

Submission	FSL Application	Consultee Organisation	Consultee Name	Topic	Overview of Comments	Applicant Response
PS1	FS007161	N/A	Anonymous	Tourism	Objection to the proposed offshore wind farm at Sceirde Rocks, on the grounds of despoiling our precious natural heritage.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS2	FS007161	N/A	Anonymous	Benthic ecology	The responder finds it hard to believe that knowledge on benthic habitats and communities in the survey area is based on a diver survey. Not enough is known about the ecosystem and habitats in this area.	The EIA Screening Report used data from the site-specific diver survey, in addition to data from the National Parks and Wildlife Service (rocky habitats data; NPWS, 2019) and EUSiteMap (2019) to characterise the benthic baseline within the Foreshore Licence Area. The geotechnical and environmental surveys proposed under this Foreshore Licence application are being undertaken to extend this knowledge across habitats and species in the benthic community for the purposes of the environmental assessments which will be carried out as part of the windfarm and cable route planning application.
PS3	FS007161	N/A	Anonymous	Marine ecology	Sceirde Rocks 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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS4	FS007161	N/A	Anonymous	Sea angling (tourism)	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 business.	The information provided in our Environmental Assessment and EIA Screening Report demonstrates that any disruption from survey activity will be short term, temporary and not significant on both fishing activity and fish ecology. Any impacts from geotechnical investigations will be of a short duration, and will occur only very close to the sampling locations. There is no evidence to suggest that fish will move away to cause socio-economic impacts for several years.
				Visual	The wind turbines will be a visual intrusion on the land scape at Sceirde Rocks.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Marine ecology	We also do sightseeing and dolphin and seal watching trips, as there are a big number of seals on Sceirde Rocks .	Noted.
PS5	FS007161	N/A	Anonymous	Cultural	This response disputes the calculation of 5 km from 'the mainland coast at its closest point', and not from Macdara's island, which is one of Ireland's most significant national monuments and an important destination for archaeologists, local people following the ancient custom of 'blessing boats', and for tourists.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. The distance is calculated from the nearest inhabited land.
				Visual	The proposed application [for the Sceirde Rocks wind farm] is well within the 'high visual impact', even if the [Scottish Natural Heritage assessment of visual sensitivity] 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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Visual	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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Visual	The proposed windfarm, cannot be construed as a development that is taking place in an 'environmentally and socially responsible manner'.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.

				Visual	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 [on the grounds of social and economic (predominantly landscape and visual) impacts].	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. This is not an application to construct the Sceirde Rocks wind farm. This representation does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS6	FS007161	N/A	Anonymous	Cultural	This response challenges the location of the Sceirde Rocks wind farm which is 5 km from the mainland and 3 km from Macdara's island with its National Monument.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. The distance is calculated from the nearest inhabited land.
				Visual	As well as impacting the natural coastal environment, if allowed to proceed such a development would have a major visual impact on the area.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Cultural; Biodiversity	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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS7	FS007161	N/A	Anonymous		Offshore locations suitable for future wind energy development are scarce and must be chosen carefully	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. The Sceirde Rocks project was designated as a Relevant Status development, and has been awarded Maritime Area Consent by the Irish government.
				Marine ecology; Cultural; Tourism	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 Connemara's coastline along Ireland's diminishing 'Wild Atlantic Way'.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. The information provided in the Environmental Assessment and EIA Screening Report prepared to support the Foreshore Licence application demonstrates that any disruption from survey activity will be short term, temporary and not significant on marine habitats and species.
				Socio-economic; Marine ecology	The benefits of wind farms do not outweigh the negative environmental and social impacts.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Engineering	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	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.

Designated sites	The MPA section of this submission critiques the establishment of the Maritime Area Regulatory Authority and its role in offshore renewables consenting and nature conservation designations. It references the timescales of consenting offshore developments, versus the timescales to designate marine protected areas.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. It is not for the applicant to implement Marine Protected Areas. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
Scale	The Machine Size section of this submission makes reference to the size of the wind turbines likely to be installed at Sceirde Rocks, and the visual and acoustic impacts these could have, and the disruption to the local environment and communities.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
Marine ecology; Socio-economic; Legislative compliance	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.	While noting that this is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts, and not an application for consent for Sceirde Rocks wind farm, the Applicant will adhere to the rigorous demands of the Irish offshore wind consenting regime, with due regard to the environment, social and economic impacts, and will do so in accordance with national legislation requiring public consultation. The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.
Marine ecology	The drilling of 60 boreholes into the seabed in an important marine area cannot be without impact.	The applicant prepared a screening report for the purposes of Directive 2011/92/EC (the Environmental Impact Assessment ("EIA") Directive). This was submitted, together with an Environmental Assessment, as part of the Sceirde Rocks' Foreshore Licence application. It was concluded, in the EIA Screening Report, that the proposed site investigations: <ul style="list-style-type: none"> • Do not fall under the description of activities included within Annex I or Annex II of the Directive; and • Are of such a nature, scale and location that there are no foreseeable significant effects on the environment arising from the proposed activities. On that basis, the need for an EIA to be carried out in respect of the proposed site investigations works can be screened out. An Appropriate Assessment Screening Report and Natura Impact Statement were submitted with the application, and which were prepared in compliance with the relevant provisions of the Habitats Directive and European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and concluded that there would be no adverse impact on the integrity of any European Site.
Cultural; Air quality	The Negative Impacts on Nearby Cultural and Heritage Sites section of this submission challenges the intent to build Sceirde Rocks wind farm less than 5 km from key cultural and natural heritage sites e.g. Macdara's Island. It references Mace Head Weather Station probably having to move as the air flow readings and dispersal of pollutants will be affected by the wind farm.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.

				<p>Socio-economic</p> <p>The Environmental Assessment and EIA Screening Report has not assessed potential socio-economic impacts of the survey works, with respect to tourism on the Wild Atlantic Way.</p>	<p>Vessel operations associated with the surveys will not constitute a significant increase in vessel activity above baseline levels. As set out in the EIA Screening Report:</p> <p>The maximum vessel activity associated with the site investigations is anticipated to be:</p> <ul style="list-style-type: none"> • Various geotechnical survey vessels – 3-6 months in total in different phases over a 5-year period; • Geophysical survey vessel – 2-3 months in different phases over a 5-year period; • Benthic survey vessel – 2-3 weeks within the 5-year period; and • General purpose vessel for the deployment and recovery of wave buoys and floating LiDAR systems. <p>This represents a negligible increase to shipping activity in the area.</p> <p>the vessel movements associated with the surveys will have no significant landscape, visual or socio-economic impacts. This remains the case even if all vessels were operating at the same time.</p>
				<p>Socio-economic; Marine ecology</p> <p>The Damage to seaweed growth and supporting industry section of this submission critiques the absence of information within the Natura Impact Statement with respect to macroalgal (kelp) communities, although ultimately poses a simple question regarding whether the kelp harvesting industry would be put at risk. This section also notes the absence of a climate change and carbon impact assessment, and makes reference to a similar chapter of the Pentland Floating Offshore Wind Farm EIA.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. A future consent application for the wind farm will have due regard to climate and carbon impacts.</p> <p>The emissions from the survey vessels are not significant in the context of shipping activity in Ireland and worldwide, and of other global GHG sources, therefore there will be no significant impact on climate and carbon emissions arising from the proposed survey activities.</p> <p>Due to the very minor footprint of the proposed site investigations, the surveys will have no significant impact on the local seaweed presence or harvesting industry.</p>
				<p>Legislative compliance</p> <p>The responder invites the Department to request that the Minister be mindful of the deficiency in the existing environmental assessments of the Sceirde Rocks Offshore Wind Farm, due to the potential for damage to the marine environment.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
				<p>Various</p> <p>The responder objects absolutely to the proposed construction of any large wind turbines at the Sceirde Rocks.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
PS8	FS007161	N/A	Anonymous	<p>Legislative compliance</p> <p>The responder seeks clarity on the extent of the survey area.</p>	<p>The survey area is as set out in the maps submitted with the application.</p>
				<p>Legislative compliance</p> <p>The responder queries why the following were not done:</p> <ul style="list-style-type: none"> - Publicising of the foreshore licence application more widely and encouraging and supporting engagement with the public consultation process - 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 	<p>Public consultation was carried out in accordance with the Foreshore Acts and European Communities (Birds and Natural Habitats) Regulations 2011.</p>

Legislative compliance	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.	The Applicant will comply with all relevant requirements.
Air quality	The responder notes that there is the potential for the survey works to impact the Mace Head research station's readings.	The surveys will have no significant impact on the operations of Mace Head. The applicant is in regular communication with the owners and operators of the Mace Head atmospheric research station. A future Environmental Impact Assessment (EIA) Report will be submitted with a development consent application for the construction and operation of the offshore wind farm.
Legislative compliance	The responder notes that the applicant is part of GIG; the applicant is applying to carry out survey works that are significant in scale; and has indicated a potential issue with the Applicant's capacity to deliver works effectively [with respect to risk and opportunity management]	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts, which the Applicant intends to undertake later in 2023. The Applicant has an experienced team developing the scope and contracts and management of proposed works and will work with survey contractors experienced in undertaking geotechnical and environmental surveys. The Applicant has been deemed suitable, under technical and financial criteria as part of Maritime Area Consent application process, to develop the site.
Marine ecology	The responder notes concern regarding impacts to kelp and seagrass in the survey area,	There is a very small seabed footprint associated with the proposed surveys. The nature of these surveys would mean that any impacts to kelp and seagrass would be very minor, with particular reference to the wider availability of suitable habitat.
Marine ecology	The responder notes concern regarding impacts on blue carbon sequestration from the geotechnical sampling.	Boreholes will be approx. 100 mm in diameter. The seabed footprint of 60 boreholes will be very minor. As a result, there will be no significant impacts on blue carbon sediments, habitats or rates of carbon sequestration. The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation. The Applicant has not consulted with the project team at BlueC.
Environmental	The responder queries how the Applicant intends to meet the requirement to ensure conservation, protection and recovery of marine biodiversity alongside the proposed survey works, with specific reference to a Climate Action Plan.	One of the key aims of the Climate Action Plan 2023 is to deliver 7 GW of offshore wind energy by 2030. This foreshore licence application is to undertake site investigation works that will inform a planning application for an offshore wind farm application of ca 450 MW, one of the first four offshore windfarm projects in the country to qualify under ORESS1, making it more likely to be in a position to contribute towards the Climate Action Plan targets. This application is aligned with the objectives of the Climate Action Plan. The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation. The Minister, is obliged, in so far as practicable, to perform his functions in a manner consistent with the most recent approved climate action plan, and must therefore take account of the CAP23 when reaching his decision to grant or refuse a Foreshore Licence.
Legislative compliance	The responder notes that it is impossible to consider the proposed survey works without considering the proposed wind farm for which the survey works are proposed. They state that the location and scale of the proposed wind farm is not appropriate for this area.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. A future Environmental Impact Assessment (EIA) Report will be submitted with a development permission application for the construction and operation of the offshore wind farm. The Sceirde Rocks project was designated as a Relevant Status development, and has been awarded a Maritime Area Consent by the Irish government.

				Legislative compliance	<p>The submission notes 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".</p> <p>They question why this Phase 1 project should be allowed to proceed simply by virtue of timing.</p>	<p>This is a matter for the Minister.</p>
				Legislative compliance	<p>The Responder asks why the assessment of impacts of the proposed survey works for the cable corridor and for the wind farm array area have not been considered jointly as part of one Foreshore Licence application?</p>	<p>This was done for project scheduling reasons.</p> <p>The applicant prepared a screening report for the purposes of Directive 2011/92/EC (the Environmental Impact Assessment ("EIA") Directive). This was submitted, together with an Environmental Assessment, as part of the Sceirde Rocks' Foreshore Licence application. It was concluded, in the EIA Screening Report, that the proposed site investigations:</p> <ul style="list-style-type: none"> • Do not fall under the description of activities included within Annex I or Annex II of the Directive; and • Are of such a nature, scale and location that there are no foreseeable significant effects on the environment arising from the proposed activities. <p>On that basis, the need for an EIA to be carried out in respect of the proposed site investigations can be screened out.</p> <p>An Appropriate Assessment Screening Report and Natura Impact Statement were submitted with the application, and which were prepared in compliance with the relevant provisions of the Habitats Directive and European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).</p> <p>The first application was considered as a cumulative impact with the second application and therefore has been fully assessed.</p>
PS9	FS007161	N/A	Anonymous	Various	Same content as PS8	
PS10	FS007161	N/A	Anonymous	Marine ecology	The responder opines that FS007161 should not be granted as it poses significant harm to a variety of protected fish, bird and marine mammal species.	Impacts to fish, birds and marine mammals were assessed in the Environmental Assessment, EIA Screening Report and Natura Impact Statement. No significant negative impacts were found.
				Marine ecology; Socio-economic	The proposed site investigation will damage this pristine coastline and the tourism upon which many locals depend	There is no evidence provided to support how the geotechnical and environmental surveys will damage this pristine coastline.
				Legislative compliance	The responder notes that it is impossible to consider the proposed survey works without considering the proposed wind farm for which the survey works are proposed. They state that the location and scale of the proposed wind farm is not appropriate for this area.	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. A future Environmental Impact Assessment (EIA) Report will be submitted with a development consent application for the construction and operation of the offshore wind farm.</p> <p>The Sceirde Rocks project was designated as a Relevant Status development, and has been awarded Maritime Area Consent by the Irish government.</p>

Scale	The responder notes that five years (duration of the Foreshore Licence) is neither short nor temporary.	The geotechnical and environmental surveys proposed under this Foreshore Licence application are being undertaken over a short campaign at the earliest opportunity. Further surveys may be required at limited times over future years. The period of five years is simply the validity of the licence, and not the duration of the survey works or predicted impacts.
Protected Sites	The responder notes that the area indicated in this application is surrounded by protected Natura 2000 sites and is within the Galway Bay and Islands Area of Interest, which are sensitive areas that cannot avoid being adversely affected by the survey procedures proposed.	<p>The Applicant has presented the Natura Impact Statement which has identified any Likely Significant Effects on the features of protected sites, to allow the Minister to appropriately assess whether the proposed survey will have adverse effects on the integrity of those sites.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
Fish	Haddock and Atlantic haddock spawning and nursery areas lie within or adjacent to the proposed site of the boreholes. Any impacts will be negative.	The information provided in our Environmental Assessment and EIA Screening Report demonstrates that any disruption from survey activity will be short term, temporary and not significant on both fishing activity and fish ecology.
Marine mammals	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.	Noted. This information reflects that in the Natura Impact Statement.
Marine mammals	The responder disputes the conclusion in the Natura Impact Statement that bottlenose dolphins from the various Irish SACs will not be adversely affected. They disagree because there is a local bottlenose dolphin population within the site investigation area, and advise that Galway Bay should be considered as an SAC for bottlenose dolphin.	<p>The Applicant has noted in the Natura Impact Statement that, in view of the best available scientific knowledge there will be no adverse effects (alone or in combination with other plans or projects) on those bottlenose dolphin SACs listed by the responder, or on the integrity of any other European site.</p> <p>The Applicant recognises its obligations not to harm protected (Annex IV) species under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011.</p> <p>It is not for FST to propose or designate Special Areas of Conservation.</p>
Marine mammals	The responder advises that the significant noise and seabed disturbance from the proposed site investigation activities poses a risk to this locally occurring dolphin population.	<p>The Applicant has noted in the Natura Impact Statement that, in view of the best available scientific knowledge there will be no adverse effects (alone or in combination with other plans or projects) on those bottlenose dolphin SACs listed by the responder, or on the integrity of any other European site.</p> <p>The <i>Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters</i> (Department of Arts, Heritage and the Gaeltacht (DAHG), 2014) will be followed at all times for all site investigation activities.</p> <p>In addition, the Applicant recognises its obligations not to harm protected (Annex IV) species under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011.</p>

				<p>Marine mammals</p> <p>The responder discusses underwater sound sources proposed as part of this Foreshore Licence application.</p> <p>They make reference to the Irish Whale and Dolphin Group Offshore Wind Farm Policy Document.</p> <p>This document lists mitigation measures to prevent adverse impacts to marine mammals.</p>	<p>The Applicant has assessed potential impacts of underwater sound on marine mammals, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement.</p> <p>The Applicant will implement measures to mitigate injury risk to marine mammals, in line with the <i>Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters</i> (DAHG), 2014). The appropriate mitigation measures have been addressed in the Natura Impact Statement.</p>
				<p>Legislative compliance</p> <p>The responder advises that the Irish government should require all wind farm developers to abide by the marine mammal protection recommendations in the IWDG Offshore Wind Farm Policy Document.</p>	<p>The Applicant reiterates that they have taken a proportionate approach to mitigating the risk to marine mammals resulting from this survey.</p>
				<p>Marine mammals</p> <p>The responder makes similar points with respect to grey seal and harbour seal (and their respective SACs in the west of Ireland).</p>	<p>The Applicant has assessed potential impacts of underwater sound on marine mammals, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to adverse effects on the integrity of sites designated for those species.</p> <p>The Applicant will implement measures to mitigate injury risk to marine mammals. However, noting the other content of the IWDG report, the Applicant notes that mitigation measures should be proportionate to the risk, to (1) avoid adverse effects on the integrity of marine mammal protected sites, and (2) avoid death, injury or disturbance to protected species.</p>

PS11	FS007161	N/A	Anonymous	Various	<p>The responder would like to object to the Foreshore Licence application, on the grounds that:</p> <p>(1) The offshore wind farm should not go ahead</p> <p>(2) The wind farm would destroy large sections of shallow reef between Oilean Mhic Dara and Sceirde Rocks</p> <p>(3) The applicant has presented misleading information regarding turbine size</p> <p>(4) There will be a damaging effect on the bottlenose dolphin</p> <p>(5) Insufficient transparency with the public as to the scale of the Sceirde Rocks Offshore Wind Farm</p> <p>(6) Mace Head Atmospheric Research Station would have to cease operations</p>	<p>The majority of this response relates to the Sceirde Rocks offshore wind farm.</p> <p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts.</p> <p>This is not an application to construct the Sceirde Rocks wind farm.</p> <p>A future Environmental Impact Assessment (EIA) Report will be submitted with a development consent application for the construction and operation of the offshore wind farm.</p> <p>(1) This representation does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p> <p>(2) This representation does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p> <p>(3) This representation does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p> <p>(4) The Applicant has assessed potential impacts and has presented the Natura Impact Statement, and the justification by the Applicant that while the proposed site investigations could be likely to have significant effects on bottlenose dolphins (and other marine mammal species) associated with SACs, the impacts would be short term and transient, and in their assessment would not lead to adverse effects on the integrity of those sites.</p> <p>(5) The Applicant provided hard copies of the application documents in multiple locations for consultation as instructed and approved by the Department, including Clifden and Kilkee public libraries, Clifden, Carna and Kilrush garda stations and Galway and Clare County Council offices, with all documents also available online. Information about the consultation was included in very large notices in two local and one national newspaper on three separate occasions. .</p> <p>(6) The survey would have no significant impact on the operations at Mace Head.</p>
PS12	FS007161	N/A	Anonymous	<p>Biodiversity</p> <p>Cultural</p>	<p>The response references significant concerns about the potential negative impacts of the propose development [on] biodiversity. The responder goes on to make reference to the national/international biodiversity crisis, and refers to EU goals to keep nature, sea and land in a healthy state,</p> <p>The responder states that as the application was only in English, the rights and knowledge (including traditional knowledge) of indigenous people and the local community are not recognised and respected, which undermines the right to full participation of the community in public consultations conducted in the native (Irish) language.</p>	<p>The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p> <p>The Applicant continues to adhere to the rigorous demands of the Irish offshore wind consenting regime, with due regard to the environment, social and economic impacts, and will do so in accordance with national legislation .</p> <p>A future Environmental Impact Assessment (EIA) Report will be submitted with a development permission application for the construction and operation of the offshore wind farm.</p> <p>The Applicant is very respectful of the cultural status of the local community and use of the Irish language and supportive of its continued use and development. The Applicant was advised by the Department on the most appropriate balance of translation and printing and would have been happy to discuss any additional requirements if requested.</p>
PS13	FS007161	N/A	Anonymous	Scale	<p>The responder is concerned about the scale of the offshore wind farm project so close to shore.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>

				Visual	The responder makes reference to a United Kingdom DTI study on thresholds for seascapes (Wratten et al., 2005), and states that the wind farm being < 5 km from shore is "far too close", contrary to international best practice and that the scale of the development will have a very major visual impact.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Noise	The responder also expresses concern about the noise from the wind turbines affecting houses close to the sea.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Marine ecology	The responder states that site investigation [taken as being the works proposed under FS007161] would cause major disruption to the sea bed and all living creatures.	The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.
				Socio-economic; Biodiversity	Biodiversity loss is as important an issue as climate change. Biodiversity needs to be protected along with stunning seascapes, tourism and local fishing economy.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Engineering	Other options are 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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS14	FS007161	Coastal Concern Alliance	Anonymous	Scale	The responder ask why, almost twenty years after the first objections to a wind farm at the Sceirde Rocks site, 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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Legislative compliance	The responder criticises the process of selection of 'Relevant Projects'.	This representation is directed at the Irish government, not the Applicant.

Legislative compliance	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.	<p>The FSL is for survey activity only and not the construction/operation of the offshore wind farm.</p> <p>This was done for project scheduling reasons.</p> <p>The applicant prepared a screening report for the purposes of Directive 2011/92/EC (the Environmental Impact Assessment ("EIA") Directive). This was submitted, together with an Environmental Assessment, as part of the Sceirde Rocks' Foreshore Licence application. It was concluded, in the EIA Screening Report, that the proposed site investigations:</p> <ul style="list-style-type: none"> • Do not fall under the description of activities included within Annex I or Annex II of the Directive; and • Are of such a nature, scale and location that there are no foreseeable significant effects on the environment arising from the proposed activities. <p>On that basis, the need for an EIA to be carried out in respect of the proposed site investigations can be screened out.</p> <p>An Appropriate Assessment Screening Report and Natura Impact Statement were submitted with the application, and which were prepared in compliance with the relevant provisions of the Habitats Directive and European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).</p> <p>The first application was considered as a cumulative impact with the second application and therefore has been fully assessed.</p>
Legislative compliance	The site area is expanded very significantly from the area granted 'relevant' project status in May 2020	The "Relevant Project" is the wind farm, whereas this application seeks a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts, across a larger area to better understand the wider environment.
Legislative compliance	The responder criticises the decision to award the project "Relevant" status (points 3, 4, 5 and 6)	This representation is directed at the Irish government, not the Applicant.
Legislative compliance	The responder claims that the granting of Maritime Area Consent is flawed.	This representation is directed at the Irish government, not the Applicant.
Legislative compliance	The responder claims that no application has been subject to Strategic Environmental Assessment.	With respect to this application, the Strategic Environmental Assessment Directive is not relevant because the proposed surveys are an Activity, not a Plan or a Programme.
Marine ecology	The responder states that the proposed area of site investigation spans numerous Natura 2000 sites, protected under the Habitats Directive.	<p>The Applicant has confirmed that no intrusive survey work will take place within an SAC or SPA. The assessments provided in the Natura Impact Statement demonstrates that survey work outwith the designated sites will have no significant effect on the qualifying features of designated sites in the vicinity of the survey work. These assessments were undertaken by independent experts with decades of experience in environmental assessments and the interaction of survey works such as these with designated sites. Therefore the Applicant is confident in the robustness of the assessments provided..</p> <p>The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p>
Marine ecology; Fisheries	The responder states that this is a rich shellfish spawning and fishing ground and is totally unsuitable for any industrial intrusion into the environment.	The information provided in the Applicant's Environmental Assessment and EIA Screening Report demonstrates that any disruption from survey activity will be short term, temporary and not significant on both fishing activity and fish ecology.

				Cultural	The responder states that the site is an important Heritage Area, unsuitable for disturbance, including that which is proposed in the current licence applications.	<p>The Applicant continues to adhere to the rigorous demands of the Irish offshore wind consenting regime, with due regard to the environment, social and economic impacts, and will do so in accordance with national legislation requiring public consultation.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
				Cultural	The responder states that the site is an important area for tourism and is unsuitable for development.	<p>It is assumed that this relates to the wind farm, and not the site investigation surveys.</p> <p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts.</p> <p>This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
				Legislative compliance	The responder levels criticism at the Department for this application being in relation to site-investigation-only. Given the risk of legal challenge, the responder claims that this risk (to the taxpayer) should be carefully assessed.	This submission is directed at the Irish government, not the Applicant.
				Air quality	The responder claims that the wind farm will impact Mace Head atmospheric monitoring.	The survey will have no significant impact on the operations at Mace Head.
				Visual	The responder challenges the proximity to shore of the wind farm.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS15	FS007161	Wild Ireland Defence CLG	Anonymous	Biodiversity	The responder states that 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.	<p>The FSL is for survey activity only and not the construction/operation of the offshore wind farm.</p> <p>The Applicant has submitted its application in compliance with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
				Biodiversity	<p>The responder requests that:</p> <p>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,</p> <p>ii) competent authorities ensure their observations, examinations, assessments, and determinations are consistent with their responsibilities under environmental protection law, and</p> <p>iii) competent authorities demonstrate the precautionary principle.</p>	This representation is directed at the Irish government and the Department, not the Applicant. The Applicant has submitted its application in compliance with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contains sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.
PS16	FS007161	N/A	Anonymous	Various	Same content as PS13	
PS17	FS007161	N/A	Anonymous	Various	Same content as PS13	

PS18	FS007161	N/A	Anonymous	Various	Same content as PS13	
PS19	FS007161	Iascairí Sceirde	Anonymous	Protected Sites	The responders 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. They consider that the potential for an adverse impact on the integrity of European Sites has not been excluded beyond a reasonable scientific doubt.	The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.
				Protected Sites	Inis Mór SAC The responder states that 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.	The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.
				Protected Sites	Kilkieran Bay and Islands SAC The responder states that 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 responder also states that 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.	The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species. One proposed geotechnical sampling method is vibratory coring (known as vibro coring). Vibro coring involves an oscillating motor attached to the core barrel which causes localised liquefaction in the sediments along the core barrel surface, which allows the core barrel to penetrate easier into the sediment. Vibro coring is not considered to be a particularly noisy activity, although sound associated with vibro coring would likely be audible above the sound of the vessel that the rig is deployed from (e.g. 180-190 dB (rms) re 1 micropascal @ 1 metre). Any impacts from sound generated during vibro coring will be short-lived due to the nature of how vibro coring rigs operate, i.e. short, intermittent pulses of vibration. This activity will not cause any long term significant environmental effects. In terms of physical vibrations, the short pulses of vibration will transfer through the core barrel into the sediment, but will not have an impact beyond the immediate vicinity of the coring operations as the energy dissipates through the sediment. Benthic and geotechnical survey sampling will also cause a small amount of sediment to become suspended in the water and subsequently dispersed and deposited on the seabed at a location depending on wave and tidal conditions. However, any deposition of material will be insignificant compared to baseline levels of sediment movement within the Foreshore Licence Area. In addition, equipment required or installed as part of the site investigation activities will not cause any physical obstruction or cause any potential alteration to the natural physical processes (water and sediment movement) of any designated site. The Applicant does not agree that the NIS has not taken relevant impact pathways into account. The information provided in the environmental assessments has demonstrated that there will be no significant impact on fish from underwater noise, disturbance to seabed or discharges to sea.

Protected Sites	<p>Slyne Head Islands SAC</p> <p>The responder states that 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, and that the disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected grey seals.</p> <p>They also state that the disruption of shoals of fish from the invasive boring and noise may disrupt the feeding patterns of protected bottlenose dolphins, and that 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.</p>	<p>The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p> <p>The Applicant does not agree that the NIS has not taken relevant impact pathways into account.</p> <p>The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
Protected Sites	<p>Slyne Head to Ardmore Point Islands SPA</p> <p>The responder states that barnacle 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.</p> <p>They also state that 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 breeding success and migration.</p>	<p>The Applicant has assessed potential impacts on biodiversity, and has presented this within the Environmental Assessment, EIA Screening Report and Natura Impact Statement. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p> <p>The Applicant does not agree that the NIS has not taken relevant impact pathways into account.</p> <p>The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
Protected Sites	<p>The responder states that 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.</p>	<p>The Applicant has confirmed that no intrusive survey work will take place within an SAC or SPA. The assessments provided in the Report to Inform Appropriate Assessment and Natura Impact Statement demonstrates that survey work outwith the designated sites will have no significant effect on the qualifying features of designated sites in the vicinity of the survey work. These assessments were undertaken by independent experts with decades of experience in environmental assessments and the interaction of survey works such as these with designated sites. Therefore the Applicant is confident in the robustness of the assessments provided.</p>
Protected Sites; Biodiversity	<p>The responder states that 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.</p>	<p>The investigations proposed as part of this survey have been assessed in the EIA screening and Natura Impact Statement</p> <p>The statement about in-combination effects of this development with other plans/projects will cause significant issues for the marine environment, is conjecture and not backed up with substantive evidence. This has been assessed in the Natura Impact Statement, which found there would be no adverse effects on any European site.</p>

Survey	<p>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. 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.</p>	<p>It is not common practice that exact sampling locations are known at this point. Indicative survey locations is a common approach to FSL applications with exact locations confirmed at a later date. All locations will be within the FSL area.</p> <p>The following measures will be taken to avoid or reduce any potential impacts on the seabed:</p> <ul style="list-style-type: none"> • There will be no geotechnical or benthic sampling undertaken within SACs or SPAs. • A drop-down underwater camera or ROV will be used at each benthic sampling station and the grab will only be deployed if soft sediments are present, thereby avoiding damage to any potential rocky reef habitats. • The photographic equipment itself will not contact the seabed, therefore no protected reefs will be impacted by this activity. • The geotechnical boring and CPT equipment will be accurately positioned on the seabed at each pre-determined location where safe and practicable to do so, reducing any seabed impacts where possible. • All deployment and recovery activities will be undertaken as per pre-determined procedures. <p>The CJEU has held that the competent authority is permitted to grant consent which leaves the developer free to determine subsequently certain parameters – including ultimate locations - provided that the authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site. In this instance, no development consent is being granted. Rather, a foreshore licence application is sought in relation to surveys which involve geotechnical, geophysical, metocean and environmental surveys which include drop-down videography, high-resolution acoustic imaging, sediment sampling and mooring deployment, each with short duration, temporary and transient impacts on the marine environment which have been described and assessed in the EIA Screening Report and Natura Impact Statement.</p>
Legislative compliance	<p>The responder states that 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.</p>	<p>The NIS has concluded that there will be no adverse impact on any European Sites. There will be no drilling / sampling within any European Sites. Nonetheless, as a matter of good practice, the geophysical surveys will be carried out to ensure that any relevant information can be taken into account in advance of carrying out the geotechnical surveys.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
Marine ecology	<p>The responder states that the applicant fails 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.</p>	<p>The question of whether development is exempt or not is a land use planning matter under the Planning and Development Acts 2000 – 2022 and the Planning and Development Regulations 2001 – 2022. This is a Foreshore Licence application under the Foreshore Act 1924, as amended, and exempted development is not applicable.</p> <p>The Applicant disagrees with this submission: geotechnical sampling is for the purposes of site investigation within the proposed wind farm array area and cable route. Information gained from these surveys will be used to inform a future application for consent for the Sceirde Rocks offshore wind farm. Any drilling (or other forms of coring) are not for the purposes of "mineral extraction" other than to assess ground conditions.</p>

Engineering	The specific coring fluids have not been identified and details relating to the discharge of cuttings are unclear.	<p>All proposed coring fluid products are rated as PLONOR (posing little or no risk to the environment). Possible fluids are seawater only; organic, biodegradable high performance water-based mud (HPWBM); or bentonite, sometimes mixed with soda ash.</p> <p>Only minimal amounts of cuttings will be discharged because 80 - 90% of the core is recovered for analysis. Cuttings are discharged and will settle close to the seabed and are estimated to amount to <0.25 m³ per borehole.</p>
Marine mammals	The submission acknowledges that the Applicant and the Minister are aware of the large number of dolphins, whales and cetaceans in this area, and states that this high frequency type of surveying will cause significant damage to Annex II species	<p>The Natura Impact Statement presents the assessment of the impact of the proposed site investigation activities on European sites, both alone and in combination with other plans and projects. This assessment included consideration of geophysical surveys using various acoustic sound sources operating at a range of frequencies. The Natura Impact Statement concludes that in light of the best available scientific knowledge, the site investigation activities would have no adverse effects on the integrity of any European site, including those with dolphin and porpoise qualifying features.</p> <p>The Applicant will implement measures to mitigate injury risk to marine mammals, in line with the Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (DAHG), 2014).</p>
Marine ecology	<p>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 the there should be public and prescribed consultation in relation to the information gathered.</p> <p>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.</p>	<p>The NIS has concluded that there will be no adverse impact on any European Sites. There will be no drilling / sampling within any European Sites. Nonetheless, as a matter of good practice, the geophysical surveys will be carried out to ensure that any relevant information can be taken into account in advance of carrying out the geotechnical surveys.</p> <p>Representative examples of geophysical survey equipment have been assessed. These types of equipment were selected to represent a realistic worst-case example of sub-bottom profiler and ultra-short baseline acoustic equipment. Underwater sound impacts associated with these types of equipment have been assessed.</p>
Fishing	The responder states that the Applicant 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.	<p>The Applicant met with this group and others on many occasions in 2022 and entered agreements that facilitated the completion of certain surveys in 2022. The Applicant is engaged in a similar process with this group and others for proposed surveys in 2023.</p> <p>It is for the Department to consider and include licence conditions as they determine necessary.</p>

				Various	<p>The responder does not accept the conclusions that the best scientific information has been put forward and adequately assessed in this application, and does 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.</p>	<p>The Applicant appointed a team of environmental experts to conduct the assessments presented in the Environmental Report, EIA Screening Report and Natura Impact Statement. These documents detail the assessment of potential impacts on biodiversity based on the best available scientific evidence. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p> <p>The Applicant continues to adhere to the rigorous demands of the Irish offshore wind consenting regime, with due regard to the environment, social and economic impacts, and will do so in accordance with national legislation requiring public consultation.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
				Various	<p>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.</p>	<p>This submission is directed at the Minister/Irish government, not the Applicant.</p>
PS20	FS007161	Breizon Limited	Anonymous	Fishing; Socio-economic	<p>The responder is critical of the Applicant, in that they received no compensation for loss of revenue suffered as a result of the 2022 [geophysical] surveys, which required fishers to remove their gear from the survey area to facilitate the movement of survey vessels, resulting in loss of marketable goods for Breizon Limited.</p>	<p>The question of compensation is not relevant to the determination of a foreshore licence application.</p>
				Fishing; Socio-economic	<p>The responder has received correspondence from the Applicant's Solicitor confirming that our losses will not be dealt with in relation to the 2022 survey activity.</p>	<p>The question of compensation is not relevant to the determination of a foreshore licence application.</p>
				Marine ecology; Protected sites	<p>The responder has 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.</p>	<p>The Applicant appointed a team of environmental experts to conduct the assessments presented in the Environmental Report, EIA Screening Report and Natura Impact Statement. These documents detail the assessment of potential impacts on biodiversity based on the best available scientific evidence. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p>
PS21	FS007161	Cumann Iascairi Oileán Árann	Anonymous	Fishing	<p>Submission against FS007161 is identical to FS007543</p>	<p>Noted.</p>

Marine ecology	The in-combination effect of this development will cause significant issues for the marine environment and biodiversity in the area.	<p>The statement about in-combination effects of this development with other plans/projects will cause adverse effects on the marine environment, is conjecture and not backed up with substantive evidence.</p> <p>Information to support these conclusions is presented in the cumulative and in-combination effects assessments in the EIA Screening Report and Natura Impact Statement</p>
Marine ecology	<p>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. 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.</p>	<p>It is not common practice that exact sampling locations are known at this point. Indicative survey locations is a common approach to FSL applications with exact locations confirmed at a later date. All locations will be within the FSL area.</p> <p>The following measures will be taken to avoid or reduce any potential impacts on the seabed:</p> <ul style="list-style-type: none"> • There will be no geotechnical or benthic sampling undertaken within SACs or SPAs. • A drop-down underwater camera or ROV will be used at each benthic sampling station and the grab will only be deployed if soft sediments are present, thereby avoiding damage to any potential rocky reef habitats. • The photographic equipment itself will not contact the seabed, therefore no protected reefs will be impacted by this activity. • The geotechnical boring and CPT equipment will be accurately positioned on the seabed at each pre-determined location where safe and practicable to do so, reducing any seabed impacts where possible. • All deployment and recovery activities will be undertaken as per pre-determined procedures. <p>The CJEU has held that the competent authority is permitted to grant consent which leaves the developer free to determine subsequently certain parameters – including ultimate locations – provided that the authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site. In this instance, no development consent is being granted. Rather, a foreshore licence application is sought in relation to surveys which involve geotechnical, geophysical, metocean and environmental surveys which include drop-down videography, high-resolution acoustic imaging, sediment sampling and mooring deployment, each with short duration, temporary and transient impacts on the marine environment which have been described and assessed in the EIA Screening Report and Natura Impact Statement.</p>
Legislative compliance	The responder states that 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.	<p>The NIS has concluded that there will be no adverse impact on any European Sites. There will be no drilling / sampling within any European Sites. Nonetheless, as a matter of good practice, the geophysical surveys will be carried out to ensure that any relevant information can be taken into account in advance of carrying out the geotechnical surveys.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
Marine ecology	The responder states that the applicant fails 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.	<p>The question of whether development is exempt or not is a land use planning matter under the Planning and Development Acts 2000 – 2022 and the Planning and Development Regulations 2001 – 2022. This is a Foreshore Licence application under the Foreshore Act 1924, as amended, and exempted development is not applicable.</p> <p>The Applicant disagrees with this submission: geotechnical sampling is for the purposes of site investigation within the proposed wind farm array area and cable route. Information gained from these surveys will be used to inform a future application for consent for the Sceirde Rocks offshore wind farm. Any drilling (or other forms of coring) are not for the purposes of “mineral extraction” other than to assess ground conditions.</p>

Engineering	The specific coring fluids have not been identified and details relating to the discharge of cuttings are unclear.	<p>All proposed coring fluid products are rated as PLONOR (posing little or no risk to the environment). Possible fluids are seawater only; organic, biodegradable high performance water-based mud (HPWBM); or bentonite, sometimes mixed with soda ash.</p> <p>Only minimal amounts of cuttings will be discharged because 80 - 90% of the core is recovered for analysis. Cuttings are discharged and will settle close to the seabed and are estimated to amount to <0.25 m³ per borehole.</p>
Marine mammals	The submission acknowledges that the Applicant and the Minister are aware of the large number of dolphins, whales and cetaceans in this area, and states that this high frequency type of surveying will cause significant damage to Annex II species	<p>The Natura Impact Statement presents the assessment of the impact of the proposed site investigation activities on European sites, both alone and in combination with other plans and projects. This assessment included consideration of geophysical surveys using various acoustic sound sources operating at a range of frequencies. The Natura Impact Statement concludes that in light of the best available scientific knowledge, the site investigation activities would have no adverse effects on the integrity of any European site, including those with dolphin and porpoise qualifying features.</p> <p>The Applicant will implement measures to mitigate injury risk to marine mammals, in line with the Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (DAHG), 2014).</p>
Marine ecology	<p>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 the there should be public and prescribed consultation in relation to the information gathered.</p> <p>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.</p>	<p>The NIS has concluded that there will be no adverse impact on any European Sites. There will be no drilling / sampling within any European Sites. Nonetheless, as a matter of good practice, the geophysical surveys will be carried out to ensure that any relevant information can be taken into account in advance of carrying out the geotechnical surveys.</p> <p>Representative examples of geophysical survey equipment have been assessed. These types of equipment were selected to represent a realistic worst-case example of sub-bottom profiler and ultra-short baseline acoustic equipment. Underwater sound impacts associated with these types of equipment have been assessed.</p>
Fishing	The responder states that the Applicant 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.	<p>The Applicant completed geophysical surveys in 2022 with no significant issues raised.</p> <p>It is for the Department to consider and include licence conditions as they determine necessary.</p>

				Various	<p>The responder does not accept the conclusions that the best scientific information has been put forward and adequately assessed in this application, and does 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.</p>	<p>The Applicant appointed a team of environmental experts to conduct the assessments presented in the Environmental Report, EIA Screening Report and Natura Impact Statement. These documents detail the assessment of potential impacts on biodiversity based on the best available scientific evidence. The impacts resulting from this proposed survey have been assessed as being short term and transient, and in the Applicant's assessment they would not lead to significant impacts on species and habitats, nor will they have adverse effects on the integrity of Natura (European) protected sites designated for conservation of habitats and species.</p> <p>The Applicant continues to adhere to the rigorous demands of the Irish offshore wind consenting regime, with due regard to the environment, social and economic impacts, and will do so in accordance with national legislation requiring public consultation.</p> <p>The Applicant has complied with the Foreshore Acts and all relevant environmental legislation and the application is being made subject to public consultation. The application contain sufficient information in order to enable the Minister to undertake the relevant assessments required under this legislation.</p>
				Various	<p>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.</p>	<p>This submission is directed at the Minister/Irish government, not the Applicant.</p>
PS22	FS007161	N/A	Anonymous	Visual; Biodiversity	<p>The responder states that 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.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
				Fishing	<p>The wind farm would cause 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.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
PS23	FS007161	N/A	Anonymous	Visual	<p>There has been a 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 lorras Aithneach and Muigh-Inis area in particular.</p>	<p>This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.</p>
				Various	<p>The opinions of the people are not being taken into account by the Department of Housing, Local Government, and Heritage.</p>	<p>This representation is directed at the Department, not the Applicant.</p>

				Socio-economic; Marine ecology	The responder has 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.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
				Human health	The responder has concerns about the impact this [wind farm] project will have on my own mental well-being and the mental well-being of the community in Carna.	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS24	FS007161	N/A	Anonymous	Various	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	This is an application for a Foreshore Licence for geotechnical and environmental site investigations under the Foreshore Acts. This is not an application to construct the Sceirde Rocks wind farm. This submission does not make reference to the impact of the proposed activities for which the Applicant is seeking a Foreshore Licence.
PS25	FS007161	N/A	Anonymous	Various	Same content as PS13	
PS26	FS007161	N/A	Anonymous	Various	Same content as PS23	