.

However, full achievement of the objectives of the Nature Directives will depend on substantial improvement in their implementation in close partnership with local authorities and different stakeholders in the Member States to deliver practical results on the ground for nature, people and the economy in the EU."

(Available at: [https://ec.europa.eu/environment/nature/legislation/fitness\\_check/index\\_en.htm](https://ec.europa.eu/environment/nature/legislation/fitness_check/index_en.htm))

Our coastal, marine, and protected environments are experiencing ever increasing pressures from various developments, including the development of offshore alternative energy projects. To be sustainable, these developments must be reconciled with fully satisfying the State’s EU obligations regarding environmental protection and arresting the current ecological crisis. In this regard it is requested that: i) the State implements the Nature Directives in a manner fully consistent with legislation and case law, and in addition to all other EU legal instruments that support the sustainable coexistence of relevant but conflicting activities in our marine environment, ii) competent authorities ensure their observations, examinations, assessments, and determinations are consistent with their responsibilities under environmental protection law, and iii) competent authorities demonstrate the precautionary principle.

Please acknowledge submission receipt.

Yours sincerely,



---

Secretary, Wild Ireland Defence CLG.,  
North Allihies, Beara, Co. Cork.



## Public Submission 16

Submission to Foreshore License FS007161- Fuinneamh Sceirde Teoranta

A Chara,

I wish to object to the Foreshore License FS007161 by Fuinneamh Sceirde Teoranta

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### *Threshold for seascapes*

Thresholds

**<13km possible major visual effects**

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Source: Wratten et al: (2005)

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We are extremely concerned that the proposal will harm views on the surrounding islands and Skeirde rocks. It will have a significant adverse impact on the perception of viewers standing on the coastline. The views from the Mynish/Carna coast is unique and this proposal will harm areas of outstanding natural beauty.

- I would also be hugely concerned about the noise from such wind turbines being carried along the sea to shore and affecting houses close to the sea. Studies confirm that noise carries much further on water than it does on land. Again, the proposed wind farm is too close to shore and will have a negative impact on local communities.
- Site investigation would cause major disruption to the sea bed and all living creatures. Biodiversity loss is as important an issue as climate change, which needs to be protected along with our stunning seascapes, tourism industry, local fishing economy. There are other options available that would cause less disruption i.e floating offshore windfarms and would be a more suitable option. Floating technology allows wind farms to be situated in deep water far from the coast 22km+ minimising the impact on nature, tourism, fishing, visual impact and other marine users.

Le meas,



## Public Submission 17

Submission to Foreshore License FS007161- Fuinneamh Sceirde Teoranta

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Le meas,



## Public Submission 18

Submission to Foreshore License FS007161- Fuinneamh Sceirde Teoranta

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Le meas,



**Public Submission 19**

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

**30<sup>th</sup> May 2023**

To whom it may concern:

We fishermen who are members of Iascairí Sceirde are forwarding our objection to the amended NIS.

**Iascairí Sceirde Submission**

**FS 007161**

**Fuinneamh Sceirde Teo**

**Proposed Site Investigation for the proposed Sceirde Rocks Wind Farm**

We are submitting an objection to the Foreshore Licence application in our capacity as fishermen operating in the area.

We are part of the Iascairí Sceirde fishing group located at Carna, Co. Galway. We have been fishing in the proposed licensed area for between 5 and 6 generations, we have fished the Sceirde Rocks area for most of our adult lives, we follow a fishing tradition that goes back to the middle of the 1800s. We have 20 crew working on our vessels.

This is a supplemental submission filed as part of the repeat consultation process, we refer to and rely on our submissions put forward in the initial consultation process.

We have serious concerns about the environmental and biodiversity damage which is likely to occur as a result of the invasive and excessive survey methods planned to take place in sensitive fishing grounds. We consider that the potential for an adverse impact on the integrity of European Sites has not been excluded beyond a reasonable scientific doubt.

The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended.

The Directive lists certain habitats and species that must be protected within SACs. Irish habitats include raised bogs, blanket bogs, turloughs, sand dunes, machair (flat sandy plains on the north and west coasts), heaths, lakes, rivers, woodlands, estuaries and sea inlets. The 25 Irish species which must be afforded protection include Salmon, Otter, Freshwater Pearl Mussel, Bottlenose Dolphin and Killarney Fern.

The proposed site for Fuinneamh Sceirde Wind Farm is adjacent to Marine Natura 2000 sites listed below.

**Inis Mór SAC:**

Inishmore is of considerable scientific interest primarily for the wide range of good quality habitats which occur, and the floristic richness of many of these habitats. The island supports an impressive array of rare and threatened plant species, and it also provides excellent habitat for several bird species.

**Impact:**

The physical disruption by the invasive boring, and noise may disrupt the shoals of fish that protected species sea birds depend on for food and more importantly the protected habitat Reefs [1170] submerged or partially submerged sea caves [8330] that the site is designated to protect.

**Kilkieran Bay and Islands SAC:**

Kilkieran Bay and Islands is an extensive coastal complex site that is of high conservation value, particularly for the fine examples of marine and terrestrial E.U Habitats Directive Annex I habitats that it supports and for its important Slender Naiad, Otter, seal and seabird population.

Of its qualifying interest, the following are important in respect of this project given the proximity:

Mudflats and sandflats not covered by seawater at low tide [1140]

Large shallow inlets and bays [1160]

Reefs [1170]

*Lutra lutra* (Otter) [1355]

*Phoca vitulina* (Harbour Seal) [1365]

**Impacts:**

The disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected otter and Seal as listed above. The prey fish species for these species know no boundaries and are at risk from noise pollution. The disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected harbour and grey seals. This may result in reduced foraging for the protected species. Therefore, there is a potential pathway receptor source connection to the project which has not been fully explored in the NIS.

The risk of sediment from the invasive boring spreading on the currents may have a negative impact on the protected reefs, shallow inlets and mudflats and sandflats of the Kilkieran and Islands SAC. Risk needs to be assessed relative to currents and predicted sediment plumes. Neither of these pathways to impact have been fully assessed in the NIS.

**Slyne Head Islands SAC**

This site is an important example of exposed low-lying western islands with good examples of reefs, a significant grey seal population and important colonies of breeding birds. The site is also of conservation importance due to the occurrence of groups of Bottlenose Dolphin, a species listed on Annex II of the E.U. Habitats Directive. They are specifically designated to protect Reefs [1170] *Tursiops truncatus* (Common Bottlenose Dolphin) [1349] *Halichoerus grypus* (Grey Seal) [1364].

**Impacts:**

The risk of sediment from the invasive boring spreading on the currents may have a negative impact on the protected reefs in the Slyne Head and Islands SAC.

The disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected grey seals.

The disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected bottlenose Dolphins.

More importantly the drilling may disrupt migration of dolphins which is a specific conservation objective in relation to these species. The NIS has not demonstrated that no migratory impacts are liable from this exploration works. This does not reach the bar of “no significant impact” beyond reasonable scientific doubt.

### **Slyne Head to Ardmore Point Islands SPA**

Designated to Protect

Barnacle Goose (*Branta leucopsis*) [A045]

Sandwich Tern (*Sterna sandvicensis*) [A191]

Arctic Tern (*Sterna paradisaea*) [A194]

Little Tern (*Sterna albifrons*) [A195]

Baranacle geese are extremely sensitive to any disturbance and as a result only inhabit offshore islands. Increased disturbance may have a significant impact on this migratory bird.

Terns forage in the area and feed on fish. They may be excluded from the area by drilling and exploration activities with negative consequences on their success in breeding and migration. There is a clear link to impact on these species which cannot be excluded. The NIS is inadequate in this respect.

Referencing one example from the NIS:

Geotechnical Drilling has noise in the range 2 Hz – 50 kHz

“Popper and Hawkins (2012) report that, on average, birds’ hearing is most sensitive at 2 – 5 kHz in air, with sensitivity dropping off greatly below 1 kHz and above 4 kHz (Crowell et al., 2015). Underwater, auditory sensitivity testing on cormorants and auks has also indicated elevated sensitivity to sound frequencies of 1 – 4 kHz (Hansen et al., 2017; Hansen et al., 2020)”

Therefore, there is a potential significant impact which has not been explored fully.

The fact that the proposed is adjacent to the Natura sites the invasive type of surveying is likely to have a negative impact of the protected species and the protected reefs mentioned in the above SACs and SPAs

Overall, what is lacking in the NIS is an ecosystem approach. The NIS is generic with no specific details on how the QI species or SCI species use the area for feeding, resting or breeding. No maps showing the distribution of the QI habitats is presented. It is our contention that the assessment is lacking and does not meet the bar for the habitats directive of demonstrating **No** significant impacts beyond reasonable scientific doubt.

### **Process**

It is a concern that the applicant proposes undertaking investigations simultaneously noting the level of invasive surveying that forms part of this licence application, along with other licence applications in the area. The in--combination effect of this development will cause significant issues for the marine environment and biodiversity in the area.

The applicant has not provided exact details of the borehole locations within the Foreshore Licence area. The licence documentation provides details of the large structures that will be placed on the seabed and it is not acceptable that the locations of these areas are yet to be identified and adequately assessed. The applicant accepts that sensitive habitats, including reefs are present in the area and it is clear these areas are at risk of damage from this vague and unsubstantiated application. The applicant states that final borehole and CPT locations can be provided to the Department of Housing, Local Government and Heritage prior to survey mobilisation if required. This information should be before the Minister at this point so that the areas can be adequately assessed and protected and the public have an opportunity to be consulted on what is proposed.

The applicant is proposing that the geotechnical surveys are phased to account for uncertainty and to allow the preliminary investigation to inform future surveys. The applicant has an obligation to put the best scientific evidence before the Minister however this licence goes against this principle and allows the applicant to gather information in a piecemeal fashion and not report to the decision maker, or allow the public an opportunity to comment on the evolving stages of surveying and the effects this will have on the marine environment.

## **Drilling**

The applicant continues to fail to put forward precise and accurate information regarding drilling. It is noted that materials, including minerals will be extracted as part of the process. The Minister should not grant a licence for the extraction of minerals at this depth in this process. In addition, it appears that the purpose of the drilling goes beyond mere investigation into soil stability and as such, is not exempt development.

The specific coring fluids have not been identified and details relating to the discharge of the cuttings are unclear. The applicant accepts that 10/20% of the cuttings will not be recovered for analysis yet there is no waste management plan or assessment for this disturbance to the seabed.

## **Geophysical Survey Investigations**

The applicant and the Minister are aware of the large number of dolphins, whales and cetaceans in this area. This high frequency type of surveying will cause significant damage to Annex II species and we will rely on specialist submissions from other interested groups as part of our objection.

It is noted that the geophysical data will be used for various assessments, including to identify sensitive marine habitats to be avoided during geotechnical and environmental sampling. If the Minister is permitting this type of surveying, the information should subsequently be put before the Minister as part of the application for permission to carry out invasive geotechnical investigations and there should be public and prescribed consultation in relation to the information gathered.

In this regard, it is notable that the applicant carried out investigations in 2022. The information gathered should be fully before the Minister and the public as part of this process to ensure adequate protection of the marine environment.

The applicant has not specifically identified the equipment to be used in the surveys. It is noted that there can be a considerable difference in the operating frequencies on different types of equipment. The applicant has not provided sufficient scientific evidence in relation to the effects of the various different operating frequencies on the protected species in the area.

### **Fishing and rural communities**

We have already set out our concerns in relation to the lack of adequate consultation with the fishing community in our previous submissions. The applicant refers to consultations and proposed consultations but fails to address the significant concerns that have been put forward at these meetings by the fishing industry. The Minister needs to go beyond consultation conditions and put forward binding and meaningful conditions ensuring the applicants must enter into agreements with the fishing industry if surveying will take place. It is known that the surveying either requires the movement of the fishermen and fishing gear or in the alternative, results in a downturn in fishing from the invasive geotechnical methods. It is unacceptable to expect the fishing industry to absorb these losses both in the short and long term.

### **Conclusion**

We have fished the proposed licence area for many generations and are acutely aware of the level of species and protected habitats in the area. We do not accept the conclusions that the best scientific information has been put forward and adequately assessed in this application. We do not accept that the “industry approved mitigation measures” will ensure there is no adverse effect (alone or in combination with another plan of protection) on the integrity of any European Site. The level of development proposed off the coast of Ireland will change our seas indefinitely if permissions are granted without adequate consideration of the effect it will have on the marine environment. The destruction of the marine environment will have a detrimental effect on the fishing industry, the rural communities and tourism. We are concerned about the gold rush mentality associated with the current offshore wind farm projects and would ask the Minister to properly consider the long-term effect of these short lived projects.



The following fishermen are members of Iascairí Sceirde.

[illegible]

## Public Submission 20

Minister for Housing, Local Government and Heritage,  
Foreshore Section,  
Department of Housing, Local Government and Heritage,  
Newtown Road,  
Wexford,  
CO. WEXFORD

31 May 2023

Re: Foreshore Licence Application -- Fuinneamh Sceirde Teoranta, FS007161

Dear Sirs,

We are submitting an objection to the Foreshore Licence application in our capacity as a buyer of high quality seafood in the local area and supplier of bait.

Our company purchases and processes cooked shellfish to supply supermarkets all over Ireland. We supply both fresh and frozen seafood to the Irish market. In addition, our company is a successful exporter of fresh, frozen, cooked and live shellfish to both Europe and China.

We refer to our submission filed in relation to the initial public consultation process and repeat rely on the contents of same.

In respect of the response to the public submission we filed, it is most disappointing that the Applicant notes that *"Commencement of survey activities is subject to foreshore licence consent and the availability of a suitable survey contractor. The Applicant will consult with local fishermen to develop and implement where possible a survey programme which minimises the risk of any potential losses through effective planning and coordination of the survey activities"*.

This response entirely ignores the contents of our initial submission, wherein we set out that we received no compensation for the loss of revenue suffered as a result of the 2022 survey carried out by the applicant. The Applicant engaged in extensive geophysical type surveying in 2022 and removed a number of fishermen from the survey area to facilitate the movement of the survey vessels. The fishermen are customers of Breizon Limited and, as a result, we suffered direct losses as a result of the survey activities. We understand that the Minister often attaches a

consultation condition to a Foreshore Licence granted, which requests the Applicant to consult with local fishermen in relation to survey activity. We understand that this general condition does not protect the fishermen in relation to losses suffered as a result of survey activity and we can say that with experience, we are aware that suppliers, including ourselves, are not dealt with by the offshore windfarm companies, including the Applicant.

At this point, we have received correspondence from the Applicant's Solicitor confirming that our losses will not be dealt with in relation to the 2022 survey activity. We can only expect that if the Minister grants this licence, without a binding condition attached thereto ensuring the protection of both the fishermen and the fishing industry, including buyers and suppliers, our entire operation is at risk. We are an important employer in a rural community and should not be ignored as part of this process. We would ask the Minister to refuse this licence application. In the event that a positive determination is considered, we would ask that a binding condition is attached to the licence obliging the applicant to enter into agreements with members of the fishing industry to deal with loss of earnings/revenue. Mere consultation is not sufficient.

We also have serious and legitimate concerns about environmental damage to the marine environment resulting from the proposed licensed activities. The environmental assessments are vague and unsubstantiated. The proposed licence area contains sensitive and protected habitats and species. The in-combination effect of the various types of surveys and ultimately development in the area has not been properly considered.

Filed on behalf of Breizon Limited,  
Rossaveal,  
Galway,  
IRELAND.

**Public Submission 21**

Minister for Housing, Local Government and Heritage,  
Foreshore Section,  
Department of Housing, Local Government and Heritage,  
Newtown Road,  
Wexford,  
CO. WEXFORD

31<sup>st</sup> May 2023

Re: Foreshore Licence Application – Fuinneamh Sceirde Teoranta, FS00161  
Cumann Iascairi Oileáin Árann  
Repeat Consultation submission

Dear Sirs,

We refer to the above application.

We are filing a submission to this Licence Application as we are part of the Cumann Iascairi Oileáin Árann

We operate around the Aran Islands, where the proposed cable corridor route is due to cut through as part this project. Our fishing grounds are also located near this proposed licence area.

We are attaching our submission for Licence Application FS007543 and also rely on the contents of the submission for this project as the licence applications are intrinsically linked.

Submission filed by the following members of Cumann Iascairi Oileáin Árann

Inis Oirr

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Inis Meain

[REDACTED]  
[REDACTED]  
[REDACTED]

Inis Mor

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Minister for Housing, Local Government and Heritage,  
Foreshore Section,  
Department of Housing, Local Government and Heritage,  
Newtown Road,  
Wexford,  
CO. WEXFORD

31<sup>th</sup> May 2023

Re: Foreshore Licence Application – Fuinneamh Sceirde Teoranta, FS007543

Cumann Iascairi Oileáin Árann

Repeat Consultation process

Dear Sirs,

We are submitting an objection to the Foreshore Licence application in our capacity as local fishermen.

We are part of the Cumann Iascairi Oileáin Árann group. We operate from Inis Oírr, Inis Meáin and Inis Mór. We are actively fishing lobster, crab and white fish all year round and mackerel seasonally.

We rely and repeat the contents of our submission filed as part of the initial consultation.

#### **Process**

It is a concern that the applicant proposes undertaking investigations simultaneously noting the level of invasive surveying that forms part of this licence application, along with other licence applications in the area. The in--combination effect of this development will cause significant issues for the marine environment and biodiversity in the area.

The applicant has not provided exact details of the borehole locations within the Foreshore Licence area. The licence documentation provides details of the large structures that will be placed on the seabed and it is not acceptable that the locations of these areas are yet to be identified and adequately assessed. The applicant accepts that sensitive habitats, including reefs are present in the area and it is clear these areas are at risk of damage from this vague and unsubstantiated application. The applicant states that final borehole and CPT locations can be provided to the Department of Housing, Local Government and Heritage prior to survey mobilisation if required. This information should be before the Minister at this point so that the areas can be adequately assessed and protected and the public have an opportunity to be consulted on what is proposed.

The applicant is proposing that the geotechnical surveys are phased to account for uncertainty and to allow the preliminary investigation to inform future surveys. The applicant has an obligation to put the best scientific evidence before the Minister however this licence goes against this principle and allows the applicant to gather information in a piecemeal fashion and not report to the decision maker, or allow the public an opportunity to comment on the evolving stages of surveying and the effects this will have on the marine environment.

#### **Drilling**

The applicant continues to fail to put forward precise and accurate information regarding drilling. It is noted that materials, including minerals will be extracted as part of the process. The Minister should not grant a licence for the extraction of minerals at this depth in this process. In addition, it appears that the purpose of the drilling goes beyond mere investigation into soil stability and as such, is not exempt development.

The specific coring fluids have not been identified and details relating to the discharge of the cuttings are unclear. The applicant accepts that 10/20% of the cuttings will not be recovered for analysis yet there is no waste management plan or assessment for this disturbance to the seabed.

### **Geophysical Survey Investigations**

The applicant and the Minister are aware of the large number of dolphins, whales and cetaceans in this area. This high frequency type of surveying will cause significant damage to Annex II species and we will rely on specialist submissions from other interested groups as part of our objection.

It is noted that the geophysical data will be used for various assessments, including to identify sensitive marine habitats to be avoided during geotechnical and environmental sampling. If the Minister is permitting this type of surveying, the information should subsequently be put before the Minister as part of the application for permission to carry out invasive geotechnical investigations and there should be public and prescribed consultation in relation to the information gathered.

In this regard, it is notable that the applicant carried out investigations in 2022. The information gathered should be fully before the Minister and the public as part of this process to ensure adequate protection of the marine environment.

The applicant has not specifically identified the equipment to be used in the surveys. It is noted that there can be a considerable difference in the operating frequencies on different types of equipment. The applicant has not provided sufficient scientific evidence in relation to the effects of the various different operating frequencies on the protected species in the area.

### **Fishing and rural communities**

We have already set out our concerns in relation to the complete lack of consultation with the fishing community in our previous submissions. We as a group have been left out of any referenced consultation and in any event, we understand that the concerns of other fishermen are not taken on board by the applicants. The Minister needs to go beyond consultation conditions and put forward binding and meaningful conditions ensuring the applicants must enter into agreements with the fishing industry if surveying will take place. It is known that the surveying either requires the movement of the fishermen and fishing gear or in the alternative, results in a downturn in fishing from the invasive geotechnical methods. It is unacceptable to expect the fishing industry to absorb these losses both in the short and long term.

We are told that the applicants preferred route will be north and west of the Aran Islands and as such, will cause devastation to our fishing industry. We have already been hit hard by decommissioning; the fishing industry is dying on our islands. We would ask the Minister to consider the effect this development will have on the Aran Islands and surrounding communities when considering this application.

## **Conclusion**

We have fished the proposed licence area for many generations and are acutely aware of the level of species and protected habitats in the area. We do not accept the conclusions that the best scientific information has been put forward and adequately assessed in this application. We do not accept that the “industry approved mitigation measures” will ensure there is no adverse effect (alone or in-combination with another plan of protect) on the integrity of any European Site. The level of development proposed off the coast of Ireland will change our seas indefinitely if permissions are granted without adequate consideration of the effect it will have on the marine environment. The destruction of the marine environment will have a detrimental effect on the fishing industry, the rural communities and tourism. The Aran Islands is particularly vulnerable in this regard and deserves the protection of the Minister.

Filed by the following members of Cumann Iascairi Oileáin Árann  
Inis Oirr

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Inis Meain



[REDACTED]

[REDACTED]

[REDACTED]

Inis Mor

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

## Public Submission 22

From: [REDACTED]  
Sent: Wednesday 31 May 2023 16:38  
To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
Subject: FS007161 - Sceirde Rocks Offshore Wind Farm

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I would like to object to the location of the proposed offshore wind farm at Sceirde Rocks.

The effect that this wind farm would have on one of our most beautiful and natural coastlines would far outweigh the benefits to be derived.

While I fully support wind generation becoming our main source of energy, the amount to be generated by this farm as a proportion of our eventual target is tiny, but the detrimental effects on the natural beauty and marine ecology are massive.

In a few years, wind generation technology will have evolved whereby these fixed turbines will have been superseded by floating turbines, but the fixed turbines will remain and will be prohibitively expensive to decommission.

The other impact this development has is possibly even more critical, ie the destruction of the shallow reef off Carna and the habitat for lobster and crab - this wind farm would have a devastating effect on what is already a fragile ecosystem.

In sum, it makes no sense to pursue a climate friendly path on the one hand while destroying the environment on the other.

--

Regards,

[REDACTED]  
[REDACTED]

## Public Submission 23

**From:** [REDACTED]  
**Sent:** Wednesday 31 May 2023 16:46  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** Sceirde

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[REDACTED]  
[REDACTED]  
Carna  
Co na Gaillimhe  
[REDACTED]  
A chara,

Ba mhaith liom mo thuairimí agus aighneacht a chur chugat, maidir leis an feirm gaoithe atá beartaithe do timpeall Carraigeacha na Sceirde amach ó chósta Mhuigh Inse.

Tuigim an tábhachtach a bhaineann le fuinneamh in-athnuaite agus tacaíonn mé leis an gcoincheap ach feictear dom nach é an suíomh atá beartaithe faoi láthair an áit cheart don togra.

An chéad chúis imní atá orm na an easpa eolais atá tugtha don phobal áitiúla maidir leis an togra. Nuair a bhí an comhairliúchán poiblí ann maidir leis an togra i 2008, bhí íomhánna *photomontage* curtha ar fáil ag taispeáint an tionchar a bheadh ar na tuirbíní ar an tírdhreach agus an spéir. Níl tada mar seo curtha ar fáil go fóill agus tuigim go mbeidh na tuirbíní seo i bhfad níos mó ná na ceanna a bhí beartaithe i 2008. Leis seo feictear dom go bhfuil eolas dhá cheilt ar an bpobal agus nach bhfuil tuiscint ag an bpobal faoi chomh mór agus taibhseach a bheas na tuirbíní seo ar cheantar Iorras Aithneach agus Muigh-Inis go háirithe.

Imní eile atá orm ná nach bhfuil tuairimí na ndaoine dhá thabhairt san áireamh ar chor ar bith ag An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht. Chuir mise aighneacht isteach ag an Roinn seo maidir leis an togra seo i 2008 agus ní bhfuair mé oiread agus admháil ar ais ón Roinn. Má theann duine sa trioblóid agus tuairimí agus aighneacht a chur isteach sé an rud is lú a bheadh duine ag súil leis ná a bheith coinnithe ar an eolas maidir leis an togra.

I 2008 bhí imní agamsa maidir leis an “flicker effect”, tionchar ar an dúlra, na héin agus iasc na farraige agus go háirithe ar an tionchar diúltach a bheadh ag an togra seo ar áilleacht na háite. Tá na himní ceanna agam anois. Nuair a bhí mé féin ag cur isteach pleanáil do mo theach cónaithe ar thailte mo mhuintir i mo áit dúchais, ceann mór do na pointí a bhí luaite ná an tionchar feiceála (*visual impact*) in áit le “*high visual amenity*” ar nós Conamara a bheadh ag aon tógáil. Is cosúil nach bhfuil sé seo san áireamh anseo ar chor ar bith le struchtúir chomh hard le tuairim 300 meadar gan eolas ar an méid acu a bheas ann.

Imní mór eile atá agam ná an tionchar a bheas ag an togra seo ar mo mheabhairshláinte agus meabhairshláinte pobal Charna. Baineann an pobal úsáid ollmhór as acmhainn na farraige agus an cladach chun éalú ó strúsanna an tsaoil agus ár n-intinn a choinneáil folláin. Leis na tuirbíní ollmhór seo amach ón gcósta beidh an radharc agus na fuaimeanna a chloiseann muid go laethúil truaillithe

agus dhá bhrí sin ní bheidh an caighdeán maireachtála céanna againn má theann an togra seo ar aghaidh, le linn an tréimhse tógála agus saolré oibre an togra.

Iarraim ar an An Roinn Tithíochta, Rialtais Áitúil agus Oidhreachta mo chuid tuairimí agus aighneacht a thógáil san áireamh agus cinneadh dhá dhéanamh faoin togra seo agus breis eolas a lorg ón iarrthóir agus a scaipeadh ar an bpobal, maidir leis an tionchar ar an bpobal agus an nádúr.

Le meas,

[REDACTED]

Dear Sir/Madam,

I would like to share my opinions and concerns with you regarding the proposed wind farm for the Cliffs of Sceirde area off the coast of Muigh Inis.

I understand the importance of renewable energy and support the concept, but it seems to me that the proposed location is not the right place for the project.

The first concern I have is the lack of information provided to the local community regarding the project. When the public consultation took place in 2008 regarding the project, *photomontage* images were provided to demonstrate the visual impact the turbines would have on the landscape and the sky. Nothing like this has been provided yet, and I understand that these turbines will be much larger than the ones originally planned in 2008. Therefore, it seems to me that there is a lack of transparency towards the community, and that the public does not have a full understanding of how significant and imposing these turbines will be on the Iorras Aithneach and Muigh-Inis area in particular.

Another concern I have is that the opinions of the people are not being taken into account by the Department of Housing, Local Government, and Heritage. I submitted a complaint to this Department regarding this project back in 2008, and I have not received any acknowledgement or response from them since then. If someone goes through the trouble of submitting opinions and concerns, the least they would expect is to be kept informed about the project.

In 2008, I had concerns about the "flicker effect," the impact on nature, birds, and marine life, and particularly the negative effect this project would have on the beauty of the area. I still have the same concerns now. When I was applying for planning permission for my own home on my family's land in the place that I was born, one of the major points mentioned was the *visual impact* in a place known for its "*high visual amenity*", just as Connemara would do for any construction. It seems that this aspect is not taken into consideration here, especially when dealing with structures as tall as approximately 300 meters without information on their actual presence.

Another major concern I have is the impact this project will have on my own mental well-being and the mental well-being of the community in Carna. The community heavily relies on the resources of the sea and coastline to escape the stresses of life and to keep our minds healthy. With these huge offshore turbines the sight and sounds we hear every day will be polluted and therefore we will not have the same quality of life if this project goes ahead, both during the construction period and the working life of the project.

I urge the Department of Housing, Local Government, and Heritage to take my opinions and concerns into account and make a decision regarding this project. It is important to gather further information from the applicant and to share it with the public regarding the impact on the community and the environment.

Kind regards,

[REDACTED]

**Public Submission 24**

From: [REDACTED] >  
Sent: Wednesday 31 May 2023 18:02  
To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
Subject: Fuinneamh Sceirde teoranta

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I wish to make a submission concerning the proposed Sceirde Rocks development. Is it necessary for such a massive development to be sited so close to shore in an area of such natural beauty . Is a floating wind farm , further offshore , a better option for exploiting this massive resource without damaging the environment that is part of Ireland's heritage

Sent from my iPhone

## Public Submission 25

Submission to Foreshore License FS007161- Fuinneamh Sceirde Teoranta

A Chara,

I wish to object to the Foreshore License FS007161 by Fuinneamh Sceirde Teoranta

- I am deeply concerned that such a proposal could even be considered so close to the shore (30 X 15MW turbines = 450 MW). The proposed windfarm is too close to shore and would have a detrimental impact on stunning landscapes and seascapes we enjoy here. Standard practice in other E.U member states is to locate wind farms up to 22 km from land, it should be no different here in Carna. The proposal to erect wind farms within close proximity 5km from Mynish island is unacceptable. Furthermore, the indicative threshold established for highly sensitive seascapes during a DTI study on three areas in the U.K are shown in the table below

*Threshold for seascapes*

Thresholds
<13km possible major visual effects
13-24 km moderate visual effects
>24 possible minor visual effects

Source: Wratten et al: (2005)

The proposed development is far too close to the shore, contrary to international best practice and the scale of the development will have a very major visual impact.

We are extremely concerned that the proposal will harm views on the surrounding islands and Skeirde rocks. It will have a significant adverse impact on the perception of viewers standing on the coastline. The views from the Mynish/Carna coast is unique and this proposal will harm areas of outstanding natural beauty.

- I would also be hugely concerned about the noise from such wind turbines being carried along the sea to shore and affecting houses close to the sea. Studies confirm that noise carries much further on water than it does on land. Again, the proposed wind farm is too close to shore and will have a negative impact on local communities.
- Site investigation would cause major disruption to the sea bed and all living creatures. Biodiversity loss is as important an issue as climate change, which needs to be protected along with our stunning seascapes, tourism industry, local fishing economy. There are other options available that would cause less disruption i.e floating offshore windfarms and would be a more suitable option. Floating technology allows wind farms to be situated in deep water far from the coast 22km+ minimising the impact on nature, tourism, fishing, visual impact and other marine users.

Le meas,

[Redacted Signature]

## Public Submission 26

**From:** [REDACTED]  
**Sent:** Wednesday 31 May 2023 21:58  
**To:** Housing ForeShoreORE <foreshoreORE@housing.gov.ie>  
**Subject:** Fuinneamh Sceirde - aighneacht

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A chara,

Ba mhaith liom mo thuairimí agus aighneacht a chur chugat, maidir leis an bhfeirm gaoithe atá beartaithe timpeall Carraigeacha na Sceirde amach ó chósta Mhuigh Inse.

Tuigim an tábhacht a bhaineann le fuinneamh in-athnuaite agus tacaíonn mé leis an gcoincheap ach feictear dom nach é an suíomh atá beartaithe faoi láthair an áit cheart don togra.

An chéad chúis inní atá orm ná an easpa eolais atá tugtha don phobal áitiúil maidir leis an togra. Nuair a bhí an comhairliúchán poiblí ann maidir leis an togra i 2008, bhí íomhánna photomontage curtha ar fáil ag taispeáint an tionchar a bheadh ar na tuirbíní ar an tírdhreach agus an spéir. Níl tada mar seo curtha ar fáil go fóill agus tuigim go mbeidh na tuirbíní seo i bhfad níos mó ná na ceanna a bhí beartaithe i 2008. Leis seo feictear dom go bhfuil eolas dhá cheilt ar an bpobal agus nach bhfuil tuiscint ag an bpobal faoi chomh mór agus taibhseach a bheas na tuirbíní seo ar cheantar Iorras Aithneach agus Muigh-Inis go háirithe.

Inní eile atá orm ná nach bhfuil tuairimí na ndaoine dhá thabhairt san áireamh ar chor ar bith ag An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta. Chuir mise aighneacht isteach ag an Roinn seo maidir leis an togra seo i 2008 agus ní bhfuair mé oiread agus admháil ar ais ón Roinn. Má theann duine sa trioblóid agus tuairimí agus aighneacht a chur isteach sé an rud is lú a bheadh duine ag súil leis ná a bheith coinnithe ar an eolas maidir leis an togra.

I 2008 bhí inní orm maidir leis an “flicker effect”, tionchar ar an dúlra, na héin agus iasc na farraige agus go háirithe ar an tionchar diúltach a bheadh ag an togra seo ar áilleacht na háite. Tá an inní céanna orm anois. Nuair a bhí mé féin ag cur isteach pleanáil do mo theach cónaithe, ceann mór de na pointí a bhí luaite ná an tionchar feiceála (visual impact) in áit le “high visual amenity” ar nós Conamara a bheadh ag aon tógáil. Is cosúil nach bhfuil sé seo san áireamh anseo ar chor ar bith le struchtúir chomh hard le tuairim 300 meadar gan eolas ar an méid acu a bheas ann.

Inní mór eile atá orm ná an tionchar a bheas ag an togra seo ar mo mheabhairshláinte agus meabhairshláinte pobal Charna. Baineann an pobal úsáid ollmhór as acmhainn na farraige agus an cladach chun éalú ó strúsanna an tsaoil agus ár n-intinn a choinneáil folláin. Leis na tuirbíní ollmhór seo amach ón gcósta beidh an radharc agus na fuaimeanna a chloiseann muid go laethúil truaillithe agus dhá bhrí sin ní bheidh an caighdeán maireachtála céanna againn má theann an togra seo ar aghaidh, le linn an tréimhse tógála agus saolré oibre an togra.



Iarraim ar an An Roinn Tithíochta, Rialtais Áitúil agus Oidhreachta mo chuid tuairimí agus aighneacht a thógáil san áireamh agus cinneadh dhá dhéanamh faoin togra seo agus breis eolas a lorg ón iarrthóir agus a scaipeadh ar an bpobal, maidir leis an tionchar ar an bpobal agus an nádúr.

Le meas,

[REDACTED]  
[REDACTED]

Muigh-Inis  
Carna  
Co. na Gaillimhe

Dear Sir/Madam,

I would like to send you my views and submission, regarding the proposed wind farm around the Rocks of Sceirde off the coast of Mhuigh Inis.

I understand the importance of renewable energy, and I support the concept as well. However, it seems to me that the current proposed location is not the appropriate site for the project.

The first concern I have is the lack of information provided to the local community regarding the project. When the public consultation took place in 2008 regarding the project, photomontage images were provided to demonstrate the visual impact the turbines would have on the landscape and the sky. Nothing like this has been provided yet, and I understand that these turbines will be much larger than the ones originally planned in 2008. Therefore, it seems to me that there is a lack of transparency towards the community, and that the public does not have a full understanding of how significant and imposing these turbines will be on the Iorras Aithneach and Muigh-Inis area in particular.

Another concern I have is that the opinions of the people are not being taken into account by the Department of Housing, Local Government, and Heritage. I submitted a complaint to this Department regarding this project back in 2008, and I have not received any acknowledgement or response from them since then. If someone goes through the trouble of submitting opinions and concerns, the least they would expect is to be kept informed about the project.

In 2008, I had concerns about the "flicker effect," the impact on nature, birds, and marine life, and particularly the negative effect this project would have on the beauty of the area. I still have the same concerns now. When I was applying for planning permission for my own home, one of the major points mentioned was the visual impact in a place known for its "high visual amenity", just as Connemara would do for any construction. It seems that this aspect is not taken into consideration here, especially when dealing with structures as tall as approximately 300 meters without information on their actual presence.

Another major concern I have is the impact this project will have on my mental well-being and the mental well-being of the community in Carna. The community heavily relies on the resources of the sea and coastline to escape the stresses of life and to keep our minds healthy. With these huge offshore turbines the sight and sounds we hear every day will be polluted

and therefore we will not have the same quality of life if this project goes ahead, both during the construction period and the working life of the project.

I request that the Department of Housing, Local Government, and Heritage take into account my opinions and concerns, and make a decision regarding this project. I also ask for further information to be provided by the applicant and shared with the public regarding the impact on the community and the environment.

Kind regards,

A black rectangular redaction box covering the signature of the sender.

Muigh-Inis  
Carna  
Co. na Gaillimhe