

foreshore

From: Kate Dempsey <imsc@outlook.ie>
Sent: 04 February 2018 17:10
To: foreshore
Subject: Re: FS006788 Hibernian Windfarm Kilmichael Point, Wexford

Dear Sirs,

Thank you for your correspondence of the 18th ult. I can confirm that despite your forwarding my correspondence to the applicant and a follow up email direct from Irish Mussel Seed Company Limited, I am yet to receive any contact or correspondence from Hibernian Wind Power.

Therefore, I am now lodging an objection to the proposed foreshore licence on the grounds that Irish Mussel Seed Company's licence application Ref: T32/27 as noted at section 2.8 will be directly affected by this foreshore proposal;

"The Department of Agriculture, Food and the Marine are processing an Aquaculture Application (T32/27) for an offshore mussel spat collection Smart Farm that is located within the northern section of the proposed Study Area. See drawing number QA-000247-01-D460-002"

Other reasons for objection are as follows;

This Foreshore Licence application has assumed that the area in which it seeks to investigate is not a fish spawning area. Unfortunately this is not the case. Wicklow and Wexford are historically the fishing ground for mussel seed and therefore mussel spawn in large volume in the area. The ongrowing industry depend on this seed to sustain their businesses. Irish Mussel Seed Company wishes to harness this mussel seed and without any evidence of the Environment Impact of the proposed action of Hibernian Wind Power are unable to agree to the proposed foreshore licence. Irish Mussel Seed Company must act to protect the production of shellfish in this area.

As per the maps provided in this application there is heightened activity in the direct vicinity of application T32/27 and without confirmation of the impact of such work or consultation of any kind in relation to this project Irish Mussel Seed Company Limited object to the Foreshore Licence as a whole.

The time frames and dates for works carried out are not sufficiently clarified. From reading this application it seems to be for a period of three years and in such circumstances may prevent the future development of aquaculture which is a viable option in the zones set out by Hibernian Wind Energy. An aquaculture licence

is for exclusive use of an area to the exclusion of any other activity. Other activities however can greatly impact the availability of larvae and instillations can change water patterns all of which will need to be clarified in advance of this licence being issued.

Aquaculture will be adversely affected by the grant of this foreshore licence despite the applicant stating otherwise in their application. Due diligence was not carried out in respect of other sea users and consultation was not had. Therefore Hibernian Wind Power cannot possibly understand the impact that they will have on other sea users and other sea users cannot possibly understand the effect of the works proposed on their businesses. This is true in the case of Irish Mussel Seed Company.

The Applicant has stated the relevant Local Authority is Wexford County Council however this application covers both Wexford and Wicklow as it stretches as far north as Arklow.

Irish Mussel Seed Company wishes to understand the dates for the proposed works in more detail before commenting further but object on the grounds that same has not been provided.

There is no evidence of the impact on any species from the works proposed which may affect other sea users including Irish Mussel Seed Company and local fishing activity. A concern is the displacement of sediment as a result of the vibrocoring and cone penetration testing. This concern is justified by the considerable academic research into effects of sediment displacement on *Mytilus Edulis* otherwise commonly known as blue mussel which are found in the area proposed. In report entitled *The Behavioural Response of the Mussels to sudden burial by Sediment* by Zoe L. Hutchison et al outlines the effects of sediment on bottom grown mussel and noted significant mortality being observed.

I believe that there is a place for both wind energy and aquaculture and if the issues heretofore are clarified to the satisfaction of Irish Mussel Seed Company I would be happy to withdraw my objection.

At this point in time, for the reasons set out above and for the protection of the future of my business Irish Mussel Seed Company Limited I now formally object to this application and look forward to my concerns being addressed.

Yours Sincerely

Kate Dempsey

Irish Mussel Seed Company Limited

0851367600

**South East Regional Inshore Fisheries Forum**

Marine Planning and Foreshore Section,

Department of Housing, Planning, and Local Government, Newtown Road, Wexford, Co. Wexford

09th February 2018

Re: Foreshore Application on behalf of Hibernian Wind Power for Site investigation Works for an Offshore Windfarm in the vicinity of Kilmichael Point, County Wexford

Dear Sir/Madam,

The above application for a Foreshore Application has been circulated to the South East Regional Inshore Fisheries Forum RIFF by BIM for our input/comment. We have circulated the information to some relevant local inshore fishermen for feedback.

We therefore wish to make the following observations;

- The following inshore fisheries take place within the area indicated;
 - Whelk, which is the main inshore fishery is carried out by boats fishing out of Arklow, Courtown, and Wexford. The area is fished by moving whelk pots placed on the seabed throughout the season.
 - Razor clams are fished by dredge on occasion in the vicinity of the proposed area.
- Concern is expressed by fishermen as to the actual location of the wind turbines themselves. This is not clear from the documentation available, and this could potentially restrict the ability to fish the area, both during the construction period and long-term, especially if exclusion zones are imposed. The drawings from what can be seen show the locations for tidal monitoring equipment etc. but not the actual wind turbine locations (possibly not yet decided?). Concern is also expressed about the placement of the cables to bring power ashore from the windfarm, regarding depth of the cables in the seabed, their danger to fishing by way of entanglement with fishing gear, and if there will be need for exclusion zones around the cables leading to potential losses of fishing grounds.
- There appears to be an extensive array of survey techniques, which can be confusing to fishermen not familiar with many of them. We would recommend that a process be facilitated to brief fishermen on all techniques to be deployed. The SE RIFF can facilitate contact details for arranging to meet fishermen etc.
- One main survey technique stated, which is of serious concern to fishermen mentioned in the Revised application is that at of 'SEISMIC SOUND SOURCE – APPLIED ACOUSTICS



BOOMER PLATE'. Serious concern is expressed that seismic surveys can have a detrimental impact on fishing for species such as Whelk and crab, where such species are believed to leave the area (fear for both a temporary and permanent impact on fishing catch rates). During a recent/previous study (summer 2017) using seismic techniques, a local pot fisherman based in Rosslare noted a 2/3rd reduction in catch rates of whelk for a period of 4-5 weeks. Another fisherman fishing south of Dunmore East also had a substantial reduction in whitefish catches during the same survey. Both of the above reductions in catch rates were despite close co-ordination between the survey company and local fishermen endeavouring to avoid/minimise any impact on fishing.

One of the main seafood processing companies based in the southeast has expressed serious concern to any such substantial reductions in landings of any species. Any gap in meeting market demand that has been built up over many years, by a forced stop in supply (resulting from any activity) could mean the loss of such markets to processors (as happened previously before with the scallop market due to other reasons, where it took years to regain markets lost). Whelk is a key species for this processor who is one of the main Irish exporters of whelk.

- Concern is also expressed concerning chemical testing - more details are required
- Concerned is expressed by fishermen, in particular whelk, as to potential damage to their fishing gear during the survey period as the submitted drawings/charts show an intensive amount of survey points. As there will be undoubtedly be a need for fishermen to move their gear, to avoid collisions (fishing gear being towed/damaged etc.) there will be need to be a high level of consultation and co-ordination to minimise impacts, including loss of fishing time. An agreed liaison officer between the survey company and the fishermen will be required, due to weather and tidal conditions. Depending on Marine Notices and informing statutory bodies such as the SFPA will not be sufficiently timely or adequate.

In summary the SE RIFF recommends that the fishermen that fish the proposed survey area be met by the applicants, and the full extent of the survey techniques be outlined/explained, and the likely position of the actual wind turbines proposed including details for the cables be also outlined.

The South East RIFF is happy to facilitate the applicants with local relevant fishing contacts for arranging to meet them as proposed above.

Regards,

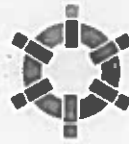
Trudy McIntyre,
Chair South East RIFF.
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087 1225636

John Hickey
BIM and SE RIFF Secretariat
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087 6295047

Please see the note on the following page regarding the role/function etc. of the South East RIFF



Inshore Fisheries Forums
Fóraim Iascaigh Cois Cladaigh

Role/function etc. of the South East RIFF

The South East Regional Inshore Fisheries Forum (RIFF) is one of 6 regional Inshore Fisheries consultative forums, at which members are representative of the 'inshore sector' fishermen using boats of less than 12m in overall length.

Established in May 2014 the National Inshore Fisheries Forum has been set up to facilitate the development of a coherent inshore sector "voice" by encouraging fishermen to discuss their fishing issues and generate commonly supported initiatives. The National Inshore Fisheries Forum (NIFF) is supported by a network of Regional Inshore Fisheries Forums (RIFFs) based on and linked to the community led Fisheries Local Action Groups (FLAGs) around the coast of Ireland. They have nominated delegates to bring forward regional proposals to NIFF for wider industry discussion. The RIFF members include inshore fishermen, environmental interests, marine leisure, marine tourism, processors (seafood added value) and other marine stakeholders.

The Inshore Fisheries Forums are facilitated by the statutory bodies responsible for marine fisheries in Ireland, namely Department of Agriculture, Food and the Marine, Bord Iascaigh Mhara, Sea Fisheries Protection Agency and the Marine Institute. Bord Iascaigh Mhara provides administrative support to the forums.

The South East RIFF covers the inshore coastal area of counties Wicklow, Wexford and Waterford. Further information concerning the South East RIFF and RIFFs in general can be obtained at http://inshoreforums.ie/?page_id=56 and <http://inshoreforums.ie/>

Shirley Kennedy

SUBMISSION 3

From: foreshore
Sent: 23 February 2018 16:45
To: Shirley Kennedy
Subject: FW: Foreshore license application FS006788

From

Sent: 21 February 2018 12:27

To: foreshore

Subject: Foreshore license application FS006788

I wish to voice my objection to this, as it will ultimately lead to the loss of inshore potting ground to wind farms, I and my family have fished this ground for generations.

Submission 4

Pat O'Neill

To: foreshore
Subject: RE: hibernian Wind Power - FS 006788

From: [REDACTED]
Sent: 23 February 2018 09:05
To: foreshore
Subject:

I [REDACTED] wish to voice my objection to this plan as it will impact the
inshore fishing in the area , which my family have been involved with for years , yours , [REDACTED]