

**FS006916 Foreshore Application on behalf of EirGrid plc**  
**Installation of the EirGrid Celtic Interconnector Electricity Cable**  
**Consolidated Prescribed Body Observation**

- Marine Institute
- Inland Fisheries Ireland
- Geological Survey Ireland
- Health and Safety Authority
- Department of the Environment, Climate and Communications
- Environment Protection Agency
- Underwater and Archaeology Unit/National Parks and Wildlife Service
- Department of Agriculture, Food and the Marine
- Marine Survey Office
- Bord Iascaigh Mhara
- Commissioner of Irish Lights
- Sea-Fisheries Policy Management Division, Department of Agriculture Food and the Marine
- Marine Advisor Ecologist, Department of Housing. Local Government and Heritage
- Marine Advisor, Department of Housing. Local Government and Heritage
- Sea Fisheries Protection Authority
- Met Eireann
- Department of Defence
- Irish Coast Guard and Maritime Service
- Bird Watch Ireland

**Date: 1/11/2021**

**Re: FS006916 EirGrid Celtic Interconnector**

A foreshore application has been submitted for the Celtic Interconnector Project development by EirGrid Plc. The project will create an electrical interconnection between Ireland and France to allow the exchange of electricity between the two countries. The link will have the capacity to carry up to 700 MW of electrical energy between the two systems.

The main elements of the overall Celtic Interconnector project are (foreshore relevant components italicised):

- *A High Voltage Direct Current (HVDC) submarine cable of approximately 500 km in length laid between the coast in Brittany France, and the Cork coast in Ireland. The submarine cable will be either buried beneath the seabed or laid on the seabed and covered for protection;*
- *A landfall location in Ireland and France, where the HVDC submarine circuit will come onshore and terminate at a Transition Joint Bay (TJB);*
- *A HVDC underground cable (UGC) in both countries between the landfall location and a converter station compound;*
- A converter station in both countries to convert the electricity from HVDC to High Voltage Alternating Current (HVAC) and vice versa;
- A HVAC UGC in both countries between the converter station compound and the connection point to the National Grid;
- A connection to the National grid; and,
- *A fibre optic link, with associated power supply, will also be laid along the route for operational control, communication and telemetry purposes.*

As it relates to the foreshore, the development comprises the installation of two high-voltage direct current (HVDC) subsea cables and a fibre optic link with associated power supply to be buried within pre-installed Steel/High Density Polyethylene (HDPE) conduits beneath Claycastle Beach, south of Youghal, Co. Cork and car park at Claycastle Beach. The HVDC cables extend across the HWM and enter the two underground concrete chambers of a Transition Joint Bay (TJB); this chamber is where the subsea cables will connect with the onshore cables.

An Environmental Impact Assessment Report and Natura Impact Statement (NIS), among other documentation, were prepared and submitted with the application. These documents consider all aspect of the overall project including the foreshore considerations.

The closest licenced aquaculture site (T05/491A) is in Ballymacoda Bay and is approximately 4.2km to the (foreshore aspects) of the proposed development. The closest Shellfish Grow water area is Ballymacoda Bay (4.1km). On the basis of the information provided in the EIAR, and the relatively short duration of the proposed works (10 weeks), the development is unlikely to impact on any licenced aquaculture activities.

A detailed fishery interaction report was also prepared for the Irish Territorial waters (EIAR Chapter 19). Three main categories of fishing gear fished within the waters adjacent to the proposed cable route:

- Static gear (pots, lines and gill nets);
- Demersal (bottom) trawl gear; and

- Pelagic (mid-Water) trawl gear.

Potential interactions between fishing activities and the cable infrastructure are likely to occur and mitigation measures are identified to minimise the likely negative effect of these interactions. These measures include, among others, active communication at all stages of the development and the appointment of a fisheries liaison officer. In addition, it is anticipated that smooth over-trawlable rock berms and concrete mattresses will be installed where adequate cable burial has not been possible. These measures are considered sufficient to mitigate any negative interactions with demersal fishing activities. The Marine Institute is satisfied that the mitigation measures to be adopted in order to protect commercial fisheries interests are sufficient.

The NIS identifies the likely interactions between the proposed project and the conservation features of all Natura 2000 sites in the vicinity and *ex-situ* features (bird and mammal species). The document provides detailed description of the proposed development and the likely interactions with conservation features. During screening assessment, likely significant effects were identified for a number of conservation interests (for the project alone and in-combination with other plans or projects) and were carried forward for full assessment.

Those features carried forward for full assessment were considered in more detail and likely significant effects were either dismissed or, with certain mitigation measures, conclude that the development is unlikely to impact on the integrity of the conservation sites and *ex-situ* features identified. It would be important that these mitigation measures (Section 3.6<sup>1</sup>) are enacted in full and that they form conditions in any foreshore licence to issue.

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<sup>1</sup> Celtic Interconnector - Volume 6B. Appropriate Assessment Screening Report and Natura Impact Statement  
June 2021



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

## **RE: FS006916 EirGrid Celtic Interconnector Electricity Cable**

### **Overview:**

The Celtic interconnector comprises

- 2 high voltage direct current electricity power cables
- Fibre optic link for control and communication purposes
- Associated works and work sites required to construct, install, test and commission the cables
- Associated works and work sites required to operate, maintain, repair and decommission the cables (including 2 repair events of the 40yr lifetime of the project)

### **IFI Comment**

There are 2 options for burying the cables/trench – when is it expected to know which option EirGrid will proceed with? We ask that once this is known the local IFI office is informed.

The first phase of installation will be completed in winter over approximately 10 weeks from October 2024 to April 2025. Work will be carried out from 7am to 7pm mon – fri and 7-2 on sat. No work will be carried out at night to reduce the impact on migratory species around the Blackwater Estuary. The second phase will take place in summer to avail of favourable weather conditions for the cable installation. Anticipated to take 4 weeks from April 2025 to September 2025.

The beach is used for recreational angling and we ask that signs are installed to inform local anglers when work will be carried out on the beach in advance so as local anglers can make alternative plans for the days access is restricted.

The cable will be buried to a depth of >1.8m across the intertidal zone to a distance approximately 50m shoreside of the lowest astronomical tide. Offshore the cables shall be buried beneath the seabed varying in depth between 0.8m and 2.5m dependent on risk of third-party interactions and seabed conditions.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

These mitigation measures are to ensure the cables are sufficiently buried to reduce heat emissions and electro-magnetic fields. Migratory diadromous fish species will be passing across the cable channels when migrating from Irish sea/ Munster blackwater catchment out to Atlantic Ocean and vice versa. There is a paucity of information on the effects of EMF on fish species in the field.

Mitigation measures are outlined in the NIS document on page 201. IFI asks that all works are conducted in accordance with IFI's "Guidelines on protection of fisheries during construction works in and adjacent to waters". IFI must be included in an Emergency Response Plan as a notifiable body in the event of water pollution occurring during works.

IFI request that the local office is informed 5 days in advance of work commencing on the site. Email: [macroom@fisheriesireland.ie](mailto:macroom@fisheriesireland.ie)



Department of Housing, Local Government and Heritage  
Foreshore Section  
Newtown Road  
Wexford, Y35 AP90

10 November 2021

**Re: Foreshore Application on behalf of EirGrid plc -Installation of the EirGrid Celtic Interconnector Electricity Cable**

**Your Ref: FS006916**

**Our Ref: 21/338**

Geological Survey Ireland is the national earth science organisation and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 16 September 2021, concerning the foreshore application for the installation of the EirGrid Celtic Interconnector electricity cable, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter provides more detail on some of these datasets, with particular reference to the proposed development site.

We are pleased to see use of our Bedrock, Quaternary, Groundwater Wells and Springs, Groundwater Aquifer, Groundwater Vulnerability and Landslide Susceptibility datasets within the EIAR.

**Geoheritage**

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system.

The audit for Co. Cork commenced this year, and will be a three-year process. However, the sites are listed in a master list of unaudited sites, and can be viewed under the Geological Heritage tab on the online [Map Viewer](#) as sites with buffer zones but no specific site boundary. **Our records show that there is an unaudited CGS 1km from the landfall location of the interconnector at Claycastle Beach in Youghal.**

**Youghal (under light-house), Co. Cork. (GR 210900, 76700), under IGH theme: IGH 10 Devonian.**

With the current plan, there are no envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.



### **Geological Mapping**

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data, which can be found [here](#), in your future assessments.

Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.

Further information and download instructions for the Quaternary 3D model of Cork are available on the Geological Mapping programme dedicated [here](#).

### **Geotechnical Database Resources**

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised and can be accessed through downloads from our [Geotechnical Map Viewer](#).

**We would strongly encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas.** This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

### **Marine and Coastal Unit**

We welcome the use of INFOMAR datasets in the offshore EIAR.

The Marine and Coastal Unit also participate in coastal change projects such as [CHERISH](#) (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found [here](#).

### **Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any future site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Geological Mapping Unit, at [GeologicalMappingInfo@gsi.ie](mailto:GeologicalMappingInfo@gsi.ie), 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

**Geological Survey Ireland**

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

**Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes**  
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018  
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c</a>
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Radon Map	Land & Soils/Air	National		<a href="http://www.epa.ie/radiation/radonmap/">http://www.epa.ie/radiation/radonmap/</a>
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228</a>
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b</a>
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0</a>
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c</a>
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	<a href="https://secure.dcaa.gov.ie/goldmine/index.html">https://secure.dcaa.gov.ie/goldmine/index.html</a>
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx</a>
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916dc0b9e">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916dc0b9e</a>
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		<a href="https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/">https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/</a>
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		<a href="http://www.cherishproject.eu/en/">http://www.cherishproject.eu/en/</a>
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx</a>
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Active quarries	Land & Soils	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	<a href="https://gis.epa.ie/EPAMaps/default?teasting=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities">https://gis.epa.ie/EPAMaps/default?teasting=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities</a>
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>

**Notes:**

- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
- Please read all disclaimers carefully when using Geological Survey Ireland data
- Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.



Cork Regional Office, 3rd Floor, 1A, South Mall, Cork  
Telephone: 1890 289 389 Website: <http://www.hsa.ie>

**Re: Foreshore Application [ref.FS006916] for development by Eirgrid PLC. at Claycastle Beach  
Co. Cork & your letter of 15/09/2021**

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Since the above-referenced application appears to be outside the scope of the Regulations, the Authority has no observations to forward.

If you have any queries please contact the undersigned.

Yours sincerely

***Inspector,  
COMAH, Chemical Production & Storage (CCPS)***

**The Department of the Environment, Climate and Communications**  
**Celtic Interconnector Foreshore Licence Application**  
**Irish Government Electricity Interconnection Policy**

The Department of the Environment, Climate and Communications (DECC) does not propose to submit technical observations specifically concerning the foreshore licence application submitted to the Department of Housing, Local Government and Heritage by EirGrid in respect of the Celtic Interconnector. However, the DECC would like to take this opportunity to reiterate existing Government policy with regard to development of electricity interconnectors in general and to highlight Government support for development of this particular project.

From the perspective of Government policy, support for enhanced electricity interconnection is emphasised in the National Policy Statement on Electricity Interconnection, published by DECC in July 2018. The National Policy Statement has assisted Ireland's independent energy regulator, the Commission for Regulation of Utilities (CRU), in determining an appropriate regulatory approach to electricity interconnection, by drawing attention to key policy parameters for consideration in its evaluation of interconnection applications from project promoters. In this regard, the CRU determined in 2019 that the development of the Celtic Interconnector is in the interest of Irish electricity consumers.

Government support for enhanced interconnection, explicitly including development of the Celtic Interconnector, as a means of driving the transition to a low carbon energy future is further reflected in the 2019 Climate Action Plan and in the 2020 Programme for Government. Government support for enhanced electricity interconnection, including interconnectors that have been designated EU Projects of Common Interest (PCI), such as the Celtic Interconnector, is further emphasised in the National Marine Planning Framework published in July 2021. Irish and French Government support for development of the Celtic Interconnector was reiterated in the Ireland France Joint Plan of Action 2021-25, signed by the Foreign Ministers of Ireland and France on 26 August 2021.

In addition to the above, electricity interconnection is viewed as critical infrastructure by the European Commission, with enhanced interconnection between EU member states an essential component of creating a pan-EU internal energy market. EU policy is therefore explicit in its support of electricity interconnection, with interconnection projects facilitated under the EU PCI process. In this regard, it is important to note that the Celtic Interconnector has been awarded €530 million in EU grant funding by the European Commission to ensure project development and the return of direct electricity interconnection between Ireland and the European Internal Energy Market, following the UK's exit from the EU.

In summary, the DECC can confirm that development of the Celtic Interconnector, subject to receipt of all necessary associated consents and permits, is consistent with related Government energy and climate policy.

**The Department of the Environment, Climate and Communications,**  
**1 October 2021**

## Environmental Protection Agency

**Re: Foreshore Consent Application for the EirGrid Celtic Interconnector Electricity Cable - File ref. FS 006916.**

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I refer to your correspondence received 16<sup>th</sup> September 2021 requesting observations from the Agency, in accordance with the requirement as set out the Foreshore Regulations 2011 (S.I. No. 353 of 2011), on the above Foreshore Application and accompanying Environmental Impact Assessment Report and Natura Impact Statement.

The Agency advises as follows:

- In relation to the offshore elements of the project, there was previous engagement between the Agency and Eirgrid regarding the requirement for a Dumping at Sea (DaS) Permit. Eirgrid confirmed that a Dumping at Sea Permit would not be required. The project proponent has been advised by the Agency of the requirement to apply for a DaS permit where '*any deliberate disposal in the maritime area*', including plough dredging, as defined in the Dumping at Sea Act 1996 as amended, is proposed. The Agency is satisfied, based on the information provided during pre-application consultation meetings to date in relation to the proposed works and the techniques that will be employed, as also set out in the Foreshore Application and EIAR, that there is no requirement for a DaS Permit.

The Agency would further advise:

- That the proposed activity shall not result in a contravention of the Water Framework Directive 2000/60/EC, Habitats Directive 92/43/EEC, Marine Strategy Framework Directive 2008/56/EC, Bathing Water Directive 73/160/EEC or Environmental Liabilities Directive 2004/35/EC.

For all further queries and correspondence relating to foreshore and planning matters, please contact [eiaplanning@epa.ie](mailto:eiaplanning@epa.ie).

Please note that there is no requirement for you to acknowledge receipt of this correspondence.

Yours faithfully,

Environmental Licensing Programme

## **Underwater and Archaeology Unit/National Parks and Wildlife Service**

Please find the heritage recommendations of the Department for the above mentioned application.

### **Underwater Archaeology**

Having reviewed the archaeological documentation submitted for the above Foreshore Application the Department makes the following observations/recommendations. Please note that our previous observations/recommendations in relation to the SID application by Eirgrid for the development of portion of an electricity transmission connector for the Celtic Interconnector Project, Co Cork remain unchanged (see below). The observations/recommendations below are additional to those previously made by this Department and are specific to the works proposed below the High Water Mark at the Irish landfall at Claycastle Beach.

Previous investigations and archaeological (Licence Nos. 18E0322; 18R0118; 19E0278) and geotechnical surveys for this project have identified submerged intertidal and subtidal peat deposits extending seaward from the coastline at Claycastle Beach. The peats have produced Neolithic and Iron Age radiocarbon dates and there are antiquarian accounts of flints and Bronze Age metal objects, including a gold dress-fastener, having been discovered here during previous exposures. The EIAR points out that though no archaeological material was identified associated with the peat deposits during the investigations to date 'there is a potential that such could survive given the characteristics of the palaeo-landscape' (EIAR Vol. 3C part p. 413).

Evidence of Ireland's drowned landscapes and settlements presently comprises around 50 sites spread across the entire island (Westley and Woodman, 2020, Ireland: Submerged Prehistoric Sites and Landscapes). Radiocarbon dates from these intertidal and subtidal deposits give ages from as early as 13,500 cal BP right up to 5000 cal BP. In the main they are intertidal find spots or small collections of flint artefacts and only eleven are subtidal, comprising of find spots of stray finds or reworked assemblages of lithic material which have been found either by dredging or by divers. The only subtidal site in Ireland to have been subjected to systematic archaeological investigation is Eleven Ballyboes, Co. Donegal, where a large collection of early Mesolithic flints have been recovered from a submerged peat deposit.

As the peat deposits overlie what is considered to be a Late Pleistocene glacial till and the date of their initial formation in the Early Neolithic is reliant on a single radiocarbon determination, it is possible that some of the deposit is considerably older in age than the Neolithic and perhaps of Late Glacial or Early Holocene date (Cotswold Archaeology p. 43). This hypothesis is supported by the Relative Sea Level (RSL) curves, which indicate that in the extreme south and south-west of Ireland RSL rose from a lowstand of c. -50 to - 90 m and did not reach modern sea level until the Late Holocene. Early and Late Mesolithic human occupation of SW Ireland is well attested archaeologically and Mesolithic dates have been obtained on submerged forest deposits at Ballycotton Bay, 12km to the south-west of Claycastle Beach. Submerged Neolithic megalithic tombs present on the south-west coast at Cork Harbour and Ringarogy Island also attest to sea level rise along this coastline.

The development works associated with the Claycastle Beach landfall thus provide an important and rare opportunity to archaeologically investigate a relatively large, apparently stratified, and intact submerged intertidal and subtidal landscape represented by peat and forest remains, in a coastal zone that was potentially occupied during Ireland's earliest colonisation and settlement. Excavations associated with the cable landfall infrastructure as well as temporary construction compounds could potentially uncover previously unidentified archaeology, in particular associated with these submarine forest and peat deposits. The EIAR recommends as mitigation that a suitably qualified and experienced Project Environmental Specialist be retained to develop a strategy in relation to the investigation and sampling of the submerged landscape along the cable route, in accordance with TII Environmental Sampling Guidelines (EIAR Vol. 3C part p. 437). The EIAR also recommends that targeted test excavations are undertaken to assess the character of the peat deposits (EIAR Vol. 3C part p. 431). Test excavations are also proposed at the landfall area of Claycastle Beach as part of an advance works programme and it is also recommended that exposed peat deposits (15m buffer) and the site of metal object (CH3001) are fenced off and a buffer zone instituted. Archaeological monitoring of construction works is also proposed. Whilst we concur with these mitigation measures, we also recommend, given the potential archaeological significance of the intertidal and subtidal peat deposits which will be impacted upon by the development, that they are subjected to a detailed and comprehensive evaluation, as follows, over and above the test-excavations recommended in the EIAR.

#### Underwater Archaeological Impact Assessment (UAIA)

An Underwater Archaeological Impact Assessment (UAIA) shall be undertaken to address any potential impact to the Underwater Cultural Heritage.

- A licence-eligible, suitably qualified, underwater archaeologist shall be engaged to carry out the Underwater Archaeological Impact Assessment (UAIA).
- The archaeologist should also be suitably experienced, with a track record in dealing with marine and offshore developments, resultant report submission, etc.
- This evaluation should be conducted by a multidisciplinary team of specialists to determine the archaeological, including artefact-bearing, potential of the submerged forest deposits and the nature, date and extent of any such archaeological materials that may exist.
- The evaluation shall include detailed topographical mapping of the peat horizon, a systematic wade and dive survey and careful manual excavation and palaeoenvironmental sampling of a substantial section of the deposit (to be agreed with this Department via a method statement), aimed at retrieving and plotting the locations of worked stone tools and other archaeological materials, should they be identified.
- The UAIA shall include a hand-held metal detection survey, undertaken by a suitably licenced and experienced detectorist. A Dive Licence (section 3 1987 Act) and Detection Device consent (section 2 1987 Act) will be required for these works.
- A detailed method statement shall accompany their licence applications to the National Monuments Service for consideration (both for a Dive Survey Licence to cover the UAIA and a Detection Device Consent to cover the geophysical survey assessment for archaeological purposes and metal detector for the foreshore survey). The licences shall be issued as required under the National Monuments Acts 1930-2004.
- The archaeologist shall be compliant with all licensing requirements, including being up to date with report submissions.

- A preliminary report shall be issued to the Department within four weeks of the end of the excavation works and this report shall summarise the results. The UAIA Report is to contain a detailed Impact Assessment to address all identified cultural heritage and shall also make recommendations for mitigation measures to avoid all impacts to the archaeology. If potential or identified sites, features or artefacts cannot be avoided to allow for preservation in situ, then the UAIA Report Recommendations shall put forward an archaeological mitigation strategy to address this, including preservation by record (archaeological testing and/or full archaeological excavation).
- Once all surveys and follow up interpretations (including radiocarbon dating and palaeoenvironmental analysis) have been completed, the full information is to be compiled into a UAIA report and submitted to the Underwater Archaeology Unit, National Monuments Service for review and further comment. The applicant shall be prepared to be advised by the Department in this regard.
- For wrecks and other sites identified, or the potential location of same, the results to be reviewed by the applicants and the archaeologists and appropriate exclusions placed around them to ensure they are avoided by any works, including SI works.

Once the UAU or the National Monuments Service has had the opportunity to review the UAIA Report, further recommendations may issue. It should be borne in mind that should significant archaeological remains be identified, further archaeological mitigation may be required. These may include refusal of planning permission, relocation and/or redesign (in whole or in part) of the development to allow for preservation in situ, further excavation ('preservation by record') and/or monitoring. The Department of Housing, Local Government and Heritage will advise the applicant with regard to these matters.

### **Nature Conservation**

The proposed development of an electrical cable at Claycastle Beach, Youghal has been evaluated by a Natura Impact Statement (NIS) and other documents. The conclusion of the Natura Impact Statement document is that the proposed works are unlikely to pose a significant likely risk to nature conservation interests in the vicinity. This is supported by the available evidence.

The Department concur with this conclusion in and request that mitigation outlined in Section 3.6 of the NIS document is implemented in full.

**Department of Agriculture Food and the Marine**  
**Our Ref: FW.8.99 EirGrid Celtic Interconnector Electricity Cable**  
**DHLGH Ref: FS006916**

The Department of Agriculture, Food and the Marine has no objections to any licence that issues with regards to this application by

Eirgrid for the Celtic Interconnector Electricity Cable Project.

Aquaculture and Foreshore Management Division  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty  
Co. Cork  
P85 TX47

**Marine Survey Office**

After careful consideration the Marine Survey Office has no objection to the above referenced application from a navigational safety perspective. However the following points shall be of note;

- An appropriate Marine Notice detailing the works and vessels engaged in said works shall be published for the information of all marine users in the sea area covered by the application. Safety notices for mariners shall be promulgated by all available means appropriate during the duration of the subsea cable operations to ensure the safety of navigation is maintained.
- The applicant shall ensure the information regarding the final location, depth and shore markings of submarine cables is submitted to the United Kingdom Hydrographic Office (UKHO) for inclusion on relevant navigation charts.

*Nautical Surveyor*

*Marine Survey Office*

—

**An Roinn Iompair**

*Department of Transport*

**Lána Líosain, Baile Átha Cliath, D02 TR60**

Leeson Lane, Dublin, D02 TR60

## **Bord Iascaigh Mhara**

Colleagues in BIM have already made a submission on this consultation via DAFM. Therefore we will not be making a separate submission at this time.

### **BIM**

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Bord Iascaigh Mhara,  
National Fisheries College of Ireland  
Greencastle  
Co. Donegal F93 PX32

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Ireland's Seafood Development Agency  
**bim.ie**



Commissioners of  
**IRISH LIGHTS**

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and Maritime  
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20 November 2021

Foreshore Unit  
Newtown Road  
Carricklawn  
Wexford  
Y35 AP90

**Request for Commissioners of Irish Lights observations as a statutory consultee under the  
Foreshore Act - FS006916 EirGrid Celtic Interconnector Electricity Cable**

Thank you for contacting the Commissioners of Irish Lights requesting observations on this foreshore licence application dated 16<sup>th</sup> September 2021.

Irish Lights has reviewed this application and observe the application corridor transits through a Marine Aid to Navigation, namely the south cardinal Bar Rocks buoy. Should approval be granted, the Commissioners of Irish Lights should be consulted during the installation phase to avoid any impact to safety of navigation.

If you have any questions please do not hesitate to contact myself or a member of the team.

These comments from the Department of Agriculture, Food and the Marine relate to commercial fisheries. This document has been prepared with scientific input from the Marine Institute and BIM.

Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. The evaluation and consideration of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible, and at every stage of any planning/proposal process and during the process itself, to discuss any changes that may affect them to afford a chance for their input. Fishers' interests, access to fishing grounds, and livelihoods must be fully recognised and taken into account. For instance, Volume 3D2's material assets should also include fisheries.

The concerns of this Department are set under the following key points:

1. Herring stocks around Ireland are regarded as depleted and interference with spawning grounds for these stocks during the time proposed is strongly discouraged.
2. Volume 7 does not adequately address concerns that the selected route passes close to known herring spawning grounds. The proposed timing of construction overlaps with the herring spawning season and this season should be avoided and construction carried out in the period April to mid-August.
3. While meetings were held with two local Fisherman's Associations, the Department would also recommend liaising with national representative organisations whose members operate in the area.
4. Importance of avoiding to the greatest extent possible the Labadie *Nephrops* (Dublin Bay Prawns) ground.
5. Possible interaction of fishing gear with the cable and consideration of mitigation measures.
6. Concerns with regarding the use of AIS (Automatic Identification System) data.

### **1. Celtic Sea Herring stocks are depleted**

Herring are a vitally important part of the marine ecosystem, being prey for marine mammals, birds and many predatory fish. They are also a valuable fishery species, with Irish landings worth up to €13m in 2012 (Fig. 1). Celtic Sea Herring (CSH) is one of three such herring stocks that occurs in Irish waters. The CSH stock encompasses the south east, south and south west of the country. It has been a key fishery for over a century and Ireland holds the vast majority of the yearly allowable catch for this stock. In recent years, however, the size of the CSH stock has fallen to its lowest ever observed biomass (Fig. 2). Due to the extreme sensitivity of CSH, both from an ecological and economic point of view, activities that have the potential to disturb the life-cycle of these fish must be avoided. (Main source: *Marine Institute Stockbook 2021*).

Unusually for a marine fish, herring eggs are deposited on the bottom of the seafloor in discrete gravel beds or flat stone and the herring are completely reliant on these spawning beds for reproduction. However, the locations of the discrete gravel beds can move over time (e.g. due to water movement) so nearby spawning beds are grouped into "spawning grounds", which may contain one or more spawning beds. Spawning grounds are further grouped into spawning areas. The spawning areas, grounds and beds for herring in the Celtic Sea are well known and are located close to the coast (Fig. 3). (Main sources: *O'Sullivan et al., 2013; Breslin, 1998*).

CSH consist of a mixture of autumn- and winter-spawners, and spawning occurs between late September and March. Spawning either side of this period, in late August and spring, has occasionally been reported by fishermen but appears restricted to very exceptional events. (*Main source: Molloy 2006*).

## **2. Interactions with herring spawning grounds**

Volume 7 does not adequately address concerns that the selected route passes close to known herring spawning grounds. The proposed timing of construction overlaps with the herring spawning season and this season should be avoided, and construction carried out in the period April to mid-August.

The impact of cable installation on herring spawning grounds is addressed in volume 3D2, pages 218 and 219, which concludes that the impact is Negligible and Not Significant; mainly because the proposed cable route from Claycastle Beach, Youghal follows a channel that avoids outcropping rocks with surface sediments predominantly formed of sandy mud, with patches of sand, and because cable installation occurs over relatively short time periods and is a singular event that will occur outside of the main herring spawning period.

In contrast to this, Volume 7a states that: The installation sequence (foreshore/nearshore) would be completed in the winter months, i.e. October 2024 to April 2025. This does overlap with the spawning period for herring.

Volume 7a – Part 7 also states that: Fishing / Aquaculture considerations: “The Celtic Interconnector project: Does not cross through any known spawning or nursery habitat.” This contradicted by a statement in Vol-3D2-technical-chapters: “This data indicates that the proposed marine cable route passes within or close to the spawning grounds of nine principal fish species including cod, haddock, hake, herring, lemon sole, ling, megrim, mackerel, pollock, sprat and whiting” It should be noted that the proposed route is very close to a known spawning ground.

In terms of spawning grounds, this cable should only directly affect species that spawn on the seabed; species that spawn in the water column (broadcast spawners) are unlikely to be significantly affected. The main species of commercial interest that spawn on the seabed are herring, skates and rays and squid. Detailed maps of spawning grounds exist for herring but not for other species that spawn on the seabed. Figure 4 shows the locations of herring spawning grounds off the Irish south-east coast in relation to the proposed cable route options. It is clear that the easterly route options are likely to interfere with the group of spawning grounds off Dunmore East. The westerly route options come close to the Ballycotton and Youghal grounds and may interfere with these grounds. The spawning activity around Ballycotton and Youghal occurs mainly in November and October respectively. It is important to note here that some species of skates are critically endangered and also given that the main Herring stocks around Ireland are regarded as depleted, interference with spawning grounds for these stocks during this time is strongly discouraged.

Herring spawning grounds are vulnerable to anthropogenic damage (damage caused by human activity) such as dredging, sand and gravel extraction, dumping of dredge spoil and waste from fish cages. The International Council for the Exploration of the Seas ICES has consistently stated that: “Activities that have a negative impact on the spawning habitat of herring, such as the dumping of dredge spoil, the extraction of marine aggregates (e.g. gravel and sand), and the erection of structures such as wind turbines in the vicinity of spawning grounds are a cause for concern” and advises that: “Activities that have a negative impact on the spawning of herring should not occur unless the effects of these activities have been assessed and shown not to be detrimental to the productivity of the

stock<sup>1</sup>". Smothering of gravel spawning beds via sediment plumes and noise during works would also cause disruption to herring spawning behaviour.

Due to the sensitivity of Celtic Sea Herring, **disturbance to spawning must be avoided**; mitigation is not an option. Due to a planned route bisecting a known spawning ground, works should be restricted to non-spawning time, i.e. April to mid-August. The geospatial coordinates of known spawning gravel beds must be adequately buffered to allow for minor mapping inaccuracies and substrate movements. Similarly, a further buffer zone should be added to avoid any resulting sediment plume from reaching the spawning beds. This may require an analysis of water movement in the area and restricting works to times with favourable conditions. Spot testing for gravel along the chosen route through the spawning ground is also advised.

### **3. Suggest meetings with Irish producer organisations**

In volume 2B and other mentions elsewhere, we note meetings were held with both Youghal and Ballycotton Fisherman's Associations. The Department would also recommend liaising with national representative organisations whose members operate in the area.

We would recommend also contacting the local fishing producer organisations including, but not limited to: the Irish South & East Fish Producers Organisation ([ISEFPO@gmail.com](mailto:ISEFPO@gmail.com)), the National Inshore Fisheries Forum ([denise.maloney@bim.ie](mailto:denise.maloney@bim.ie)), the local Regional Inshore Fisheries Forums ([SWRIFF@inshoreforums.ie](mailto:SWRIFF@inshoreforums.ie) and [SERIFF@inshoreforums.ie](mailto:SERIFF@inshoreforums.ie)) and the Irish South & West Fish Producers Organisation ([Carmel@IrishSouthAndWest.ie](mailto:Carmel@IrishSouthAndWest.ie)). It is likely that members of the different organisations will have previous experience in dealing with subsea cables and pipelines and will understand what this will mean to their operation.

Mention elsewhere is made to a fisheries liaison officer tasked on the project, which is encouraging. The fisheries liaison officer should be a key link with the stakeholders in the Celtic Sea fisheries and will need to keep them well informed on key developments, e.g. restrictions because of cable laying and rock armour deployments. Discussions with the various fishery representative groups would also help clarify how fishers have managed cable related risks in the past, considering the number of subsea cable and pipelines there are in the Celtic Sea.

### **4. Overlap with the Labadie Nephrops ground**

It is important to avoid, to the greatest extent possible, the Labadie Nephrops (Dublin Bay Prawns) ground and where this is not possible that there is prior engagement with fishing industry to ensure the minimum of disruption.

Volume 3D2 contains a section on commercial fisheries. The following appears on page 368: "The proposed cable route avoids the principal Nephrops (Dublin Bay Prawn) fisheries located to the east and south west of the cable route.". This statement is somewhat misleading as the cable does cross the north-eastern part of the Labadie Nephrops grounds, an area with a significant amount of Nephrops directed fisheries. (figs 5 and 6). This is not acknowledged in the documentation. The basis for identifying the selected route as the preferred option is not well documented and, from a fisheries point of view, not supported by VMS data (Vessel Monitoring Systems) which automatically collect positional data from fishing vessels.

When combined with the reports as outlined in the Introduction (page 337), the survey of fishing vessels is a little limited (Apr – Sept 2014 and May –Oct 2015 for AIS, and 2009 for VMS) and may not

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<sup>1</sup> ICES, 2003, 2015

reflect current fishing operations in the Celtic Sea given that the most recent data is almost six years old. The limitations of the survey could mean that some fishing operations have not been identified. For example, demersal (whitefish) seine net fishing does not appear to be a significant fishing operation in this report but does feature in the areas near the proposed routes in Figure 19.3 (page 347). The fishing industry representative organisations will be best placed to comment on how the survey data compares to current fishing operations and potential associated changes to fisheries management.

The appointment of the fisheries liaison officer is key for implementing the measures to offset the effects to fisheries. The fisheries liaison officer needs to make sure that they can contact and keep all relevant stakeholders in the Celtic Sea fishery informed.

## **5. Interactions between gear and the seabed**

The Department wishes to highlight concern about possible interaction of fishing gear with the cable and urges consideration of mitigation measures to be discussed with fishing industry representatives.

*We note on page 150 of Volume 5: “Fishing vessels, and trawlers in particular, are likely to change their fishing areas due to rock placement work in certain sectors. There will be a greater risk of nets getting caught in these areas. However, the external protection is designed in such a way as to allow trawl nets to pass over them. It will be up to the examining authorities to decide whether fishing can take place around the subsea construction site.”*

Otter and beam trawl fishing gear will be able to pass over most obstacles but demersal (whitefish) seine nets (especially those without large disc ground gear) and dredges are unlikely to be able to pass over rock placements or exposed cable. Additionally, rock placements will be a potential entanglement for static nets and traps.

The information regarding gear penetration in volume 3D2 Appendices omits specifics on dredging (e.g., scallop gear). Scallop dredges will penetrate the substrate by up to 50 mm; some information on scallop dredges is included in Volume 3D (pages 346) and highlights that they should not be an issue unless the cable is uncovered or not buried deep enough. While the cable remains buried it is unlikely to restrict fishing activity for most gears. However, in areas where rock armour is used to cover the cable there will likely be some restrictions to those gears that are typically towed over clean (free of obstruction) ground, i.e. dredges and seines.

Again, while the cable remains buried it is unlikely to restrict fishing activity for most gears. However, in areas where rock armour is used to cover the cable there will likely be some restrictions to those gears that are typically towed over clean (free of obstruction) ground, i.e. dredges and seines. The fisheries liaison officer and meetings with the industry representatives will be a key link with the stakeholders in the Celtic Sea fishery and the need to keep them well informed on the location of any obstructions.

## **6. Concerns over use of AIS data (Automatic Identification System data)**

Volume 3D2 Appendices: pg 412: Fishing analysis: Investigates the presence of vessels in the area. This section describes a detailed analysis of AIS data (Automatic Identification System data or vessel traffic data) but it is not particularly informative.

Although all vessels of 15 metres and over are obliged to carry AIS, the coverage of the AIS data is highly variable in space because only data that is received by a base station or a satellite is recorded<sup>2</sup>. In general, the coverage close to shore is quite good (close to 100%) but further offshore the coverage can be as low as 10%. This can lead to significant bias in the results.

The analysis was carried out along a study transect. The results are then extrapolated to the various route options by identifying general regions of high activity. The two main areas of fishing activity that were identified are 1) the area close to the Irish shore and 2) south of the Scilly Isles (p425 of the pdf). These findings are not fully supported by the VMS data (Figure 5). The high levels of activity near the Irish coast could be an artefact of higher AIS coverage, compared to further offshore areas. Figure 5 does not indicate that this is an area of particularly high activity. Figure 5 does confirm that there is beam trawl activity in the other main area of activity (south of the Scilly Isles) but when the total activity of all bottom contacting gears is considered (top-left map in Figure 5) this does not appear to be an area of particularly high activity and not necessarily a reason to choose route 2 over route 1 (which passes closer to the Scilly Isles but avoids the Labadie grounds)

In summary, the basis for identifying areas of fishing activity is not particularly sound. Having said that, the proposed preferred option (route 2) does avoid the Smalls grounds, which has by far the most activity in the area.

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<sup>2</sup> Shepperson, J. L., Hintzen, N. T., Szostek, C. L., Bell, E., Murray, L. G., & Kaiser, M. J. (2018). A comparison of VMS and AIS data: The effect of data coverage and vessel position recording frequency on estimates of fishing footprints. *ICES Journal of Marine Science*, 75(3), 988-998.

Figures

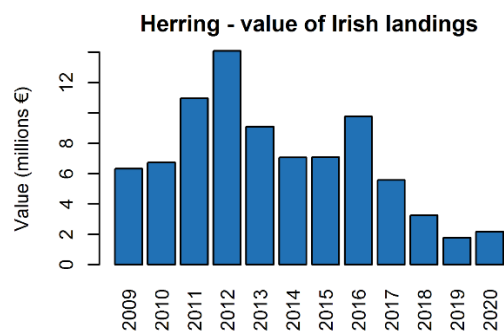


Figure 1. Yearly value of Irish herring landings (all stocks)

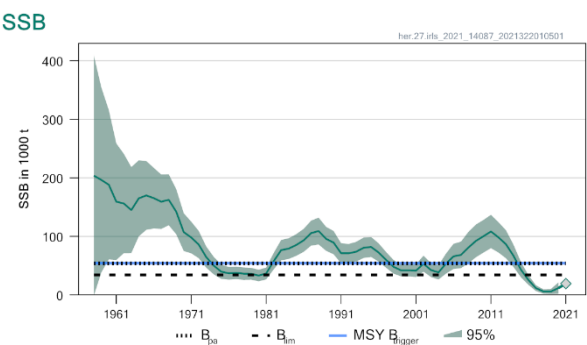


Figure 2. Stock biomass of Celtic Sea Herring. Horizontal lines depict management targets and limits.



Figure 3. Herring spawning grounds and areas around Ireland (O’Sullivan et al 2013).

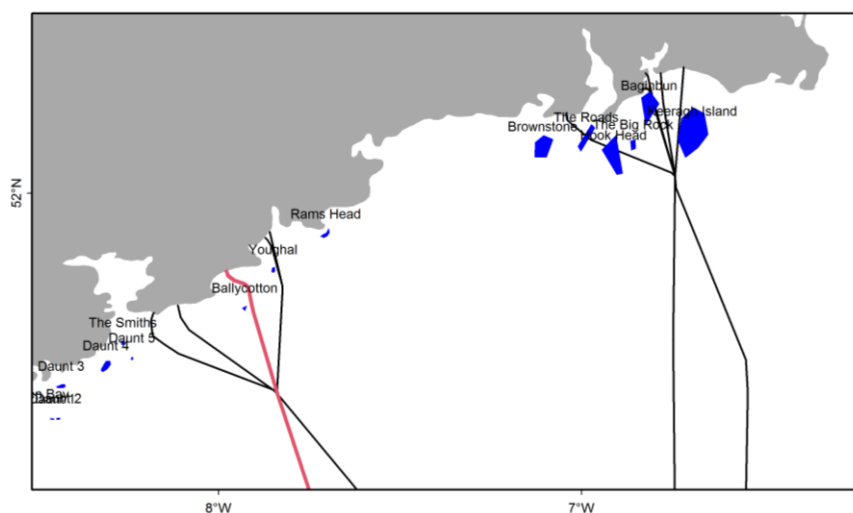


Figure 4. Location of herring spawning grounds<sup>3</sup> and the various cable route options. The preferred route 2 is highlighted in red. This is the only option shown in volume 7B.

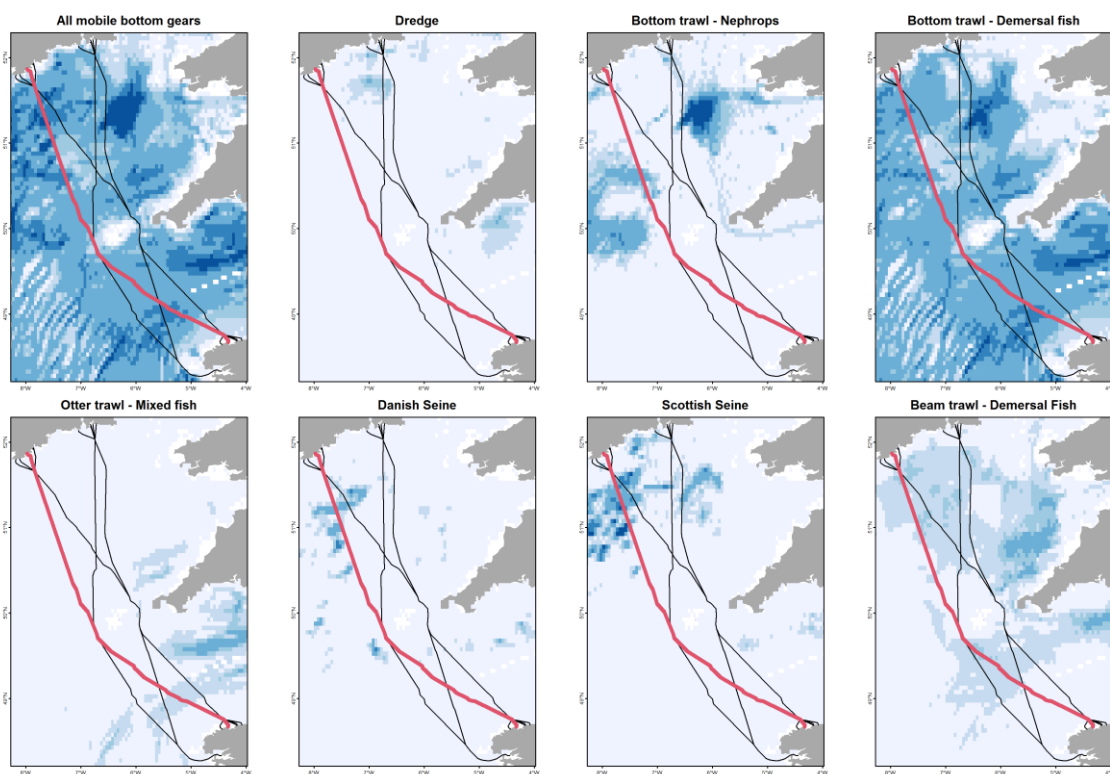


Figure 5. International fishing activity in the period 2013-18<sup>4</sup> and the various cable route options. The preferred route 2 is highlighted in red. This is the only option shown in volume 7B.

<sup>3</sup> O'Sullivan, D., O'Keeffe, E., Berry, A., Tully, O., and Clarke, M. (2013) An Inventory of Irish Herring Spawning Grounds. Irish Fisheries Bulletin No. 42: Marine Institute

<sup>4</sup> ICES. 2021. ICES advice to the EU on how management scenarios to reduce mobile bottom fishing disturbance on seafloor habitats affect fisheries landing and value.: ICES data product release, <https://doi.org/10.17895/ices.data.8192>

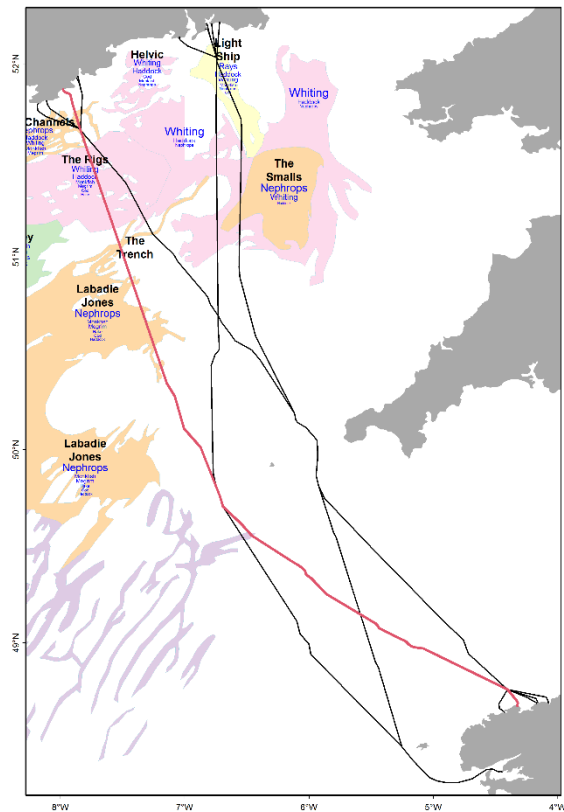


Figure 6. Main demersal (whitefish) fishing grounds of interest to Irish vessels<sup>5</sup> and the various cable route options. The preferred route 2 is highlighted in red. This is the only option shown in volume 7B.

#### Sources:

- Breslin J.J. (1998) The location and extent of the main Herring (*Clupea harengus*) spawning grounds around the Irish coast. Masters Thesis: University College Dublin
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Foreshore Unit,  
Department of the Housing, Local Government and Heritage,  
Newtown Road,  
Co. Wexford  
01<sup>st</sup> of November 2021

### **Prescribed Bodies Consultation Stage - Environmental Report**

**Re:** Foreshore licence application for the construction and operation of a subsea electrical interconnector cable from the Irish EEZ to landfall at Claycastle, Co. Cork - FS006916

**Applicant:** EirGrid plc

#### **Supporting information submitted:**

- Volume 7A Statutory Particulars for Ireland Foreshore Licence Application (Completed Application Form) 8<sup>th</sup> July 2021
- Volume 3B Ireland Offshore Environmental Impact Assessment Report – Non-Technical Summary June 2021
- Volume 3D1 Environmental Impact Assessment Report – Non-Technical Summary Introductory Chapters June 2021
- Volume 3D2 Environmental Impact Assessment Report –Technical Summary Chapters June 2021
- Volume 3D2 Environmental Impact Assessment Report –Appendices June 2021
- Volume 4 UK Environmental Report supporting the Marine Licence Application June 2021
- Volume 4 – Appendix 5A Construction and Environmental Management Plan June 2021
- Joint Environmental Report (JER) pt.2 May 2021
- Volume 6B Appropriate Assessment Screening Report and Natura Impact Statement June 2021
- Volume 7A Appendix B:Size of Area June 2021
- Volume 7B Foreshore Licence Map 1 400584\_PL-DWG-009 Rev D
- Volume 7B Foreshore Licence Map 2 400584\_PL-DWG-009 Rev D
- Volume 7B Ireland Offshore EIAR\_Celtic Interconnector Irish Shore Approach and Landfall at Claycastle Typical Section 400584-SK-DWG-005 Rev D
- Volume 8B Marine Strategy Framework Directive Assessment – Ireland June 202
- Volume 8C Water Framework Directive Assessment – Ireland June 202

Your email of the 17<sup>th</sup> of November 2021 refers to this licence application for the construction and operation of a subsea electrical interconnector cable from the Irish EEZ to landfall at Claycastle, Co. Cork. There are ten Natura 2000 sites within the zone of influence of this project. This SPA is one of the few sites in the country which regularly supports more than 20,000 wildfowl and is therefore one of the most important. These sites hold nationally and internationally important populations of a variety of bird species, they are important for a variety of fish species including Salmon and Twaité Shad and breeding sea birds.

#### **Assessment Process**

The Minister for Housing, Local Government and Heritage, is responsible for carrying out environmental screening and any environmental assessments determined as being required following



screening, in accordance with the requirements set out in Directive 92/43/EEC (**Habitats Directive**), Directive 2009/147/EC (**Birds Directive**) and Directive 2011/92/EU, as amended by Directive 2014/52/EU (**EIA Directive**), in respect of applications under the The Foreshore Act 1933, as amended. Outside of the Directives, the Minister is also required to consider environmental issues in respect of applications under the Foreshore Act 1933, as amended.

### **Habitats Directive**

The Appropriate Assessment process (AA) is an assessment of the potential for adverse or negative effects of a plan or project, in combination with other plans or projects, on the conservation objectives of a European Site (Natura 2000 site). The focus of AA is targeted specifically on Natura 2000 sites and their conservation objectives.

Article 6(3) and 6(4) of the **Habitats Directive** place strict legal obligations on Member States to regulate the conditions under which development that has the potential to impact on European Sites can be proceed. It requires that an Appropriate Assessment be carried out of plans or projects, not directly connected with or necessary to the management of a site as a European Site, but which are likely to have a significant effect thereon, either individually or in combination with other plans or projects. An AA Screening assessment is carried out to determine whether a plan or project is likely to have a significant effect on a European Site.

- Article 6.3 states that: *“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*
- Article 6.4 states: *“if, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.*

*Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.”*

In giving effect to the above as a matter of Irish law, the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011, as amended) (**Birds and Natural Habitats Regulations**) provide as follows:-

Regulation 42(1) of the Birds and Natural Habitats Regulations states that: *“A screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site”.*

Regulation 42(2) provides that: *“A public authority shall carry out screening for Appropriate Assessment under paragraph (1) before consenting for a plan or project is given, or a decision to undertake or adopt a plan or project is taken”.*



The Birds and Natural Habitats Regulations further provide as follows at Regulation 42 (6) and 42 (7):-

*6. The public authority shall determine that an Appropriate Assessment of a plan or project is required where the plan or project is not directly connected with or necessary to the management of the site as a European Site and if it cannot be excluded, on the basis of objective scientific information following screening under this Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site.*

*7. The public authority shall determine that an Appropriate Assessment of a plan or project is not required where the plan or project is not directly connected with or necessary to the management of the site as a European Site and if it can be excluded on the basis of objective scientific information following screening under this Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site.*

Furthermore, under section 42A (13) of S.I. No. 293 of 2021 an Appropriate Assessment, including the specified public consultation, must be carried out before the public authority makes a decision to undertake or adopt the proposed plan or project.

#### **Risk Assessment for Annex IV Species**

Outside of designated Natura 2000 sites, the waters around Ireland's coast are a suitable habitat for a number of species listed under Annex IV of the Habitats Directive (92/43/EEC). Article 12 of the Habitats Directive affords strict protection to those species listed in Annex IV of the Directive wherever they occur. Where necessary a Risk Assessment for adverse effects of the proposed works on Annex IV species must be undertaken and a report produced. This assessment is separate to that undertaken under Article 6.3.

The purpose of the Risk Assessment is to examine the possibility that the proposed project either individually or in combination with other plans and projects, may result in the deliberate disturbance or destruction of any of the species listed in Annex IV which may be present in the works area. The Risk Assessment should take into account the status (e.g. as indicated in the latest Article 17 reporting for Ireland, NPWS 2019) and sensitivities of relevant Annex IV species to potential impacts associated with the proposed project.

The **Risk Assessment for Annex IV Species** should be precise, with definite findings, mitigation and conclusions removing all reasonable scientific doubt as to the effects of the proposed project on any Annex IV species.

#### **EIA Directive**

In Ireland, in accordance with Directive 2011/92/EU, as amended by Directive 2014/52/EU (hereafter, the EIA Directive), projects that are likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location must be subject to an EIA.

Article 4 of the EIA Directive requires that projects listed under Annex I must always have an EIA while projects listed under Annex II shall be subject to an EIA if (i) determined on a case-by-case basis or (ii) they exceed certain thresholds set by each Member State. Thresholds have been set for Annex II projects in Irish legislation. Projects which do not meet the threshold may still require an EIA if the project is likely to have significant effects on the environment. Annex I and Annex II projects have been transposed into Section 5 (Parts 1 and 2) of the Planning and Development Regulations 2001, as amended.

Section 13A(1)(b)(i) of The Foreshore Act 1933, as amended, requires that an EIA be carried out for all developments of a class specified in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations where the development exceeds the relevant quantity, area or other limit specified in that Part, or where no quantity, area or other limit is specified. Section 13A(1)(b)(ii) of the Foreshore Act states that an EIA shall be carried out when a development is of a class specified in



Part 2 of Schedule 5, but does not exceed the relevant threshold (i.e. sub-threshold) and the Minister determines that the proposed development would be likely to have significant effects on the environment. Therefore, it is necessary to examine such projects on a case-by case basis.

In the case of Annex II projects that are determined on a case-by-case basis, or sub-threshold, an EIA screening is required to determine if the project will have significant effects on the environment. Under Article 4(4) the developer (applicant) is required to submit information on the characteristics of the project and its likely significant effects on the environment. The developer may also provide a description of any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment. Subsequently, in accordance with Article 4(5), the Minister is required to make a determination, which shall be made public, that:

1. Where it is decided that an EIA is required, states the main reasons for requiring such assessment with reference to the relevant criteria listed in Annex III (Schedule 7 of the Planning & Development Regulations 2001) of the EIA Directive; or
2. Where it is decided that an EIA is not required, states the main reasons for not requiring such assessment with reference to the relevant criteria listed in Annex III of the EIA Directive, and, where proposed by the developer, states any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The proposed project is not of a type/class that is included in Annex I and II of the EIA Directive (Schedule 5 to the Planning & Development Regulations). However an EIA Pre-Screening process is a requirement to demonstrate this analysis. Accordingly, **please find attached an EIA Pre-Screening** for the proposed project.

### **Non-statutory Environmental Report**

Where projects do not fall under a class that require an EIA or an EIA Screening and in-keeping with good governance, a Non-statutory Environmental Report assessing the environmental effects of the proposed works on the receiving environment is required. This report will document the current state of the environment in the vicinity of the proposed activity in order to quantify the effects, if any on the environment, and if applicable to highlight how mitigation will be implemented to minimise impacts on the environment. The EPA Guidelines on the Information to Be Contained in Environmental Impact Assessment Reports (2017) indicates the relevant topics to be covered in this report.

### **Independent Environmental Consultants (IEC)**

Owing to the scale and complexity of the environmental assessment required, and taking account of the available resources within the Department, I recommend that Foreshore Section of DHLGH engage a suitable qualified IEC. The IEC must conduct an independent assessment of the information provided by the Applicant, having regard to the Habitats Directive, the Birds Directive, the Birds and Natural Habitats Regulations, the EIA Directive, Non-statutory Environmental Reports and relevant jurisprudence of the EU and Irish courts.

The IEC shall ensure that The Minister has all the environmental assessments required to allow them to make decisions on applications under The Foreshore Act 1933, as amended in accordance with the requirements set out in Directive 92/43/EEC (**Habitats Directive**), Directive 2009/147/EC (**Birds Directive**) and Directive 2011/92/EU, as amended by Directive 2014/52/EU (**EIA Directive**).

### **Conclusion/Recommendation**

In principle I have no objections to this application. As outlined above, I recommend that Foreshore Section of DHLGH engage a suitable qualified IEC. On completion of the Public and Prescribed Bodies Consultation and the work of the IEC, I will furnish my AA Screening Determination and Environmental Report. If the Minister adopts and approves these reports and a determination is made



that a Stage 2 Appropriate Assessment is required a public consultation will be held on the AA. The Final Environmental Report with Determinations (if an EIAR Reasoned Conclusions should be address here) which may include any case specific conditions identified through the environmental assessments will follow having regard to the information obtained during public participation.

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Marine Advisor, Environment.



Foreshore Unit,  
Department of the Housing, Local Government & Heritage,  
Newtown Road,  
Co. Wexford.

18/01/2022

**File Ref:** FS006916

**Re: Foreshore Licence application for a submarine electricity interconnector on state foreshore as part of the Celtic Interconnector between Ireland and France. The proposed works include the pre-lay installation works, the cable installation works and the operation and periodic maintenance of the submarine electricity interconnector.**

**Applicant:** EirGrid plc, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4.

**Site Location:** From Claycastle Beach, Youghal County Cork to 12nm Limit.

**Supporting information considered:**

- Application Form.
- Application Drawings and Maps
- Planning and Consultation Report for the Foreshore Licence Application
- Celtic Interconnector Ireland Offshore Environmental Impact Assessment Report

## **1.0 Project Overview and Background**

EirGrid plc propose pre-lay installation works, the cable installation works, the operation and periodic maintenance of a submarine electricity interconnector between Ireland and France. The interconnector will include a fibre optic cable to enable communication and operational control of the interconnector, with the potential to also be used for commercial use.

### **1.1 Brief Description of the proposed works**

#### **1.1.1 The Celtic Interconnector comprises:**

- Two no. high voltage direct current (HVDC) electricity power cables, cable diameter 100mm to 200mm;
- One no. fibre optic cable for control and communication purpose, cable diameter approx. 20mm;
- All associated works and work sites required to construct, install, test, and commission the three no. cables; and
- All associated works and work sites required to operate, maintain, repair and decommission the three no. cables over the approximately 40 year lifetime of the Project.

#### **1.1.2 The Cable Route**

The proposed Celtic Interconnector cable route extends from the land fall at Claycastle Beach, Youghal County Cork to 12nm Limit. The route follows a south easterly course from the landfall to offshore where it turns south westerly until it crosses the 12nm limit and the seaward limit of state owned foreshore, a total of approx. 35km. It continues then in a south easterly direction across the Irish, UK and French EEZs until making land fall at Kerradence, France. The entire cable route is approx. 497km with 35km on state owned foreshore

#### **1.1.3 Marine Construction Works**

##### **1.1.3.1 Pre-Lay Grapple Run**

Pre-lay grapple runs will be required along the cable route on the seabed to ensure debris, for example redundant cables, fishing gear, discarded ropes, are cleared in advance of cable lay.



The cable footprint on the seabed is anticipated to be approximately 5.0m wide. However, this may increase to approximately 15.0m during seabed preparation and cable installation works due to the size of the equipment deployed for these activities.

#### **1.1.3.2 Cable Lay & Burial**

It is proposed that the submarine cable will be installed in a bundled configuration, with the fibre optic cable also installed within the bundle. The submarine cable is loaded on to the cable laying vessels into a carousel located on-board and is fed to the laying arm at the stern of the vessel and on to its position on the ocean floor. The cable laying vessels have the ability to simultaneously lay and bury the cables. The target burial depth of the cable is 0.8m to 2.5m for offshore.

The burial technique will vary depending on geology of the seabed. The sediment coverage along the cable route is considered good, consisting of a combination of loose to dense sand, dense sandy gravel and high strength clay. Cable installation is envisaged using standard burial tools such as plough or jetting tools. Some rock protection may be required where the target depth is not fully achieved through burial.

#### **1.1.4 Landfall Installation Construction Works**

The cable landfall installation method selected for Claycastle Beach is an open cut installation method with temporary cofferdams to install the conduits to take the cables ashore. Horizontal Directional Drilling (HDD) is not feasible due to the distance to the 5m water depth required. The target burial depth of the cable is 1.8m to 3.0 m for the land fall. It is envisaged by applicants that landfall installation construction works will take up to approximately 10 days max.

## **2.0 Estate Management**

### **2.1 Site Inspection, Existing Use and Activities**

I inspected the landfall site at Claycastle Beach, Youghal County Cork on 09/12/2021 at approx. 10:30hrs. Claycastle Beach is part of a 3.5km long beach with good public access, parking, toilets and the lifeguard service in Youghal Town. As the use of HDD was deemed not feasible by the applicants so the potential disruption to existing amenity and leisure users, walkers etc. will be significant where the cable makes land fall for the approx. 10 days max that the landfall installation construction works will take. However the beach and strand at Youghal is over 3.5km long with numerous access points and ample parking and so there is ample alternative access and amenity available to beach users so the overall disruption impact will not be significant

### **2.2 Site Consent and Application History**

Over its route to the 12nm the proposed licence area overlaps with the following foreshore consents/applications;

FS006722 Geophysical Marine Survey Works;

FS006811 Geotechnical and Environmental Marine Survey Works;

FS006859 Site Investigations Relating To a Possible Windfarm;

FS005997 Site Investigation Re Possible Site for Aggregate Extraction;

The following consents are adjacent to the site of the landfall site;

FS005447 Youghal Town Council Coastal Protection Works;

FS005715 Irish Water Stormwater Outfall.

The proposed Celtic Interconnector proposed under this application will not conflict with any existing consented activities or any applications under consideration.

All foreshore is presumed state owned unless proven otherwise. There are no known or established claims of private ownership of the foreshore along the route of the cable. Therefore the foreshore the subject of this application is currently presumed state owned and

proposed development does not conflict with the existing overlapping and adjacent consents or applications nor does it significantly injure the public use of, access to and enjoyment of the foreshore.

Total area of foreshore the subject of the application: 1757.14ha. from the HWM to the 12nm limit, however this is the corridor within which the licensee shall place the cable. Following laying of the cable the licence area shall revert to the as laid route and include 5 meters either side of the cable. For valuation purposes the foreshore licence area for cable shall be the length to the 12nm limit, which is approx. 35km by a 10m width. **Therefore the total area for valuation purposes is 35ha.**

### **3.0 Public Interest**

Section 2 and 3 of the Foreshore Act, as amended, states that a lease or licence of state foreshore may be granted “If, in the opinion of the Minister, it is in the public interest”. As state owned foreshore is a finite and valuable state resource and a public amenity, it is important that each plan and project is fully assessed to ensure, that if consented to, it is a sustainable and proper use of that resource.

Transmission Policy 1 of the National Marine Planning Framework states subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland’s energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations.

This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government’s target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system/interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems.

Once laid the cable will not impact the public’s use and enjoyment of the foreshore. Having considered the works as proposed I am satisfied that the proposed project is in the public interest.

### **4.0 Assessment & Conclusion**

The foreshore the subject of this application from Claycastle Beach, Youghal County Cork to 12nm Limit is state owned, there are no conflicts with existing licences or applications and the works as proposed are in the public interest. The works if completed as proposed will not have significant adverse impacts on the public use of, access to and enjoyment of the foreshore, navigation, fisheries or the environment (subject to MLVC confirmation).

### **5.0 Recommendation**

I have no objection to the granting of Foreshore Licence under Section 3 of the Foreshore Act for this application subject to the following conditions;

1. The licensee shall use that part of the foreshore, the subject matter of this licence for the purposes as outlined in the application and for no other purposes whatsoever.
2. The following drawings shall be attached to and referenced in the licence document;  
Foreshore Licence Map 1, Drawing Number: 400584-PL-DWG-009 Rev: D. Date: 10/06/21,  
Foreshore Licence Map 2, Drawing Number: 400584-PL-DWG-009 Rev: D. Date: 10/06/21.

3. Cable installation and maintenance shall be completed in accordance with the application and supporting documents provided in the application process.
4. Decommissioning procedure shall be in accordance with best practise at that time. This could involve leaving in situ, mitigation works, partial removal and full removal or otherwise agreed with the lessor and the relevant competent authorities at that time in compliance with all relevant legislation and environmental requirements.
5. On completion of the works, the Licensee shall submit to the Department of Housing, Local Government and Heritage a statement from a suitable qualified Chartered Engineer confirming that works are completed in accordance with the documents submitted together with a drawing and a route position list showing the “as-laid location” for the submarine cable.
6. The licensee shall notify the Department of Housing, Local Government and Heritage at least 14 days in advance of the commencement of any works on the foreshore. This notification shall include an up to date Programme of Works for the completion of the project.
7. During the course of the nearshore/landfall cable lay operations the Licensee shall ensure that existing public access arrangements are maintained, where possible, and all necessary precautions are put in place to protect the public in accordance with relevant Health and Safety Legislation.
8. The foreshore and adjacent seashore beach area shall be restored to its natural condition on completion of the cable installation works to the satisfaction of the Department of Housing, Local Government and Heritage.

Engineering Inspector and Marine Advisor

## Sea Fisheries Protection Authority Eastern Region

West Pier,  
Howth,  
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Fax: +3531 8321911  
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<b>Application No:</b>	FS006916	<b>Applicant Name:</b>	Eirgrid Celtic Interconnector Cable, Claycastle , Co. Cork
<b>Application Category</b>			
Aquaculture	Foreshore General	Energy	Other
		<b>Cable Crossing</b>	
<b>Location</b>	Claycastle Beach, Co.Cork	<b>Species</b>	
<b>Date</b>	19-01-2022	<b>SFPA Region</b>	Southern

<b>Inspectors comments</b>
<p><b>1. Wild Fisheries</b></p> <p>There are a number of wild fisheries adjacent to the applied area however it has been highlighted by SFPA Clonakilty Port Office that the potential effects will be negligible. The SFPA will not be restricted in conducting official controls within the applied area.</p>
<p><b>2. Shellfish Production Areas</b></p> <p>There are no shellfish production areas within the applied area</p>
<p><b>3. Seafood Safety</b></p> <p>All spillages and pollution events at the development site which may cause potential contamination of seafood are to be immediately reported to the Clonakilty SFPA Food and Fisheries Support Office <a href="mailto:sfpafood&amp;fisheriessupport@sfpa.ie">sfpafood&amp;fisheriessupport@sfpa.ie</a></p>
Date 19-1-2021

Met Eireann

Thanks for your e-mail regarding the Foreshore licence for the Celtic Interconnector.

The only concern Met Eireann have is that we have an automatic climate monitoring station about 3km due north from Claycastle beach. To avoid negative impacts on sensitive climate monitoring equipment, dust mitigation measures would be required from the perspective of heavy vehicles in the area during the construction phase of the project.

Please let me know if you need any further information.

Kind regards,

Observations Division

Web: [www.met.ie](http://www.met.ie)

Department of Defence

I write in response to your e-mail dated 08 December 2021 re. EirGrid Celtic Interconnector Electricity Cable.

Having consulted with the subject matter experts in the Naval Service, the Department of Defence has nil observations to make on the application.

Please contact me if you have any queries in this regard.

*Property Management Branch An*

**Roinn Cosanta** *Department of*

*Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W 12 AD93.

## Irish Coast Guard and Maritime Services

IRCG have no comment at this point, other than a reminder to operators to provide the usual notifications of their operations in good time to the Irish Coast Guard, Maritime Rescue Coordination Centre (MRCC) Dublin.

*IRCG Admin\_Maritime Strategy & Governance Division*

**An Roinn Iompair**  
*Department of Transport*

**Lána Líosain, Baile Átha Cliath, D02 TR60**  
Leeson Lane, Dublin, D02 TR60

[ircgadmin@transport.gov.ie](mailto:ircgadmin@transport.gov.ie) [www.gov.ie/transport](http://www.gov.ie/transport)

## Bird Watch Ireland

Many thanks for your email. I have scanned some of the documents. It would appear that at least some of the EIAR docs are scanned PDFs making word searches impossible. Can the original docs be provided please?

Also, is there a non-technical summary available?

There are thousands of pages to be reviewed and we don't have the capacity to review them all. To assist us, can you pin point the sections in the reports where the exact route is outlined from Claycastle beach to the substation? And is Claycastle the final choice for landfall?