



Celtic Interconnector

Volume 8A

Planning and Consultation Report

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1 Introduction

1.1 Introduction and project overview

The Celtic Interconnector Project ('the Proposed Development' hereafter, for the elements within Irish Waters) is a proposed electrical link between Ireland and France that will enable the import and export of electricity between the two countries. It will be the first direct energy link between Ireland and France and is being jointly developed by EirGrid plc (EirGrid) and Réseau de Transport d'Électricité (RTE) ('the Project Promoters'), the Transmission System Operators (TSOs) in Ireland and France, respectively. EirGrid and RTE are joint Project Promoters of the Project, although for the purpose of the Foreshore Licence Application, EirGrid is the sole Applicant.

The Celtic Interconnector cable route is approximately 497 kilometres (km) long with 35km in Ireland's Territorial Waters, 116km in the Irish Exclusive Economic Zone (EEZ), 211km in the United Kingdom's (UK) EEZ, 87km in the French EEZ, and 48km in French Territorial Waters (all distances stated are approximate). The cable route does not enter the Territorial Waters of the UK.

A detailed description of the project is provided in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall and Chapter 6: Description of the Offshore Cable.

1.2 Project Need

The need for, and the benefits of the Proposed Development are summarised below and are further discussed in Volume 3D Part 2 EIAR for Ireland Offshore (Introductory Chapters) - Chapter 2: Project Need. The proposed Celtic Interconnector Project as a whole, with an estimated cost of €1Bn. +/- 10%, is recognised as a Project of Common Interest (PCI) by the European Union. In addition, it will:

- Support Europe's transition to the Energy Union;
- Increase competition in the electricity market by applying downward pressure on the cost of electricity to the benefit of consumers in Ireland, France and Europe;
- Enhance the security of supply for both Irish and French electricity consumers;
- Support Europe's transition to a low carbon energy future by increasing the market available for renewable electricity and supporting the development of the renewable energy sector; and
- Provide Ireland's only energy connection to an EU Member State following the UK's departure from the EU.

1.3 Foreshore Licence application process

In Ireland, the marine components of the Proposed Development require the submission of a Foreshore Licence application under the Foreshore Act 1933 (as amended) to Foreshore Unit (MEFU) within the Department of Housing, Local Government and Heritage (DHLGH) as the regulator for activities in the Irish foreshore.

1.4 Purpose of the Planning and Consultation Report

The purpose of this Planning and Consultation Report ('the Report') is to provide a summary of the planning policies of relevance to the Foreshore Licence Application and confirm how the Proposed Development meets these policy requirements.

The Report also provides summary of the engagement and consultation carried out to support the development of the Foreshore Licence Application. This includes EirGrid's engagement with MEFU and other statutory and non-statutory consultees as part of the Foreshore Licence application process. The Report sets out how EirGrid has had regard to the comments received in the development of the application.

1.5 Jurisdiction of Foreshore Unit

As confirmed by the Foreshore Unit during the pre-application consultation phase, the jurisdiction of Foreshore Unit in respect of the proposed development is the High Water Mark (HWM).

As per Figure 1.1 below, a HWM, based on OSI 25" series mapping (1888-1913) is shown as a yellow line that currently extends over the existing car park at Claycastle Beach, suggesting that there may have been some subsequent historic land reclamation. The pink line comprises a HWM using OSI data from 2020.

From a Legal perspective, a HWM can only be amended by a Maritime Order. No such Maritime Order(s) have been identified which amend the HWM in this area. As such, the HWM based on the OSI 25" series mapping (1888-1913) remains the Legal delineation of the jurisdictional boundary.

Notwithstanding the Foreshore Unit's jurisdiction for the purposes of deciding on this Foreshore Licence application for Approval, the extent of the red line boundary on the foreshore licence application drawings demarcated as "Area A" on Drawing No. 400584-PL-DWG-009 Rev. D extends to the 25" historic HWM (yellow line) as agreed with the Foreshore Unit.

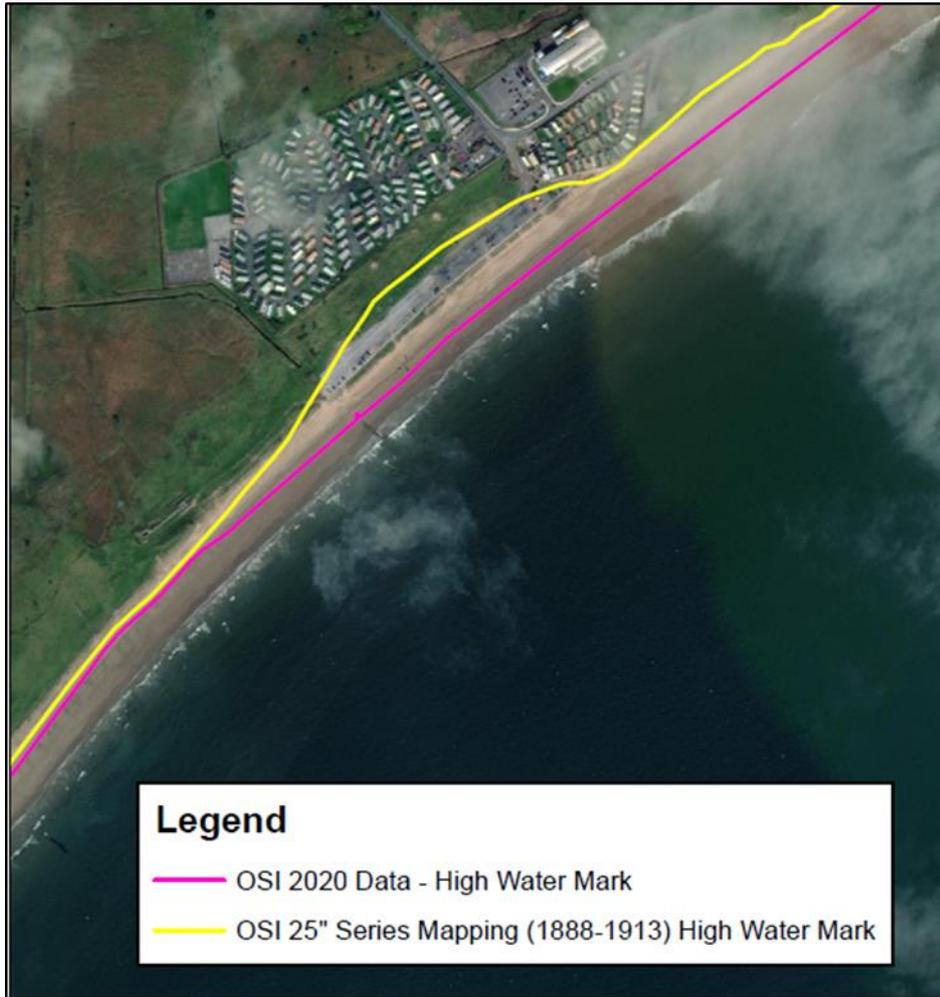


Figure 1.1: Aerial view of the area of Claycastle Beach identifying OSI High Water Marks (HWMs)

2 Planning Policy

2.1 Introduction

This section of the report summaries the legislation and planning policies that are relevant to the delivery of the marine activities of the Proposed Development within the Irish foreshore.

2.2 Legislative Context

2.2.1 TEN-E Regulation (EU) 347/2013¹ – Trans-European Networks for Energy

The European Union (EU) recognised the Celtic Interconnector as a whole as a Project of Common Interest (PCI) under the guidelines for trans-European energy infrastructure EU 347/2013 (TEN-E Regulation). EirGrid is required to make a 'draft application file' available to consultees and the public for comment as part of the PCI process, which is co-ordinated by An Bord Pleanála as the National Competent Authority (NCA). The draft application file included the documents forming part of the Foreshore Licence Application.

2.2.2 Foreshore Act 1933, as amended

The Irish marine components of the Celtic Interconnector require consent under the Foreshore Act 1933, as amended.

New legislation is being prepared to replace the Foreshore Act 1933, as amended (known as the Maritime Area Planning Bill and the Maritime Jurisdiction Bill); however, this has not commenced at the time of submission of the Foreshore Licence application to DHLGH.

2.2.3 EIA Directive 2014/52/EU

The Proposed Development does not qualify as EIA development under Annex I or II of the EIA Directive. However, EirGrid are submitting an Environmental Impact Assessment Report (EIAR) (Volume 3D EIAR for Ireland Offshore) on a voluntary basis due to the large-scale and transboundary nature of the Proposed Development.

2.2.4 The Marine Strategy Framework Directive 2008/56/EC

The Marine Strategy Framework Directive aims to achieve Good Environmental Status (GES) of the EU's marine waters by 2020 and protect the resource bases upon which marine related economic and social activities depend.

To achieve GES by 2020, each Member State is required to develop a strategy for its marine waters (or Marine Strategy). In addition, because the Directive follows an adaptive management approach, the Marine Strategies must be kept up-to-date and reviewed every six years.

¹ Regulation (EU) No. 347/2013 of the European Parliament and of the Council of 17 April 2013 on guidelines for trans-European energy infrastructure and repealing Decision No. 1364/2006/EC and amending Regulations (EC) No 713/2009, (EC) No 714/2009 and (EC) No 715/2009.

2.2.5 Maritime Spatial Planning Directive 2014/89/EU

The Maritime Spatial Planning Directive (MSPD) establishes a framework for maritime spatial planning across the EU member states. The Directive requires European Member States to develop Maritime Spatial Plans by 31 March 2021. It sets out the fundamental elements that must be reflected in Maritime Spatial Plans including the promotion of the coexistence of relevant uses and activities.

2.2.6 Framework for Maritime Spatial Planning Regulations 2016

Ireland has transposed the Marine Spatial Planning Directive into the Framework for Maritime Spatial Planning Regulations. Under the Regulations, the Minister for Housing, Planning and Local Government is the competent authority for the purposes of the Directive and, by extension, for purposes of preparing Ireland's first maritime spatial plan. Marine planning will enable the Government of Ireland to set a clear direction for managing Irish seas informing decisions about the current and future development of the marine area, aiming to integrate social, economic, and environmental needs.

There are four stages in the development and implementation of marine spatial planning in Ireland:

- Publication of a roadmap outlining a proposed approach to developing Ireland's first marine spatial plan;
- Publication of an evidence and issues overview, a full plan in draft and public consultation;
- Preparation of a final plan with supporting environmental assessments for submission to Government and then to the European Commission ahead of the March 2021 deadline set out under the MSP Directive; and
- Implementation of the final Marine Spatial Plan.

See further explanation under National Marine Planning Framework in Section 2.3.1.

2.3 Policy Context

2.3.1 European Policy

Energy Union Package COM (2015) 80

The Energy Union Package Framework Strategy aims to give European Union (EU) consumers, households and businesses, secure, sustainable, competitive, and affordable energy. The strategy includes a specific minimum interconnection target has been set for electricity at 10% of installed electricity production capacity of the Member States, which should be achieved by 2020. The latest State of the Energy Union report, published 14 October 2020, looks at the energy union's contribution to EU's long-term climate goals and stated that eight EU member states, including Ireland, have failed to meet the 10% interconnection target for 2020.

2.3.2 National Policy

National Planning Framework 2018

The goal of the National Planning Framework (NPF) is to inform and guide sustainable (economic, social, and environmental) planning and development. There are 10 national strategic outcomes set out in the planning framework including the transition to a low carbon and climate resilient society.

National Development Plan 2018 – 2027

The NPF is accompanied by the National Development Plan (NDP) which sets out the investment priorities that will underpin the implementation of the NPF. The Celtic Interconnector Project as a whole is referenced as one of the Major National Infrastructure Projects supporting the transition to a low-carbon and climate resilient society.

National Policy Position on Climate Action and Low Carbon Development 2013 (updated 2021)

This National Policy Position (NPP) establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPP stresses the importance of harnessing the energy potential and deliver demand from Ireland's natural energy sources such as wind, wave and solar, new energy systems and transmission grid.

Government White Paper – Ireland's Transition to a Low Carbon Energy Future 2015 - 2030

The Government White Paper sets out a framework to guide Ireland's energy policy development. The White Paper acknowledges that an uninterrupted supply of energy is vital to the functioning of Irish society and economy.

Climate Action Plan 2019

The objective of the Plan is to enable Ireland to meet its EU targets to reduce its carbon emissions by 30% between 2021 and 2030 and drive forward the achievement of net zero carbon emissions by 2050. The action plan recognises that new infrastructure will need to be in place to achieve the Government of Ireland's ambition.

National Policy Statement on Electricity Interconnection (2018)

This NPS details the current position of electricity interconnection in Ireland. The policy statement sets out how Ireland will seek to continue to benefit from the strategic and economic benefits of electricity interconnection, while aligning with EU energy targets on interconnection and decarbonisation.

Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure 2012

This statement published by the Department of Communications, Energy and Natural Resources (DECC), underlines the need and urgency for new energy infrastructure in the national interest and in the interests of individual consumers.

National Marine Planning Framework (Draft)

In accordance with the Framework for Maritime Spatial Planning Regulations 2016, a draft Marine Planning Policy Statement outlining the future development of the marine planning system has been published by the DHLGH and subject to public consultation. It is currently at Stage 3 of development process (finalisation) prior to implementation. The proposed reform of national planning of the marine environment will create a national plan of Ireland's maritime area, which will be known as the National Marine Planning Framework (NMPF). The NMPF will establish an overarching plan for the entire Irish marine area, to function as the maritime counterpart to the National Planning Framework. The NMPF will set long-term objectives for the sustainable development of Ireland's maritime area over a 20-year term.

2.3.3 Regional Policy

Southern Regional Assembly Spatial and Economic Strategy 2020

The Regional Spatial and Economic Strategy for the Southern Region (RSES) sets out a 12-year strategic regional development framework for the Southern Region of Ireland. The primary aim of the RSES is to support and implement the NPF and NDF.

The Celtic Interconnector Project is referenced in Regional Policy Objective (RPO) 223 – International Energy Interconnection Infrastructure.

RPO223 - It is an objective to support the sustainable development of international energy interconnection infrastructure and support the sustainable development (subject to appropriate environmental assessment and the planning process) of the Celtic Interconnector project between Ireland and France from a location in the Region.

The transboundary nature of the Celtic Interconnector project is also referenced in RPO220 – Integrated Single Electricity Market (I-SEM):

RP0220 – It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seeks the sustainable development and reinforcement of the energy grid including grid connection, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.

2.3.4 Local Policy

Cork County Council Development Plan 2014

This Development Plan is relevant to the location in which the Celtic Interconnector Project will be sited. Objective ED 6-1: Electricity Network states:

- Support and facilitate the sustainable development, upgrade and expansion of the electricity transmission grid, storage, and distribution network infrastructure;
- Support the sustainable development of the grid including strategic energy corridors and distribution networks in the region to international standards;

- Facilitate where practical and feasible infrastructure connections to wind farms and other renewable energy sources subject to normal proper planning considerations; and
- Proposals for development which would be likely to have a significant effect on nature conservation sites and/or habitats or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.

Draft Cork County Development Plan 2022 – 2028

A background document has been prepared on Energy (Background Document No.9) for the purposes of the Pre-Draft Plan public consultation and preparation of the Draft Plan. The Draft Development Plan is currently (June 2021) available for public consultation.

The key issues for the review of Development Plan set out in the Background Document included the need to support improvements to the transmission network including electricity transmission grid, gas infrastructure, the storage and distribution network and international energy interconnection infrastructure. It also states that the Plan needs to safeguard strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

In addition to these general references to the promotion of interconnection, the Draft Plan includes a specific supportive policy regarding the Celtic Interconnector: Policy ET 13.23 states that it is a policy to “*Support the development of the Celtic Interconnector project linking the electricity transmission networks between Ireland and France as identified as a key project under Project Ireland 2040 for security of electricity supply, enhanced competition, and direct access to the EU Internal Energy Market*”.

2.3.5 Other Policy

All-Island Generation Capacity Statement 2019 - 2028

This statement was published by EirGrid and SONI (System Operator for Northern Ireland), outlining the expected electricity demand and the level of generation capacity that will be required on the island over the next ten years.

Strategy 2020-2025 Transform the power system for future generation

Published by EirGrid, this document sets out a strategic response to the transition of electricity generation to a sustainable low-carbon future. The primary goal of the strategy is to support the continued decarbonisation of electricity generation within Ireland in response to the climate crisis.

Transmission Development Plan 2019-2028

The Transmission Development Plan (TDP) fulfils EirGrid’s statutory obligation to deliver a plan for the development of the Irish transmission network and interconnections in line with the European Network of Transmission System Operators for Electricity. The Celtic

Interconnector is listed as one of four Irish Projects of Common Interest within the TDP aimed at ensuring the security and reliability of electricity supply.

2.4 Planning History

There is limited development history for the landfall site, the landfall location is partially made up of Claycastle beach; public carpark serving the beach, which has been in-situ for over 25 years; and undeveloped land between the public carpark and Summerfield Holiday Park.

2.5 Planning Applications

There is one development within the foreshore area of relevance to the Proposed Development – the Inis Ealga Marine Energy Park². This project is at the pre-application stage and a planning application is not due to be submitted until Q3 2023. The regard given to the Inis Ealga Marine Energy Park is outlined in the approach to the cumulative impact assessment Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) – Chapter 21: Summary of Transboundary and Cumulative Impacts.

2.6 Planning Appraisal

2.6.1 Project Need

The need for the Celtic Interconnector Project as a whole has been briefly outlined in Section 1.2 of this report and is further detailed in Volume 3D Part 2 EIAR for Ireland Offshore (Introductory Chapters) - Chapter 2: Project Need.

As a designated PCI, the Celtic Interconnector is considered a strategic development of European importance and will facilitate the movement of electricity between Ireland and France via a subsea cable. The project is required to promote the large-scale movement of electricity, strengthen the security of supply between countries, and support a more sustainable supply of electricity. Without the project, the electricity transmission network in Ireland and Europe would be constrained, and there would be a failure of the nation to provide a secure supply of electricity and facilitate connections for renewable energy projects, contributing to a low-carbon economy.

The need for the Celtic Interconnector is further emphasised at a national, regional, and local level in Ireland, including within the NDP, the NPS on Electricity Interconnection, the RSES and the Cork County Council Development Plan (see Section 2.3).

The need for the project is therefore firmly supported by the published and emerging planning policy framework.

2.6.2 Policy Accordance

As emphasised in Section 2.3, the need for the Celtic Interconnector Project is recognised at a European level through the TEN-E Regulations as a critical electricity transmission project. Within its latest report, the EU Energy Union Package highlights the failure of Ireland to meet

² <https://dpenergy.info/inisealga/>

its 10% interconnection target for 2020, and therefore there is an increased emphasis on the project to contribute towards the established interconnection targets.

At a national level, the NPF, NDP, and the NPS on Climate Action and Low Carbon Development provide strong support towards the transition to a low carbon and climate resilient society. The NDF specifically references the Celtic Interconnector as a major infrastructure project that is vital to contributing towards this goal.

The criticality of the low carbon agenda is further emphasised in the Government White Paper – Ireland’s Transition to a Low Carbon Energy Future and the Climate Change Action Plan 2019. The White Paper stresses the importance of maintaining an uninterrupted supply of energy, and ensuring diversification of energy supply, both aims being facilitated by the Celtic Interconnector Project.

The NPS on Electricity Connection recognises that few interconnectors exist in Ireland to provide strategic and economic benefits to the nation and provides support towards those that align with EU energy targets on interconnection and decarbonisation. The Celtic Interconnector Project will support an enhanced European scale transmission system.

At a regional level, the RSES provides specific recognition to the Celtic Interconnector as a project to reinforce the electricity transmission system for the nation and cross borders. The RSES acknowledges that the development of the Project is subject to the appropriate environmental impact assessment. This has been achieved through the completion of a robust EIAR (Volume 3D EIAR for Ireland Offshore) and Natural Impact Statement (NIS) for Ireland Offshore (Volume 6B).

At a local level, Policy ED 6-1 of the adopted Development Plan for Cork County Council provides support for the sustainable development of the electricity transmission grid. The Policy stresses that any Project likely to have a significant effect on nature conservation sites and/or habitats of high conservation value should be subject to an Appropriate Assessment. The Celtic Interconnector Project meets this test through the assessment carried out and presented in the NIS for Ireland Offshore (Volume 6B), which concludes that the likely significant effects identified will not affect the integrity of the European sites.

The future Development Plan for Cork County Council is currently (June 2021) at the public consultation phase. For the purpose of this application, the adopted Plan therefore remains relevant. The Background Document recognises the Celtic Interconnector Project as a Project that will support improvements to the electricity transmission network, and therefore it is anticipated that the Draft Plan will reflect this aspiration.

EirGrid operates the electricity grid in Ireland and has a duty to maintain and enhance transmission infrastructure to ensure it is fit for the future. EirGrid has a suite of policy and strategic development documents which set out how they intend to develop a sustainable transmission network. The Celtic Interconnector Project is specifically identified in the TDP as a PCI aimed at ensuring the security and reliability of electricity supply. It is also required to support the electricity demand requirements established in the All-Island Generation Capacity Statement 2019-2028. The Project will also support EirGrid’s aspiration to decarbonise electricity generation in response to the ongoing climate crisis.

There are strategic Directives at a European level present that seek to protect the marine environment and provide a revised planning framework against which marine activities should be considered. In response to the requirements of the Marine Strategy Framework Directive, a specific assessment has been produced, which demonstrates the Celtic Interconnector will not affect the ability of Ireland to achieve GES of the relevant objectives (Volume 8B- MSFD Assessment).

The marine planning framework in Ireland, required to accord with the MSPD, remains in the process of development. At the time of writing, a draft NMPF had been published which sets out the proposed approach to the future development of the planning system, including the adoption of a Marine Spatial Plan, however this has not been finalised or implemented. The draft NMPF recognises the proposed Celtic Interconnector and the benefits it will have on connectivity with other countries and Ireland's security of electricity supply.

2.7 Conclusion

The Planning Appraisal presented in Section 2.6 of this Report demonstrates the critical need for the Celtic Interconnector Project from a European, national, regional, and local level which is firmly supported and referenced within the established and emerging policy framework.

3 Consultation

3.1 Introduction

This section of the Report summarises the approach to consultation in relation to the Foreshore Licence Application. It explains the outcomes of the consultation and engagement undertaken as part of the pre-application process and explains how ‘due regard’ has been given to the comments received and how they have been taken into account in the ongoing development of the Proposed Development.

Further consultation has been undertaken to support the overarching PCI project, taking account of the onshore activities in Ireland, the works in the UK EEZ, and within French territorial waters. The outcomes of these consultation activities are provided in separate reports, which do not form part of the Foreshore Licence Application documents, but will form part of the draft application file submitted as part of the PCI process.

3.2 Legislation

3.2.1 Foreshore Regulations 2011

As part of their duty in determining the Foreshore Licence Application, MEFU within DHLGH has an obligation to consult a range of prescribed consultees as set out within the Foreshore Regulations 2011 SI No. 353/2011.

3.2.2 EIA Directive 2014/52/EU

The Foreshore Licence application is accompanied by a non-statutory EIAR. Although there is no legal requirement to undertake any consultation in accordance with the EIA Directive, EirGrid has considered it pertinent to engage with key environmental stakeholders in producing the EIAR.

3.3 Guidance

3.3.1 Framework for Grid Development

EirGrid has developed a bespoke ‘Framework for Grid Development’, which sets out how engagement with stakeholders and members of the public feeds into the development of a project. It sets the methods of engagement at the various stages in a project’s development, who will be consulted, and by what means.

3.4 Engagement with MEFU

EirGrid conducted regular engagement with the MEFU as the regulator for the Licence when preparing the Foreshore Licence Application. This section of the report provides a record of this engagement and explains how advice from MEFU was taken into account.

3.4.1 Meetings

A record of the meetings carried out with MEFU is set out in Table 3.1.

Table 3.1 Record of meetings with MEFU

Meeting date	Summary of advice received	Summary of how advice has been addressed
13 December 2018	EirGrid provided a summary of the Proposed Development and its justification, and the proposed programme of consents and subsequent development works, including the PCI process.	Not applicable.
April 2019	Information was provided by EirGrid on the Step 3 Consultation process, and additional information around selection of the preferred landfall option. Discussion was also held around the implementation of planned marine legislative changes, and their potential effects on the Proposed Development.	Not applicable.
8 July 2020	MEFU requested information on the materials intended for concrete mattressing (noting that Gabions disintegrate over time).	A description of concrete mattressing materials is provided in Section 2.2.8 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 6: Description of the Offshore Cable.
	MEFU advised that whilst the licencing process was only up to the 12nm territorial water, the Proposed Development should be considered in its entirety from an environmental perspective.	The EIAR has presented an environmental impact assessment of the Proposed Development as a whole, presented in Volume 3 Irish Territorial Waters and EEZ), Volume 4 for the UK EEZ, and Volume 5 for the French EEZ and Territorial Waters. Volumes 4 and 5 have not been provided as part of the Foreshore Licence Application but do form part of the PCI draft application file.
	MEFU advised that all qualifying interests and migratory species such as birds/cetaceans should be taken	An assessment of the effects on qualifying interests and migratory species is presented in Volume 3D

Meeting date	Summary of advice received	Summary of how advice has been addressed
	into account.	Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13: Biodiversity, and Volume 6B: NIS for Ireland Offshore.
	MEFU advised that fishing interests in Youghal will have to be considered.	An assessment of the effects on the fishing industry in Youghal, in particular the Classified Bivalve Mollusc Production Area is presented in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 19: Commercial Fisheries.
20 August 2020	MEFU outlined the approach to EIA screening and scoping.	The EIA screening and scoping process carried out by EirGrid reflects the advice received from MEFU.
	MEFU provided advice on the key consultees to engage with during the development of the Proposed Development.	The consultees identified by MEFU have been consulted as part of the Proposed Development and the responses have informed the EIAR.
05 November 2020	MEFU and EirGrid discussed difficulties in engaging with the Naval Service to obtain more information on UXO management procedures and MEFU agreed to contact the Naval Service regarding this matter.	See details against the 1 February 2021 meeting below.
	A detailed update on the Proposed Development was provided by EirGrid, including a summary of the Step 4A Consultation Report, and the ongoing public consultation and engagement.	Not applicable.
	A summary of the topics and effects scoped in and out of the EIAR was presented, with confirmation sought on this.	Not applicable.
	EirGrid also sought confirmation on the proposed contents of the Consents Pack, to be submitted in early 2021.	Not applicable.
1 February	MEFU confirmed that the Foreshore	The application will follow the

Meeting date	Summary of advice received	Summary of how advice has been addressed
2021	Act 1933 will remain the relevant consenting route if the application is submitted in May 2021 or up to the middle of 2021.	requirements of the Foreshore Act 1933 if submitted before the middle of 2021.
	MEFU confirmed that they would not be issuing a Scoping Opinion to EirGrid, but they would provide a copy of all consultation responses received.	EirGrid will take account of the scoping consultation responses in the Foreshore licence application (see Table 3.3).
	MEFU agreed to issue the most up to date Foreshore Licence Application Form.	The most up to date application form will be adopted for the application.
	MEFU requested copies of draft drawings for review.	Draft drawings were provided to the Unit for comment in February 2021.
	A request was made to confirm the correct licence number.	EirGrid confirmed via email to MEFU on 05 February 2021 that the correct licence number was FS006916. This has been included on the licence application form.
	MEFU agreed to review correspondence received from the Navy and confirm what legislation / methodology was required to deal with UXO.	Verbal confirmation following the meeting was given that the possibility of requiring UXO clearance should be included within the EIAR. This assessment is presented as Appendix 11A of Volume 3D Part 2 EIAR for Ireland Offshore – Chapter 17: Noise and Vibration.
	The Unit advised that UXO could be dealt with in the licence if it has been assessed in the EIAR and NIS documents.	Measures to address the potential presence of UXO are included in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 15: Archaeology & Cultural Heritage). The biodiversity assessment concluded that the presence of UXO is not expected, and scopes UXO out for further assessment, including in the NIS.
	The Unit confirmed that they would advise on the definition of the High Water Mark for the purpose of the licence application following the	This guidance has been received from the MEFU and taken into account when finalising the draft drawings.

Meeting date	Summary of advice received	Summary of how advice has been addressed
	submission of the draft drawings. The Unit advised that they would send a copy of guidance on the HWM to EirGrid.	
	The Unit advised EirGrid to continue consultee engagement to address any issues that may arise through MEFU's consultation process.	EirGrid will continue engagement with stakeholders throughout the remainder of the pre-application phase prior to submission of the Foreshore Licence Application.
18 May 2021	The Unit confirmed their understanding and agreement of the Proposed Development's roadmap, as presented by EirGrid, and requested that any changes to this be advised.	EirGrid will continue engagement with the Unit, ensuring that any changes to proposed programmes or plans are advised at the earliest opportunity.
	The Unit advised that the next step is submission of the EIAR and supporting documents, to be followed by appropriate public advertising and placing of EIAR documentation in appropriate locations for public review.	EirGrid confirmed that they will make the documentation publicly available in suitable locations, and advertise appropriately.

3.4.2 Correspondence

A record of relevant correspondence received from the MEFU is set out in Table 3.2.

Table 3.2 Record of correspondence with the MEFU

Date of correspondence	Summary of advice received	Summary of how advice has been addressed
13 October 2020	MEFU confirmed the list of prescribed consultees in respect to S.I. No. 353/2011 Foreshore Regulations 2011.	The consultees identified by MEFU have been consulted as part of the Proposed Development and the responses have informed the EIAR.
3 February 2021	MEFU confirmed that five consultation responses had been received as a result of their consultation on the scoping report.	See Table 3.3 below for a summary of how the advice received by both the Foreshore Unit and the Applicant during the scoping consultation process was

Date of correspondence	Summary of advice received	Summary of how advice has been addressed
		taken into account.

3.5 Approach to stakeholder engagement

3.5.1 Defining stakeholders

Table 4.1 in the EIAR Scoping Report set out the key stakeholders that EirGrid proposed to consult and engage with in developing the Foreshore Licence.

This included the prescribed consultees who will be formally consulted by MEFU following the submission of the Foreshore Licence Application. These consultees were confirmed by MEFU via email on 13 October 2020 (see Table 3.2).

Additional stakeholders have been identified since the EIAR Scoping Report was produced, for example, where a material asset was identified within the study area that merited consultation with the owner/operator. The final list of consultees and the anticipated focus of engagement is set out in Table 3.3.

Table 3.3 Key stakeholders

Stakeholder	Engagement focus
MEFU of Department of Housing, Local Government and Heritage (DHLGH)	General information about the Proposed Development – both in terms of application progress, stakeholder engagement activities and approach to the Foreshore Licence application.
Underwater Archaeology Unit (UAU) and Nature Conservation Unit of the National Monuments Service (NMS) of DHLGH	An email was received from the NMS' UAU on 8 January 2021, providing their response to the general scoping engagement consultation. The focus of this was on underwater cultural heritage, including known and potential wreck locations, anomalies identified during surveys which may have archaeological potential, and future archaeological monitoring / testing to be undertaken on the Proposed Development. Subsequent discussions were held with representatives of the NMS, UAU, and EIAR documentation updated accordingly.
Department of Environment, Climate and Communications	On 22 December 2020, the Department provided feedback to the Foreshore Unit following receipt of their scoping request. This summarised their view that “development of the Celtic Interconnector does not require Ministerial Consent under Section 5 of the Continental Shelf Act.” They also advised EirGrid of the requirement to engage with the Petroleum Affairs Division at DECC, and provided contact details. EirGrid was also advised that

Stakeholder	Engagement focus
	engagement would be necessary with the Department of Culture, Heritage and the Gaeltacht regarding the cable's route on the Irish Continental Shelf.
Aquaculture and Foreshore Management Division of Department of Agriculture, Food and the Marine	On 12 February 2021, the Department provided feedback to the Foreshore Unit following receipt of their scoping request. This noted their concern around: potential effects on the shrimp fishery; the need for fishers to be able to access the area following cable burial; the need to consult with local fishing groups; the identification of post-consent monitoring requirements; and the need to include consideration of electromagnetic fields (EMF) in the EIAR.
An Chomhairle Ealaíon (Arts Council of Ireland) Commission for Regulation of Utilities Health Service Executive Minister for Agriculture, Food and the Marine Minister for Culture, Heritage and the Gaeltacht Minister for Transport	General information about the Proposed Development; feedback on key topics of interest and engagement activities to resolve any issues prior to submission of Foreshore Licence application.
An Taisce (National Trust for Ireland) National Parks and Wildlife Service	Feedback on key topics of conservation and heritage interest, including marine ecology and NIS, and engagement activities to resolve any issues prior to submission of Foreshore Licence application.
Cork County Council	General information about the Proposed Development; feedback on key topics of interest and engagement activities to resolve any issues prior to submission of Foreshore Licence application. In particular to discuss protection of Claycastle beach Blue Flag status.
Environmental Protection Agency	General request for comments on planning and environment.
Fáilte Ireland (National Tourism Development Authority of Ireland)	To seek feedback about potential impacts on tourism and to ensure correct approach in EIAR; engagement activities to resolve any issues prior to submission of Foreshore Licence application.
Irish Coast Guard Irish Maritime Administration Marine Safety Policy Division Marine Survey Office Marine Survey Office Administration Maritime Services Division Maritime Transport Division	To seek feedback concerning navigational safety (including recreational boating) and to ensure correct approach in EIAR; engagement activities to resolve any issues prior to submission of Foreshore Licence application.

Stakeholder	Engagement focus
Mercantile Marine Office	Specific comments were received from the Marine Survey Office, confirming that they had no objections from a navigational perspective, but that the installation process may have a short-term impact on marine traffic. Therefore, a number of requirements were set out, including: issue of marine notice through the Irish Maritime Administration; undertake full consultation with Youghal and associated harbour authorities; liaise with the Irish Coast Guard regarding navigation warnings; and provide a list of all vessels associated with the Proposed Development to the Marine Survey office.
Marine Institute	On 3 February 2021, the Marine Institute provided feedback to the Foreshore Unit following receipt of their scoping request. This was focused around interactions with fisheries and aquaculture operations, and noted that: the extent of fisheries likely to be affected should be identified; consultation should be undertaken with local fishing groups; post-consent monitoring should be identified; effects of EMF should be considered on sensitive species.
Heritage Council National Monuments Service Underwater Archaeology Unit of the National Monuments Service	To seek feedback about potential impacts on marine archaeology and heritage and to ensure correct approach in EIAR; engagement activities to resolve any issues prior to submission of Foreshore Licence application
Irish Sea Fisheries Board South Western Fisheries Board Sea Fisheries Protection Authority Inland Fisheries Ireland	To seek feedback concerning potential impacts on commercial fisheries and to ensure correct approach in EIAR; engagement activities to resolve any issues prior to submission of Foreshore Licence application.

3.5.2 Approach to consultation

The stakeholders identified in Table 3.3 were issued a consultation letter (an example of which is provided as **Appendix 3A**) inviting comments on the Proposed Development and an opportunity to feed into the EIAR.

The consultation letter provided a brief overview of the Proposed Development and the Project Promoters. It also provided a link to a dedicated project page on EirGrid's website³, where the stakeholder could find out more information on the Proposed Development.

Stakeholders were invited to provide comments on the Proposed Development in writing and were offered a meeting with EirGrid to discuss these if required. Given the COVID-19 restrictions in 2020-2021, all stakeholder meetings were carried out as online video meetings rather than face-to-face.

3.6 Record of Engagement for the Irish Foreshore Licence Application

A summary of all stakeholder meeting and correspondence received in relation to the development of the Foreshore Licence Application is summarised in Table 3.4.

³ www.eirgridgroup.com/the-grid/projects/celtic-interconnector/the-project/

Table 3.4 Summary of stakeholder engagement

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
An Chomhairle Ealaíon (Arts Council of Ireland)	EirGrid issued a consultation letter on 26 November 2020. No response received.	N/A	N/A
An Taisce (National Trust for Ireland)	EirGrid issued a consultation letter on 25 November 2020. Email received from stakeholder on 26 November 2020.	The consultation letter was acknowledged – no specific comments were provided.	N/A
Commission for Regulation of Utilities	EirGrid issued a consultation letter on 26 November 2020. Email received from stakeholder on 8 December 2020.	The consultation letter was acknowledged – no specific comments were provided.	N/A
Cork County Council (CCC)	Meeting held between EirGrid and CCC on 23 November 2020. A copy of the meeting minutes is provided in Appendix 3B)	CCC raised concerns regarding the extraction of peat on Claycastle Beach and asked if leaving a hole would cause a safety issue.	Any excavated holes on the beach would be backfilled with sand (see Section 5.1.1 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall.
		CCC asked whether works in the carpark could be done outside of	Phase 1 of the Irish landfall installation would take place in

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		the busy summer season and queried what the 'worst' case for reduced beach access would be.	the winter months (see Section 5.5.1 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall). Phase 2 of the landfall installation must take place in the summer months to coincide with favourable weather windows (see Section 5.5.2 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall).
		CCC requested that activities on the beach should be programmed around events such as the IronMan scheduled for 13-15 June 2021.	Landfall installation works are not programmed to take place until 2025 which will allow events to be programmed around installation activities (see Section 5.5.2 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall.).
		CCC queried whether HDD would be an option for installation of the	EirGrid confirmed in the meeting that HDD was a low feasibility

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		cable at the beach.	option due to the bathymetry and a pull in vessel for cable installation was preferred. A description of this activity is provided in (see Section 5.1 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall.).
		CCC queried whether jetting is a possibility for cable installation in place of open cut trenching.	EirGrid confirmed that it would be difficult to retain the correct buoyancy of the cable using jetting and therefore open cut trenching was the preferred technique. A description of this activity is provided Section 5.1 in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 6: Description of the Offshore Cable.
Department of Defence	Email received from stakeholder on 15 October 2020.	EirGrid contacted the Department seeking input on Submarine Cable Systems. The Department confirmed that they are no longer	EirGrid contacted the DCCAE via email on 19 October 2020 following the advice from the Department of Defence (see next

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		the contact for such projects and applications should be made to the Department of Environment, Climate Action & Communications (DECC).	row).
Department of Environment, Climate Action and Communications (DECC)	Email received from stakeholder on 2 November 2020.	DECC confirmed that they were not the appropriate Department to speak to regarding the Proposed Development and advised that matters should be directed to MEFU.	Response noted.
		DECC advised that the Petroleum Affairs Division of DHLGH should also be contacted to ensure no conflicts with current or planned uses of the seabed for hydrocarbon exploration/production activities.	EirGrid consulted the Division on 22 December 2020. The Division responded on 6 January 2021 to confirm that the Proposed Development did not cross any currently licenced areas, provided information on the closest well approach and the closest suspended well. In addition, the Division confirmed the North Celtic Sea Protection of Installation orders. This information has been captured in

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
			Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 16: Material Assets.
		DECC drew attention to online resources which map submarine cables such as https://kis-orca.eu/map/ .	Data held by the Kingfisher Information Service Offshore Renewable and Cable Awareness Project (KISCORCA) was referred to in 2020 and used to inform the assessment of material assets in the Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 16: Material Assets.
	Email received from stakeholder on 7 December 2020.	DECC confirmed that Ministerial Consent under Section 5 of the Continental Shelf Act is not required for the Celtic Interconnector Project.	Response noted.
	EIAR Scoping Report email response dated circulated by MEFU on 22 December 2020.	EirGrid is required to engage/consult with the Petroleum Affairs Division at DECC in respect of the	See response against DECC row above.

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
	(Appendix 3E).	<p>interconnector cable's proposed route and any planned uses of the seabed for hydrocarbon extraction activities.</p> <p>Engagement would be necessary with the Department of Culture, Heritage and the Gaeltacht with regard to any environmental issues in proximity to the proposed route of any cable on the Irish Continental Shelf.</p>	<p>The Department was issued a consultation letter on 26 November 2020. Please see relevant row for a summary of their advice.</p>
DP Energy	<p>Meeting held between EirGrid and DP Energy (22 January 2021).</p> <p>No meeting minutes were drafted for this meeting although DP Energy summarised the meeting discussions via email on 22 January 2021.</p>	<p>DP Energy provided a summary of available information on the Inis Ealga Marine Energy Park including the status of the Foreshore Site Investigation Application and a link to the available documents.</p> <p>DP Energy confirmed the timescale of their project – application submission in Q3 2023 with date of operation in 2023.</p>	<p>The assumptions shared by DP Energy have been factored into the cumulative assessment Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 22: Summary of Transboundary and Cumulative Impacts.</p>

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
Environmental Protection Agency (EPA)	Meeting held between EirGrid and the EPA (23 September 2020) A copy of the meeting minutes is provided in Appendix 3C .	EirGrid confirmed that the Proposed Development cannot be defined as an 'offshore installation'.	Comment noted.
		The EPA stated that Plough Dredging is a Licensable activity as it concerns the deliberate disposal of material at sea and anything that is deliberate is a licensable activity that requires a DaS Permit / License.	EirGrid issued email to EPA on 4 February 2021 confirming that no material would be disposed, and a Dumping at Sea Licence is not required. The EPA responded on 17 February 2021 to confirm their agreement that a Dumping at Sea Licence would not be required.
		The EPA suggested that if there is disposal of material as part of the Proposed Development, beneficial uses should be considered for this. The EPA referenced the EPA STRIVE report by Cork Institute of Technology, 'Guidance on the Beneficial Use of Dredge Material in Ireland as a document that may assist.	See response above.

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		The EPA confirmed their jurisdiction in relation to a DaS permit both the Irish Territorial Waters and the Irish EEZ.	See response above.
		The EPA advises that moving sand, via sand-wave sweeping in the Irish EEZ and this material is not reused, this activity likely requires a DaS Permit.	See response above.
	Meeting held between EirGrid and the EPA (14 October 2020). A copy of the meeting minutes is provided in Appendix 3C .	The EPA advised that it should be determined whether a Dumping at Sea Licence is required. EirGrid advised that there would be no deliberate disposal of material at sea.	See response above.
	Email received from stakeholder on 20 January 2021.	The EPA requested clarification on what EPA consents are required for the onshore and offshore elements.	See response above.
Fáilte Ireland (National Tourism Development Authority of Ireland)	EirGrid issued a consultation letter on 26 November 2020. No response received.	N/A	N/A

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
Health Service Executive	EirGrid issued a consultation letter on 26 November 2020. Email received from stakeholder on 26 November 2020.	An automated response was received confirming receipt of the email.	N/A
Heritage Council	EirGrid issued a consultation letter on 25 November 2020. Email received from stakeholder on 26 November 2020.	The Heritage Council confirmed that they would be unable to comment due to a lack of resources.	N/A
Inland Fisheries Ireland (IFI)	EirGrid issued a consultation letter on 26 November 2020. Email received from stakeholder on 1 December 2020.	IFI confirmed that they would assess the details of the project at the application stage.	N/A
Irish Coast Guard	EirGrid issued a consultation letter on 26 November 2020. No response received.	N/A	N/A
Irish Maritime Administration	EirGrid issued a consultation letter on 26 November 2020. No response received.	N/A	N/A
Irish Sea Fisheries Board	EirGrid issued a consultation letter on 26 November 2020.	N/A	N/A

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
	No response received.		
Irish Whale and Dolphin Group (IWDG)	Email received from stakeholder on 4 December 2020.	The IWDG requested a copy of the Marine Mammal Observer and Passive Acoustic Monitoring reports and data sheets from offshore surveys already completed to better inform route proposals.	The Group will be issued a copy of the final EIAR which will contain the relevant information.
		The IWDG recommended a conservative approach to mitigation and provided their offshore windfarm policy document which included advice on this matter.	The Group's policy has been taken into consideration in the preparation of the Biodiversity assessment (Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13 Biodiversity).
	Email received from stakeholder on 15 January 2021.	The IWDG requested confirmation on the regulatory framework for the Proposed Development.	EirGrid provided a response by email on the 3 February 2021 confirming the regulatory position.
	Email received from stakeholder on 3 February 2021.	The IWDG acknowledged the clarification provided by EirGrid in the email dated 3 February 2021.	The DECC contact details were issued to the IWDG on 17 February 2021.

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		They sought clarity on contacts within DECC to discuss the regulatory position.	
Kinsale Energy Ltd	EirGrid issued a consultation letter on 25 November 2020. No response received.	N/A	N/A
Marine Institute (MI)	EirGrid issued a consultation letter on 26 November 2020. No response received, however, contents of MI response to the Foreshore Unit as detailed in Table 3.3 is noted.	N/A	N/A
Marine Safety Policy Division	EirGrid issued a consultation letter on 26 November 2020. Email received from stakeholder on 9 December 2020.	In response to the consultation letter, the Division advised that they are not normally involved in the EIA of projects and suggested that the matter is raised with DHLGH (MEFU).	N/A
Marine Survey Office (MSO)	EIAR Scoping Report email response circulated by MEFU on 22 December 2020 (Appendix	The MSO requested the publication of a marine notice through the Irish Maritime Administration providing a general	A Fisheries Liaison Officer will be appointed and there will be regular Notice to Mariners (see Section 15.11 in Volume 3D Part

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
	3D).	description of operations and approximate dates of commencement and completion.	2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 19: Commercial Fisheries).
		The MSO recommended consultation with Youghal and associated harbour authorities.	EirGrid will consult with Youghal and associated harbour authorities as appropriate throughout the project's lifespan.
		The MSO recommended liaison with the Irish Coast Guard to arrange the broadcast of appropriate navigation warnings to advise marine traffic approaching the works area.	The Irish Coast Guard was issued a consultation letter on 27 November 2020. Please see relevant row for a summary of their advice.
		The MSO requested a list containing the names of all vessels associated with the installation within the territorial seas, including proposed interaction with an Irish Port Facility. The M.S.O. Dublin will then make an assessment regarding the requirements if any	A summary of the vessels that would be utilised during the cable installation is provided in Section 5.4.3 of Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall and Chapter 6: Description of the

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		in relation to Irish Load Line Certification and possible passenger boat licence requirements.	Offshore Cable.
Marine Survey Office Administration	EirGrid issued a consultation letter on 25 November 2020. No response received.	N/A	N/A
Maritime Services Division	EirGrid issued a consultation letter on 25 November 2020. No response received.	N/A	N/A
Maritime Transport Division	EirGrid issued a consultation letter on 25 November 2020. No response received.	N/A	N/A
Mercantile Marine Office	EirGrid issued a consultation letter on 25 November 2020. No response received.	N/A	N/A
Minister for Agriculture, Food and the Marine	Email received from stakeholder on 27 November 2020.	The Department confirmed that they had received documentation from DHLGH regarding the EIAR scoping request and confirmed they would respond to DHLGH if	DHLGH have not issued any scoping correspondence from the Agriculture, Food and the Marine Department and therefore it is assumed they had no comments

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		there were any comments relevant to the possible impact on fisheries and or aquaculture.	to raise.
	EIAR Scoping Report email response circulated by MEFU on 16 February 2021 (Appendix 3E).	The Department recommended that cable laying to shore should be done from March to October so that the shrimp fishery is not affected	The EIAR addresses this in Chapter 19: Commercial Fisheries.
		The Department requested that once the cable is installed, access to the fishing grounds must be resumed unhindered.	The EIAR addresses this in Chapter 19: Commercial Fisheries.
		The Department requested no exclusion zones.	The EIAR addresses this in Chapter 19: Commercial Fisheries.
		The Department advised that the extent of the fisheries likely to be impacted should be identified and local fishermen should be consulted.	Local fishing groups have been consulted with regards to the Proposed Development; this is documented both above, and in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 19:

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		<p>The Department requested that post-consent monitoring should be undertaken to reduce uncertainty identified in the [Scoping] Report,</p>	<p>Commercial Fisheries.</p>
		<p>The Department advised that the impacts of electromagnetic fields on sensitive species should be examined.</p>	<p>Potential effects of EMF have been considered within Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) – Chapter 19: Commercial Fisheries.</p>
<p>Minister for Culture, Heritage and the Gaeltacht (DCHG)</p>	<p>Email received from stakeholder on 16 December 2020.</p>	<p>DCHG requested an Underwater Archaeological Impact Assessment (UAIA) and set out a list of factors that they expected to see within the assessment.</p>	<p>An assessment of underwater archaeological remains and deposits of geoarchaeological or palaeoenvironmental interest has been undertaken and is presented in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 15 Archaeology & Cultural Heritage. This assessment considers the potential effects of the proposed</p>

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
			<p>development on the peat deposits and associated archaeological remains on the foreshore at Claycastle Beach, submerged land surfaces and marine archaeological remains. Mitigation of disturbance of peats and submerged land surfaces would be through the implementation of an agreed programme of archaeological investigation under licence from the NMS. Proposals developed with regard to advice from the NMS for monitoring marine construction works to allow for appropriate archaeological intervention where archaeological remains or deposits are identified are set out in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 15 Archaeology and Cultural and accompanying Appendices</p>

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		DCHG recognised that the intertidal portion of the cable route is outside of the Ballymacoda Bay SPA, but suggested that the EIA and NIS should consider birds of conservation concern use this area in winter and may be disturbed by the works.	A NIS has been produced and is presented in Volume 6B: NIS for Ireland Offshore and considers works within the intertidal area of the cable route.
		DCHG suggested that works should be carried out outside of the period where wintering birds may be present.	Works will be carried out in the winter period (Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 5: Description of the Landfall and Chapter 6: Description of the Offshore Cable) and the NIS for Ireland Offshore (Volume 6B) has assessed this as a worst-case scenario.
		DCHG advised that a NIS is submitted with the application.	An NIS has been produced and is presented in Volume 6B: NIS for Ireland Offshore.
		The Unit advised that the assessment should include	Full details of noise characteristics arising from the

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		<p>details of noise characteristics at source (i.e., sound pressure levels, sound exposure levels, frequency, bandwidth, duration of exposures) and information concerning propagation in air/water if applicable and proposed measures to mitigate the effects of noise.</p> <p>The unit advised that a suitability qualified marine mammal ecologist should be involved in undertaking the assessments.</p>	<p>installation of the Celtic Interconnector are provided within Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 17:Noise and Vibration, with an assessment of how this has the potential to affect marine wildlife (including marine mammals) presented in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13:Biodiversity. Full details of the team's experience is provided in Volume 3D1, Appendix 1A.</p>
Minister for Transport	<p>EirGrid issued a consultation letter on 25 November 2020.</p> <p>No response received.</p>	N/A	N/A
National Inshore Fisherman's Association	<p>EirGrid issued a consultation letter on 25 November 2020.</p> <p>No response received.</p>	N/A	N/A

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
National Monuments Service (NMS)	EirGrid issued a consultation letter on 26 November 2020. No response received, however, contents of the NMS response to the Foreshore Unit as detailed in Table 3.3 is noted.	N/A	N/A
National Parks and Wildlife Service (NPWS)	EirGrid issued a consultation letter on 26 November 2020. No response received. A meeting was held between EirGrid and representatives of the NPWS on 15 January 2021.	The Unit advised that a NIS should be submitted with the application. It was also noted that potential effects arising from underwater noise should be considered within the EIAR.	A NIS has been produced and is presented in Volume 6B: NIS for Ireland Offshore. Underwater noise is described and assessed within Volume 3D Part 2 EIAR for Ireland Offshore (Technical Chapters) – Chapters 13: Biodiversity, and 17: Noise and Vibration.
Nature Conservation Unit, DHLGH	EIAR Scoping Report email circulated by MEFU on 8 January 2021 (Appendix 3F).	The Unit advised that an assessment of impacts on marine mammals should be undertaken.	The marine mammals assessment is presented in Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13: Biodiversity.
		The unit advised that records of	Targeted surveys in the vicinity of

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		<p>survey should include the months when sampling occurred and the numbers of animals encountered in the vicinity of the proposed development.</p>	<p>the Celtic Interconnector were not undertaken. However, qualified Marine Mammal Observers were present on all surveys with the potential to disturb marine mammals, with the findings of these surveys included within the EIAR. This has been supported by a desk-based literature review. Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13: Biodiversity.</p>
		<p>The Unit advised that the assessment should include details of noise characteristics at source (i.e. sound pressure levels, sound exposure levels, frequency, bandwidth, duration of exposures) and information concerning propagation in air/water if applicable and proposed measures to mitigate the effects of noise.</p>	<p>Full details of noise characteristics arising from the installation of the Celtic Interconnector are provided within Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 17: Noise and Vibration, with an assessment of how this has the potential to affect marine wildlife (including marine mammals)</p>

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		The unit advised that a suitability qualified marine mammal ecologist should be involved in undertaking the assessments.	presented in Volume 3D Part 2 EIA for Ireland Offshore (Specialist Chapters) - Chapter 13: Biodiversity. Full details of the team's experience is provided in Volume 3D Part 1, Appendix 1A
Sea Fisheries Protection Authority	EirGrid issued a consultation letter on 25 November 2020. No response received.	The NMS provided extensive advice on known and potential wreck locations.	The EIA sets out the locations of recorded, identified and potential wreck sites within the CSC and a wider study area and has regard to the investigations and records cited by the NMS in their consultation (Volume 3D Part 2 EIA for Ireland Offshore (Specialist Chapters) - Chapter 15: Archaeology and Cultural Heritage).
Underwater Archaeology Unit of the National Monuments Service (NMS), DHLGH	EIA Scoping Report email circulated by MEFU on 8 January 2021 (Appendix 3G).	The NMS requested that a 100m Archaeological Exclusion Zone (AEZ) is placed around anomalies with archaeological potential. Where the anomalies are shallow (less than 50m depth) and a sufficient AEZ is not possible, the	Appropriate AEZ will be established around recorded and identified wreck sites and proposals for further investigation where AEZ cannot be avoided during construction area set out within Volume 3D Part 2 EIA for

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		anomalies should be subject to archaeological diver inspection.	Ireland Offshore (Specialist Chapters) - Chapter 15: Archaeology and Cultural Heritage.
		The result of all SI works should be subject to detailed archaeological interpretation, including geo-archaeological analysis, with results of this analysis submitted as Further Information to the National Monuments Service.	All SI work to date has been subject to archaeological interpretation. This has already been provided to NMS for comment and will be included as appendices to the EIAR. Any further SI works will be subject to an appropriate level of archaeological interpretation and analysis and results consulted with NMS. See (Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 15: Archaeology and Cultural Heritage).
		The identified potential 'metal' pot, located on the foreshore at Claycastle Beach, to be the focus of archaeological testing.	The potential 'metal pot' is located out with the working area of the proposed foreshore works. Therefore, it is proposed that mitigation be by demarcation of a

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
			buffer zone and avoidance, with a provision for excavation under licence where avoidance cannot be achieved. See Volume 3D Part 2 EIA for Ireland Offshore (Specialist Chapters) - Volume 3D EIA – Chapter 15: Archaeology and Cultural and accompanying Appendices.
		Foreshore: All works on the foreshore, for all cable landings to be the subject of archaeological monitoring.	Works on the foreshore will be subject to a programme of archaeological investigation to be agreed with NMS, to include monitoring where appropriate. See Volume 3D Part 2 EIA for Ireland Offshore (Specialist Chapters) - Volume 3D EIA – Chapter 15: Archaeology and Cultural and accompanying Appendices.
		Offshore: A proposal for the archaeological monitoring of the main offshore cable-laying works to be submitted to NMS for	Draft proposals for monitoring of offshore construction work are set out at Volume 3D Part 2 EIA for Ireland Offshore (Specialist

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
		consideration and approval.	Chapters) - Volume 3D EIAR – Chapter 15: Archaeology and Cultural and accompanying Appendices.
		The NMS should be provided with up-to-date mapping to indicate all agreed exclusion zones around identified known or potential wrecks, anomalies of cultural potential and areas of archaeological potential (i.e. such as exposed peats), etc.	Maps and plans of proposed exclusion zones will be supplied to NMS. The timing and format of this request remains under discussion with the NMS.
		The NMS advised that a NIS should be provided due to the proximity to the Blackwater River (Cork/Waterford SAC).	A NIS has been provided in Volume 6B: NIS for Ireland Offshore.
		The NMS provided extensive advice on the approach to assessing the effects on marine mammals.	These comments have been addressed in (Volume 3D Part 2 EIAR for Ireland Offshore (Specialist Chapters) - Chapter 13: Biodiversity.
		Meeting held between EirGrid and	The Unit requested a shapefile of

Stakeholder name	Form of engagement	Summary of engagement	Summary of how stakeholder comments have been addressed
	the NMS (5 March 2021).	the current cable route.	comply with this request.
US Naval Seafloor Cable Protection Unit	Email (20 November 2020)		

4 Conclusion

Having regard to the following:

- The requirements of EU energy law and energy policy, and in particular the designation of the overall planned Celtic Interconnector Project as a Project of Common Interest pursuant to EC Regulation No.347/2013;
- The provisions of Project Ireland 2040 – the National Planning Framework;
- The provisions of – the Draft National Marine Planning Framework;
- The provisions of the National Policy Statement on Electricity Interconnection (2018);
- The provisions of the Government White Paper - Ireland’s Transition to a Low Carbon Energy Future 2015-2030;
- The provisions of the Southern Regional Assembly Regional Spatial and Economic Strategy (RSES) in respect of electricity infrastructure and in specific respect of the Celtic Interconnector project (2020);
- The provisions of the Cork County Development Plan 2014 as varied, and the Draft Cork County Development Plan 2022-2028;
- The provisions of the Cobh and Midleton Municipal District Local Area Plans;
- The stated need for, and benefits of, the proposed development, namely:
 - Provide competition to the electricity market to the benefit of the Irish consumer,
 - Help Ireland to transition to a low carbon energy future,
 - Facilitate increased levels of renewable energy within the Irish and European electricity system,
 - Enhance the security of supply to Ireland,
 - Provide a direct telecommunication link to the European continent,
- The nature, scale and location of the proposed development, primarily as an underground cable (UGC) and associated infrastructure development;
- The nature of the receiving environment within which the UGC is proposed to be laid, including the area of Claycastle Beach the pattern of development in the area, and including any specific conservation and amenity designations along or in proximity to the proposed development;
- The consideration of alternatives for the design and routing/siting of the proposed development including in particular landfall and marine route options considered;
- Submissions and other input and advices received from statutory and non-statutory stakeholders during the project development process including the Foreshore Unit (MEFU) and Cork County Council, as well as from the general public, communities and landowners;
- The documentation prepared for the application for Statutory Approval, including the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS);

It is considered by EirGrid that, subject to compliance with the mitigation measures set out in the NIS and the EIAR, the proposed development:

- Would be in accordance with National policies and guidelines and with regional and local development plan policy;
- Would not seriously injure the amenities of the area or of property in the vicinity;
- Would not seriously injure the visual or recreational amenities of the area;
- Would not be prejudicial to public health or safety;
- Would not detract from the character or setting of features of architectural or archaeological heritage or the cultural heritage of the area;
- Would not seriously injure the biodiversity in the area; and,
- Would be acceptable in terms of traffic safety and convenience.

Having regard to the above, it is concluded by EirGrid that the proposed development would, therefore be in accordance with the proper planning and sustainable development of the area.

5 References

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Appendices



Celtic Interconnector

Volume 8A

Appendix A: Marine Survey Office EIR Scoping consultation letter

June 2021



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Tionscatal Éireann
Project Ireland
2040



The Oval, 160 Shelbourne Road, Ballsbridge, Dublin D04 FW28
Telephone: 01 677 1700 • www.eirgrid.ie

27 November 2020
Ref – 43171-WOOD-XX-XX-CO-OM-0001_S0_P01.1

Marine Survey Office
Department of Transport, Tourism and Sport
Leeson Lane
Dublin 2
D02 TR60

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Galway Technology Park, Parkmore
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Dear Sir / Madam,

We (Wood plc) are writing to you on behalf of EirGrid plc, to seek your views and any input that you may have to inform the Environmental Impact Assessment Report (EIAR) for the Celtic Interconnector project.

Who are EirGrid?

EirGrid is responsible for a safe, secure and reliable supply of electricity. EirGrid develop, manage and operate Ireland's electricity transmission grid. This brings power from where it is generated to where it is needed – throughout Ireland.

EirGrid uses the electricity transmission grid to supply power to industry and businesses that use large amounts of electricity. EirGrid also uses the electricity grid to power the distribution network. This supplies the electricity you use every day in your homes, businesses, schools, hospitals, and farms.

Who are Wood plc?

Wood plc is an environment and engineering consultancy that has been appointed by EirGrid to provide consenting, environmental assessment and technical design services for the marine or offshore components of the Celtic Interconnector, from the Mean High Water Mark (MHW) to the limit of Ireland's Exclusive Economic Zone (EEZ).

What is the Celtic Interconnector?

The Celtic Interconnector is a proposed link to allow for the movement of electricity between Ireland and France. The European Union has identified the 'France Ireland Interconnector' as being a Project of Common Interest (PCI) and the completion of the project is part of the current Programme for Government. It will send high voltage electricity as direct current (DC) using a subsea electricity cable. At either end of this cable, the electricity needs to be converted to alternating current (AC) so it can connect with the national grid.

The main elements of the Celtic Interconnector comprise:

- Subsea electricity cable connecting the landfall location in France and the landfall location in Ireland;
- A landfall location at Claycastle in County Cork where the subsea electricity cable will connect to the underground electricity cable;
- A converter station at Ballyadam in County Cork to convert between DC and AC; and
- Underground electricity cables in Ireland and France connecting (1) the landfall location and the converter station; and (2) the converter station and the grid connection point (existing substations at Knockraha in County Cork and La Martyre in Brittany).

Further detail on the project is available [HERE](#)¹.

If the required consents are granted, we anticipate that the interconnector will go live by 2027.

¹ <http://www.eirgridgroup.com/the-grid/projects/celtic-interconnector/>



Continued...

What is Currently Happening?

The Celtic Interconnector is following EirGrid's six-step approach to planning electricity grid projects. In previous steps EirGrid identified the need for the project, what technologies can meet these needs and what area may be affected.

The project is currently at Step 4 -*Where Exactly Should We Build?* Due to the large-scale and transboundary nature of the Celtic Interconnector, an Environmental Impact Assessment Report (EIAR) is being prepared. The EIAR will be a multi-volume document covering the onshore and offshore components of the Celtic Interconnector throughout its installation and operational lifespan of at least 40 years. The EIAR will present the findings of a robust assessment of the environmental impacts of the Celtic Interconnector on a range of environmental receptors.

On behalf of EirGrid plc, Wood plc has prepared a Scoping Report document that presents the proposed content and approach to the EIAR for the marine environment. This document has been submitted to the Foreshore Unit within the Department of Housing Local Government and Heritage (DHLGH) for information and review and can be made available upon request.

What are the Next Steps?

Wood plc is currently undertaking the environmental assessments that will be reported upon in the EIAR. This will be used to inform a foreshore licence application and a planning application that will be submitted in Spring 2021.

We would welcome your views on the Celtic Interconnector and any input that the Marine Survey Office may have to inform the EIAR for the marine environment. We would be pleased to meet with representatives from your organisation; to introduce ourselves, to provide further information concerning the project, and to hear your views. It is expected that any such meeting would be held remotely via telephone or an internet video call given the ongoing COVID-19 restrictions faced by us all.

It would be appreciated if you could confirm the most suitable person(s) within your organisation to engage with us on these matters.

The email address to respond to is: celticinterconnector@woodplc.com

Yours sincerely,



Jennifer Wilson

Principal Consultant

Wood plc





Celtic Interconnector

Volume 8A

Appendix B: Minutes of consultation call with CCC 23 November 2020

June 2021



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The Oval, 160 Shelbourne Road, Ballsbridge, Dublin D04 FW28
Telephone: 01 677 1700 • www.eirgrid.ie

Minutes of Consultation Call with Cork County Council on Monday 23 November 2020

Meeting commenced at: 3pm & concluded at 4pm

Attendees:

Cork County Council (CCC)	Dave Clark (DC) – Senior Executive Engineer Sean O’Callaghan (SOC)- Senior District Officer Aiden Weir (EW)
EirGrid	Eoghan Tuite – (ET) Offshore Project Manager Valerie Brennan – (VB) Consents Coordinator
Wood	Laura Gatdula – (LG) Project Manager - Marine Consultants Brian O’Keeffe (BOK) - Engineer Colin Carter (CC) – Socio-economic consultant John Mabbitt (JM) – Heritage consultant

Apologies:

None	Paul Murray (CCC) Helen Mulcahy (CCC) Des Cox (EirGrid) Joseph Maloney (EirGrid)
------	---

Overview:

The objective of the call was to update Cork County Council on project including the construction methods and sequencing at Claycastle Beach.

The meeting took place via Teams as arranged by Wood.

Agenda:

1. Introductions
2. Project Overview – project description, importance/benefits, development process/consultation update
3. Overview of consenting process inc. SID from HWM to Knockraha and Foreshore Licence from HWM out to 12nm limit
4. Overview of landfall point – mapping and details of local environment and peat etc.
5. Proposed construction methodology including sequencing and mitigation measures
6. Overview of EIAR & SIA process and scoping currently underway / request for feedback/input from consultees such as CCC
7. Feedback/advice from CCC
8. AOB

Key Meeting Minutes:

1 Introductions

- Brief round of introductions given by all attendees.

2 Project overview and

3 Overview of consenting process

- ET gave an overview of the Celtic Interconnector project, highlighting its national significance.
- Project roadmap was presented, with description of the current “Detailed Design” phase, noting that applications for consents will be submitted in Q1 2021 and works at Claycastle Beach are likely in 2025.
- ET gave an overview of the consultation process, best performing options, landfall construction description, key features of the submarine infrastructure, and noted no requirement for cable protection in Irish waters.

4 Overview of landfall point and

5 Proposed construction methodology

- BOK presented an overview of the proposed construction works at the landfall, noting that the preferred approach is to undertake the work in two phases to minimise disruption at Claycastle Beach.
- The presence of peat at lowest astronomical tide (LAT) was noted. Boreholes have been taken to determine the depth of the peat layer, identifying it at c. 4.5m depth at LAT and 8.3-8.5m depth further offshore. Depth of lowering of cable likely to be c.3m in nearshore, and less than 2m further offshore. Noted that peat depth across the wider Area may vary relative to the borehole data.
- BOK described the installation of a cofferdam to allow beach works to be undertaken throughout the tidal cycle.
- DC queries works in the area between LAT and carpark and how the trench will interface with the peat. DC notes that peat is currently visible at low tide and that sand is eroded by winter storms, further exposing the peat. DC notes concern over the receiving pit where this may cut into the peat and leave a hole, raising potential safety concerns at a bathing beach both for the short and long term.
- BOK notes that the bathymetry would be returned to previous conditions after works completed and that while it is possible to infill back with the peat, it would not provide notable benefit and would likely be infilled with sand.
- ET noted that an archaeological clerk of works would be present
- SOC asked whether Transition Joint Bay (TJB) would be underground and ET confirmed that it would. ET confirmed that there would be no construction of structures over the so this could ultimately be walked over by the public once works complete.
- BOK explained how the plough can be used on the beach. It automatically back-fills, which reduces beach disruption but it would have to occur in summer months to benefit from fairer weather conditions and long daylight hours.
- Overview of construction sequencing noted that the plough can cover 200m/hour. The overall process on the beach would result in a minimum of two weeks of reduced access at the carpark.
- SOC asks whether the carpark works could be done outside the busy summer season. ET explained that decoupling de-risks the schedule from possible delays with the vessel etc. ET suggests bringing forward as assessment of both options for procurement in order to understand the views of contractors on the most appropriate methods.
- SOC asks what the worst-case would likely be in terms of reduced beach access. SOC suggested that closing the beach for the whole month of August for example would be highly problematic, but that works in the spring or early summer may be more manageable. SOC accepted that closing the carpark for a number of days would be workable.
- ET proposed to develop a technical note setting out the worst-case scenarios in terms of scheduling alongside related areas of risk.

6 Overview of EIAR & SIA process and scoping currently underway / request for feedback/input from consultees such as CCC

- Time at the end was very limited for this agenda item. LG provided a rapid and high-level update on progress towards the foreshore consent to date. LG noted that a scoping document had been produced and submitted to the Foreshore Unit for review and comment and that it could be made available to CCC upon request.
- LG noted highlights in the EIAR timeline including EIAR chapter drafting in Q4 2020, EIAR finalisation in Q1 2021, and foreshore licence application submission and draft PCI file submission in Q1 2021.

Feedback/advice from CCC and 8 AOB

- CC asks about beach events and activities. CCC note that IronMan is scheduled for 13-15 August 2021 and that the event is likely to recur in August (whereas it used to occur in June). Beach events can be informed and programmed in advanced to avoid periods required for installation.
- DC asked whether HDD would be an option at this site. BOK explained that HDD vessels need >5m keel depth which at Claycastle is c. 1-2km offshore due to the very gently sloping

bathymetry there. HDD is therefore a low feasibility option. Jack up vessels are also low feasibility at this site. Pull-in vessel for cable installation is the preferred method.

- DC asked whether jetting is a possibility for cable installation in place of open cut trenching. ET explained the difficulties in retaining the correct buoyancy of the cable under this technique at the foreshore and that open cut trenching is the preferred approach at this site.
- AW queried whether the ABP planning department is being consulted, which is indeed the case within the context of the onshore planning application being managed by Mott MacDonald.

Key Actions Arising	Responsible	Status	Due
<ul style="list-style-type: none"> • Project promoters to develop a technical note setting out the worst-case scenarios in terms of scheduling alongside related areas of risk. 	ET	Open	
END			

Appendix A

Celtic Interconnector: Foreshore Licence Consultation with DHPLG Foreshore Unit

The following information is intended to inform discussions between EirGrid and the DHPLG Foreshore Unit during a call scheduled^f for 11am on Thursday 20th August 2020. The information is set out in line with key draft agenda items shared with DHPLG by email on 11th August 2020, which were reconfirmed and set out in more detail via email on 18th August 2020.

1. Schedule – key milestones

Key Milestone	Date
Project update	During call
EIA Screening	For discussion during call
Consent Pack Scoping development	Ongoing (for discussion during the call)
Call (to be requested) with DHPLG regarding NIS	w/c 24 th August
Joint Environmental Report (JER) to be available in English	w/c 21 st September
EIA Scoping proposal	w/c 31 st August 2020
DHPLG response to EIA Scoping proposal	mid-September 2020
EIAR development	September to February 2021
EIAR consultation	November to February 2021
Foreshore Licence Pre-submission engagement with DHPLG	w/c 22 nd February 2021
Foreshore Licence Application submission to DHPLG	April 2021
EIAR consultation by DHPLG (6 weeks assumed)	April-May 2021
Advertise public notice (8 weeks assumed)	May 2021
Foreshore Licence decision (no less than 13 weeks assumed)	June 2021

2. EIA Screening

EirGrid are currently preparing an EIA Screening Report and wish to ensure that the views of relevant stakeholders are duly considered. EirGrid anticipate that the EIA Screening Report will be occur in parallel with separate NIS screening and MCZ assessment. The statutory requirement for these will be confirmed over the next few weeks.

We anticipate that the EIA Screening Report will include the following information:

- Project details including a high-level description of the need for the project and the proposed installation techniques.
- A summary of potential impacts and proposed mitigation.
- A statement concerning the current project status.
- A summary of discussions held with relevant organisations to date.
- Project location (required data format to be discussed).
- Other related consenting requirements (to be discussed with DHPLG whether any other consents are required).
- Promoter contact details.

EirGrid would appreciate the input of the Foreshore Unit on this matter.

3. Scoping of Consents Application Pack (including EIAR)

We intend to discuss our proposed consents application and would appreciate the views of DHPLG on the content and level of detail they would expect to see in the Foreshore Licence Application.

This will include discussion of plans and particulars that the Foreshore Unit will require as part of the Foreshore Licence Application.

In particular, the EIAR will include some introductory sections to set out the objectives of the document, the relevant legislation and planning regime that it has been developed under, and a description of the project including the consideration of alternatives. It will also include the following technical sections:

- Noise and vibration
- Air quality and climate
- Sediments and physical processes
- Water quality
- Biodiversity
- Seascape and landscape
- Archaeology and cultural heritage
- Material assets
- Population and human health
- Shipping and navigation
- Commercial fisheries
- Major accidents and disasters
- Cumulative, in-combination and transboundary effects

Each technical section will include:

- Summary of relevant legislation, regulations and guidance
- Description of data acquisition and survey work undertaken to inform the assessment
- Summary of any consultation undertaken to date and approach to further consultation required
- High-level information concerning the baseline environment and the sensitivity of receptors
- Elements of the project that will interact with sensitive receptors
- Scoping in and out of likely significant effects
- Summary of the approach to assessment and methodologies
- Approach to mitigation and monitoring where relevant

4. Consultation

EirGrid seek the advice of DHPLG regarding the consultation requirement for the Foreshore Licence application. Prescribed and non-Prescribed but potentially relevant consultees are presented below and discussion with DHPLG is invited around the relevance of these, any other consultees that DHPLG would expect to see included, and any other requirements DHPLG may have with regard to the consultation of these organisations.

The views of DHPLG concerning the approach to consultation where stakeholders may have an interest in both the onshore and offshore elements of the project is also invited and their expected approach to the resolution of any issues that may arise before the submission of the Foreshore Licence Application.

EirGrid has been in consultation with Prescribed Consultees in Ireland since 2018. This has included email, telephone and face to face correspondence with the following:

- Environmental Protection Agency (EPA);
- An Bord Pleanála;
- Department of Housing, Planning & Local Government Marine Environment and Foreshore Unit (MEFU);
- Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs;
- National Parks and Wildlife Services (NPWS);
- National Monuments Service Underwater Archaeology Unit (UAU); and
- Department of Culture, Heritage and the Gaeltacht (Development Applications Unit).

As part of ongoing communications around the Celtic Interconnector in East Cork, public consultation webinars were held in August 2020 engaging with members of the community councils, business groups, and interested stakeholders in the community. Details of the consultation undertaken to date in Ireland is provided on EirGrid's project specific website¹.

¹ <http://www.eirgridgroup.com/the-grid/projects/celtic-interconnector/the-project/>

Prescribed Consultees Ireland	Prescribed/Non Prescribed Consultee	Proposed Approach	Key Topics for Discussion
An Chomhairle Ealaíon (Arts Council of Ireland)	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
An Taisce (National Trust for Ireland)	Prescribed	Written correspondence and request for online meeting, potentially with National Monuments Service	Conservation and heritage
Commission for Energy Regulation	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
Cork County Council	Prescribed	Written correspondence and request for online meeting	General request for comments on planning and environment
Department of Housing, Planning and Local Government (Foreshore Unit)	Prescribed	Written correspondence and online meetings	
Department of Transport, Tourism and Sport	Non-Prescribed	Written correspondence and request for online meeting	Navigation (including recreational boating) and beach use
Environmental Protection Agency	Prescribed	Written correspondence and request for online meeting	General request for comments on planning and environment
Fáilte Ireland (Irish Tourism Trade Support)	Prescribed	Written notification. Meeting unlikely to be required unless requested by Department of Transport, Tourism and Sport	General request for comments
Health Service Executive	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
Heritage Council	Prescribed	Written correspondence and request for online meeting	Marine archaeology and heritage
Irish Coast Guard	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Irish Maritime Administration	Non-Prescribed	Written correspondence and request for online meeting	Navigational safety
Irish Sea Fisheries Board	Prescribed	Written correspondence and request for online meeting with South Western Fisheries Board	Commercial fisheries
Marine Safety Policy Division	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Marine Survey Office	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Marine Survey Office Administration	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Maritime Services Division	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Maritime Transport Division	Non-Prescribed	Written notification. Meeting unlikely to be required unless	Navigational safety

		requested by Irish Maritime Administration	
Mercantile Marine Office	Non-Prescribed	Written notification. Meeting unlikely to be required unless requested by Irish Maritime Administration	Navigational safety
Minister for Agriculture and Food	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
Minister for the Housing, Local Government and Heritage	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
Minister for Transport	Prescribed	Written notification. Meeting unlikely to be required	General request for comments
National Monuments Service	Non-Prescribed	Written correspondence and request for online meeting	Marine archaeology and heritage
National Parks and Wildlife Service	Non-Prescribed	Written correspondence and request for online meeting	Marine ecology and NIS
South Western Fisheries Board	Prescribed	Written correspondence and request for online meeting with Irish Sea Fisheries Board	Commercial fisheries
Underwater Archaeology Unit of the National Monuments Service	Non-Prescribed	Written correspondence and request for online meeting	Marine archaeology and heritage

5. Legal matters

Discussion around the legal entity applying for the Foreshore Licence.

6. Next steps arising

- Future meeting dates, etc. (based on the above)

7. AOB

An update on the transitional arrangements for the marine consenting reform/MPDM is invited if available.

On the previous call it was discussed that applications under would be progressed up to Q1 2021 under the current regime and that there would then be a transitional period. EirGrid seeks confirmation from DHPLG whether these approximate dates are still applicable or whether the timeline been solidified at all.



Celtic Interconnector

Volume 8A

Appendix C1: Minutes of consultation call with EPA 23 September 2020

June 2021



The Oval, 160 Shelbourne Road, Ballsbridge, Dublin D04 FW28
Telephone: 01 677 1700 • www.eirgrid.ie



Celtic Interconnector Project

**Minutes of Pre-Application Consultation Call with the Environmental Protection Agency (EPA)
held on Wednesday 23 September 2020**

Meeting commenced at: 3pm & concluded at 3:45pm

Attendees:

EPA	<ul style="list-style-type: none"> • Karen Creed (KC) – EPA Manager across a number of different areas • Ciara Maxwell (CM) – Licensing Inspector with the EPA (focused on Dumping at Sea / DaS)
EirGrid	<ul style="list-style-type: none"> • Eoghan Tuite (ET) – Offshore Project Manager • Valerie Brennan (VB) – Consents Coordinator

Circulation:

EirGrid	<ul style="list-style-type: none"> • Des Cox (DC) – Consents and Planning Team Lead
Wood	<ul style="list-style-type: none"> • Laura Gatlula – Project Manager – Marine & Offshore Lead Consultants • Brian O’Keeffe – Marine Coordinator – Marine & Offshore Lead Consultants • Rachael Mills – Project Director – Marine & Offshore Lead Consultants • Jennifer Wilson – Principal Consultant Marine – Marine & Offshore Lead Consultants

Overview:

Introductions were made at the start of the meeting. The context was explained as this being a pre-application discussion meeting to update the EPA on the project and seek their advice in relation to whether or not a Dumping at Sea (DaS) Permit would be required for the Celtic Interconnector Project. It is to follow on from previous EPA and EirGrid consultation that took place in November 2018 – between Ciara Maxwell from the EPA and Erlend Christiansen and Maeve Flynn (both formerly of EirGrid).

The below Agenda was suggested at the start of the meeting and the meeting followed this format whereby ET presented the associated slide deck and questions were invited towards the end of the presentation.

1. Importance and benefits of the project
2. Project roadmap and funding
3. Project development update
4. Consultation process update
5. Submarine infrastructure & description of relevant activity
6. Dumping at Sea Act & Guidance Note
7. Next steps arising
8. Questions and Answers

Key Meeting Minutes:

1.0 Offshore Installation

- The Celtic Interconnector project cannot be defined as an ‘offshore installation’ as a Ministerial Order is required in order for offshore installations to fall under a Dumping at Sea requirement and the relevant part of the DaS Act associated with this has not yet been enacted – Ref. Section 5(12) of the DaS Act. It will be possibly be enacted at some unknown timeframe in the future.

2.0 Plough Dredging

- KC advised that Plough Dredging is a Licensable activity as it concerns the deliberate disposal of material at sea and anything that is deliberate is a licensable activity that requires a DaS Permit / License.
- While some parts of the UK do not require a DaS Permit for plough dredging, the legislative requirements in Ireland are different to those in the UK.

3.0 Beneficial Uses

- If there is any Disposal of material, you have to think about beneficial re-uses for that material.
- The EPA STRIVE report by Cork Institute of Technology, 'Guidance on the Beneficial Use of Dredge Material in Ireland', includes useful information on the different consents/licences that may apply to different re-use activities:

<https://www.epa.ie/pubs/reports/research/sss/Beneficial%20Use%20of%20Dredging%20Material.pdf>.

4.0 Jurisdiction

- The EPA's jurisdiction around a DaS Permit includes both the Irish Territorial Waters and the Irish EEZ (i.e. all the way out to the 200 nm limit).

5.0 Disposal

- KC advised that the key question that the Celtic Interconnector Project has to ask itself include – are we looking to dispose of any material at sea?
- If you are moving sand e.g. via sand-wave sweeping in the Irish EEZ and this material is not reused, this activity likely requires a DaS Permit.

6.0 EWIC Example

- ET noted that EWIC/Greenlink did not require a DaS Permit. KC indicated that she has no recollection of these particular projects and could not comment in relation to same.

7.0 Key Questions Arising for Celtic Interconnector Project are:

- Are you deliberately disposing of material?
- Are you plough dredging (e.g. using a jetter / a plough)?
- What is sand-wave sweeping?
- Is there a beneficial use to any material that is being moved?
- What works do you need to do in the Irish jurisdiction?

8.0 Technical Note

- ET noted that Wood have prepared a Technical Note in relation to the current understanding of whether a DaS Permit is required for Celtic. KC advised that the EPA does not accept any paperwork / material / technical notes in advance of receiving a DaS application; however, we can ask them to formally reply to certain questions / ask them for informal pre-application advice.
- VB noted that a whole project approach was being taken to EIA and that an EIAR was being prepared at present as part of the consenting pack.
- KC recommended that EirGrid consult further with Wood and the relevant legislation in relation to the proposed works and whether a DaS Permit is required.

Key Actions Arising	Responsible	Status	Due
<ul style="list-style-type: none">• EirGrid to consult with Wood in relation to the feedback received during this pre-application consultation meeting	EirGrid	Open	24/09
<ul style="list-style-type: none">• Wood to re-consult all relevant legislation with respect to the EPA advice received during meeting held on 23/09	Wood	Open	30/09
<ul style="list-style-type: none">• Additional clarification meeting to be sought with KC and CM once we have total clarity on the answer to the key questions arising for Celtic	EirGrid / Wood	Open	02/10



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Appendix C2: Minutes of consultation call with EPA 14 October 2020

June 2021



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Celtic Interconnector Project

**Minutes of Pre-Application Consultation Call with the Environmental Protection Agency (EPA)
held on 14 October 2020**

Meeting commenced at: 10am & concluded at 10:45am

Attendees:

EPA	<ul style="list-style-type: none"> • Karen Creed (KC) – EPA Manager across a number of different areas • Ciara Maxwell (CM) – Licensing Inspector with the EPA (focused on Dumping at Sea / DaS)
Wood	<ul style="list-style-type: none"> • Brian O’Keeffe (BOK) – Marine Coordinator – Marine & Offshore Lead Consultants
EirGrid	<ul style="list-style-type: none"> • Valerie Brennan (VB) – Consents Coordinator

Circulation:

EirGrid	<ul style="list-style-type: none"> • Eoghan Tuite – Offshore Project Manager • Des Cox – Consents Lead • Rory O’Brien – Commercial
Wood	<ul style="list-style-type: none"> • Laura Gatlula – Project Manager – Marine & Offshore Lead Consultants • Rachael Mills – Project Director – Marine & Offshore Lead Consultants • Jennifer Wilson – Principal Consultant Marine – Marine & Offshore Lead Consultants

Overview:

Introductions were made at the start of the meeting. VB explained the purpose of the meeting as this being a follow on from a previous pre-application meeting held on 23 September 2020 where specific queries were raised by the EPA in relation to the technical nature of the proposed cable laying works. The objective of the meeting was described as being to provide the EPA with comprehensive answers to the queries raised and once again seek EPA advice in relation to whether or not a Dumping at Sea (DaS) Permit is required for the Celtic Interconnector Project.

The below Agenda was suggested at the start of the meeting and the meeting followed this format whereby BOK presented the associated slide deck and allowed for questions to be posed and answers to be provided throughout the presentation of the slide deck.

1. Introduction to Wood (Marine and Offshore Consultants)
2. Description of proposed works in Irish Territorial Waters and Irish Exclusive Economic Zone (EEZ)
3. Responses to specific queries raised on 23 September 2020
4. Wood understanding regarding whether Dumping at Sea (DaS) Permit is required for Celtic
5. Questions and Answers

Key Meeting Minutes:

1.0 Introduction to Wood

- BOK advised that Wood is an international and multi-disciplinary team that have been working on the Celtic project since 2017. Brian advised he is based in Galway and that his work on the Celtic project has included looking at possible landfall locations and undertaking a cable burial assessment.

2.0 Description of Proposed Works and key considerations for DaS Permit requirement

- BOK noted that ultimately the cable will be buried 0.5-2m and that over time, spoilt will go back into the trench.
- KC advised that the most important consideration in relation to determining whether a DaS Permit is required is to consider whether there is any **deliberate disposal** of material at sea. More specifically KC stated that **digging a trench and filling in that trench is not deliberate disposal of material at sea and therefore does not require a DaS Permit**. KC noted that if you are not moving the seabed material from side to side and beyond a distance of approximately 1-2 metres and if the material is being reused, it is not deliberate disposal and therefore a DaS Permit is not triggered.
- BOK advised that it is understood based on survey work undertaken by Wood that there are no sand-waves located in Irish Territorial Waters (TW). Hydro sedimentary analysis indicates that sand-waves are not expected in Irish TW or EEZ (Irish waters). If sand-waves were occurring in the Irish waters dredging might be required to move those sand-waves, however, again there are no sand-waves occurring in the Irish waters.
- BOK also confirmed that there is likely to be no boulder clearance required along the proposed subsea cable route within any portion of the Irish TW or the Irish EEZ. The proposed route has been purposefully chosen due to the fact that it avoids all boulders on the seabed. If any boulders have moved since the survey was undertaken, the requirement for a DaS Permit arising can easily be avoided via micro-siting around any such boulders. BOK also confirmed that in all instances it is not proposed to deliberately dispose of any boulders into Irish Waters as part of the cable laying works.
- It was agreed by all that the Celtic Interconnector Project does not constitute “an offshore installation” for the purposes of the Foreshore Act 1933 (as amended).

3.0 Responses to Specific Queries Raised:

The following questions that were posed at meeting held on 23 September 2020 were presented by EirGrid and responses to each of these questions were included in the slides that were presented. In short, the following answers were provided to the EPA:

1. Are you deliberately disposing of material at sea? No
2. Are you plough dredging (e.g. using a jetter / plough)? The use of a jetter can be avoided. A Simultaneous Lay and Burial tool was presented as an example of a non-displacement plough which could be used. When the cable is laid, it is not expected that much of a berm will be created on the seabed as the material will fall in and around the approx. 15cm cables. Cable burial requires displaced sediment to protect the cable by back filling.
3. What is sand-wave sweeping? It is moving significant sand-waves and as previously discussed, no sand-wave sweeping is required / proposed within the Irish Waters.
4. Is there a beneficial use to any material that is being moved? Yes, it will bury the cable and help protect it from being severed.
5. What works do you need to do in the Irish jurisdiction? Please refer to side 4 and 5 of the presentation which explain the proposed cable laying works required to deliver the Celtic Interconnector Project.

4.0 Agreed understanding of DaS

- If hydrodynamic dredging is required, this could trigger a DaS Permit requirement if the proposed works involve any deliberate disposal of material at sea. However, for the Celtic project, there is no deliberate disposal of material at sea proposed.
- The onus is EirGrid has decided that a DaS Permit is not required. Based on the advice received by the EPA on 14 October 2020 in relation to the proposed cable laying works, EirGrid is of the clear understanding that a DaS is not required.
- KC advised that the EPA is happy to take a call from EirGrid in the future at any stage should any further advice be required regarding a DaS Permit requirement.

Key Actions Arising	Responsible	Status	Due
<ul style="list-style-type: none">• EirGrid to prepare a Minute of this meeting and keep it on the file as a record of the DaS Permit understanding.	EirGrid	Closed	12/11
<ul style="list-style-type: none">• Wood will update the Technical Note on file previously prepared to reflect the understanding arising from the meeting of 14/10	Wood	Closed	12/11



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Appendix D: Scoping Response, MSO

June 2021



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In respect of the EIA scoping report the following comments were received from the Marine Survey Office, which may be more relevant to future aspects of the project:

The MSO has no objections from a navigational viewpoint to the above application. However the installation process may have a short-term impact on marine traffic in the vicinity of Youghal Bay.

The applicant is therefore required to carry out the following;

- The applicant is required to arrange the publication of a marine notice through the Irish Maritime Administration. This marine notice should give a general description of operations and approximate dates of commencement and completion.
- Full consultation with Youghal and associated harbour authorities is required in this matter.
- Liaise with the Irish Coast Guard to arrange appropriate the broadcast of appropriate navigation warnings to advise marine traffic approaching the works area.
- Submit to the Marine Survey Office, a list containing the names of all vessels associated with the installation within the territorial seas, including proposed interaction with an Irish Port Facility. The M.S.O. Dublin will then make an assessment regarding the requirements if any in relation to Irish Load Line Certification and possible passenger boat licence requirements.



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Appendix E: Scoping Response, DAFM

June 2021



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Eamonn Foley (Housing)

From: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>
Sent: Friday 12 February 2021 15:59
To: Eamonn Foley (Housing); Housing Foreshore
Cc: Foreshore
Subject: Our Ref: FW.8.89 Eirgrid Celtic Interconnector - EIAR Scoping Report

Our Ref: FW.8.89 Eirgrid Celtic Interconnector - EIAR Scoping Report

Dear Eamonn,

I refer to your request for comments/observations from the Department of Agriculture, Food and the Marine in relation to the above scoping request.

The following points should be included in any report that issues from your Department please.

- The timing of the cable laying to shore- this must be done from March – October only, so that the shrimp fishery is not affected.
- Once the cable is laid and buried fishers must gain access to the ground to resume their activity unhindered.
- No exclusion areas must exist.
- It would be important to identify the extent of fisheries likely to be impacted and to consult and canvass the views of local fishermen.
- Post-consent monitoring should be identified in order to reduce uncertainty identified in the report.
- The effects of Electromagnetic Fields (EMF) on electro-sensitive species. Given the nature of the proposed power transmission (i.e. direct current) and that higher sensitivity has been demonstrated from DC cables, it would be important that the EIAR examined, in depth, the likely effects of the proposed development on a number of possible receptors. These include, shellfish species (crustaceans), elasmobranchs, demersal species and mammals.

Kind Regards,

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

Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceanglái leis, faoi phribhléid agus faoi rún agus le h-aghaidh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.



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Appendix F: Scoping Response, UAU-NMS

June 2021



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A chara,

Attached please find the heritage recommendations of the Department for the above mentioned application.

Underwater Archaeology

The Underwater Archaeology Unit of the National Monuments Service (NMS), Department of Housing, Local Government and Heritage acknowledges that several archaeological impact assessments have been carried out since 2014 to address the underwater cultural heritage, both within Ireland's territorial seas and contiguous zone (to the Meridian line), and on the foreshores of the potential landfall areas (Claycastle Beach, Redbarn Beach and Ballinwilling Beach), all in Co. Cork.

Terrestrial/Onshore landfall works:

This application is the Foreshore Licence application in conjunction with another application submitted that will connect the cable at the chosen landfall location to the national electrical grid.

The National Monuments Service has submitted separate responses for the terrestrial works but both applications should be view together to ensure all required archaeological mitigation dovetails.

Wreck locations (known and potential):

It is noted that known and potential wreck sites will be avoided and agreed exclusion zones (AEZs) will be established around them, which is to be welcomed. An exclusion zone should be proposed that reflects what is known about the identified or potential wreck sites and which, in turn, will need to be agreed with the National Monuments Service. Determination of the extent of the AEZ will depend on the nature and extent of the identified known or potential wreck site ('live' or 'dead' as categorised in the assessment reports); an exclusion zone of between 50m-100m should be put in place, with the actual extent of the AEZ to be agreed with NMS.

Any number of wrecks may lie buried awaiting discovery along the proposed cable routes. Should the development proceed it is likely that cable laying works could negatively impact on previously unrecorded/non-located wrecks. While an exclusion zone will be proposed, the prospect that it may not be possible to avoid a wreck site should also be considered, with mitigation proposed accordingly.

There appears to be confusion between the archaeological assessment report by Headland Archaeology in 2014 and the later amalgamation of all results by Cotswold Archaeology in their Technical Report regarding the identification and assessment of live, dead and unknown wreck sites. Cotswold Archaeology refers to wrecks identified beyond the 12-mile territorial seas of Ireland, between that limit and France. It appears to include those wrecks which are clearly within the territorial waters of Ireland and indeed many that are in the near-shore zone. These include those identified by Headland Archaeology in their report as: HA5, HA6, HA8, HA10, HA13, HA26, HA32, HA34, HA35, HA52, HA57, HA68, HA69, HA70, HA71, HA72, HA87, HA88, HA89, HA90, HA102, HA105 and HA113. While some or indeed all of the wrecks with known locations may be at a sufficient distance to the proposed cable route into both Claycastle and Redbarn to ensure avoidance, further clarification by way of updated details on locations, proximities, potentials, etc. is required to allow for a value judgment to be made on the cable route in that area. More detailed results on the geophysical survey data from the area where these wrecks are located needs to be applied relative to these anomalies/wreck sites, and where known wrecks are located less than 100m from the cable route and within diving limits (i.e. less than 50m), archaeological dive inspection should be considered to inform more fully on wreck site locations, nature and extent.

Potential wreck CA1001 is located in deep water and which is in proximity to the cable route. As it will not be possible to put in place a sufficient AEZ for this, it should be subject to further, more detailed assessment by way of more detailed geophysical survey, ROV survey, etc. Similarly

HA2051, HA 2052 and HA2082 have been identified as potential wreck sites and more detailed assessment will be required on these if an agreed exclusion zone cannot be put in place.

Anomalies:

Several anomalies have been identified offshore, that are classed as having archaeological potential. A sufficient AEZ of 100m should be placed around these to ensure no impact will take place to them during the cable-laying works. Where anomalies are shallow, i.e. in archaeological diving range (less than 50m depth) and where a sufficient AEZ is not possible, the anomalies should be the subject of archaeological diver inspection.

Vibro-cores and other SI works going forward:

It is noted that further SI works are planned in the form of more extensive vibro-cores, etc. along the proposed cable routes. It is also noted that probable Palaeo-Channels were identified which may indicated sea-level change and a pre-historic cultural landscape beneath the waves in those areas. The results of all further cores, bore holes, grab samples, etc. should be subject to detailed archaeological interpretation, including geo-archaeological analysis, with results of this analysis submitted as Further Information to the National Monuments Service.

Archaeological testing:

The identified potential 'metal' pot, located on the foreshore at Claycastle Beach, to be the focus of archaeological testing to determine its nature and extent, as well as its relationship with the surrounding exposed peat, part of which has been preliminarily interpreted as a possible Bronze Age *fulacht fiadh*.

Archaeological monitoring:

Foreshore: All works on the foreshore, for all cable landings to be the subject of archaeological monitoring.

Offshore: A proposal for the archaeological monitoring of the main offshore cable-laying works to be submitted to NMS for consideration and approval. It should accompany a licence application and put forward mitigation for avoidance as well as dealing with archaeology encountered during the cable-laying works.

Up to date mapping:

The National Monuments Service should be provided with up-to-date mapping to indicate all agreed exclusion zones around identified known or potential wrecks, anomalies of cultural potential and areas of archaeological potential (i.e. such as exposed peats), etc.

All archaeological works, including testing, analysis, diving, monitoring, etc. is to be licensed by this Department and a detailed methodology should accompany the relevant licence applications submitted by a suitably qualified and suitably experienced underwater archaeologist(s).

Nature Conservation

The applicant has forwarded a letter and project report seeking the opinions of the Department of Housing, Local Government and Heritage for the electrical interconnector cable landing at Claycastle Beach, Youghal, Co Cork and the passage within the foreshore of Irelands territorial waters. The applicant should note the following in relation to marine nature conservation:

According to Article 6(3) of Council Directive (92/43/EEC) (the Habitats Directive) 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. The provisions of this article have been transposed into the Irish Statute by Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations (SI 477 of 2011). This regulation requires that "a screening for Appropriate Assessment of a plan or

project for which an application for consent is received...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. It is noted from the submitted documentation that the proposed development would be located less than one kilometre from Blackwater River (Cork/Waterford) SAC. There may also be further interaction with other nature sites. In order to fully comply with this legal requirement the proponents should include a Natura Impact Statement screening document with application for consent. If this NIS evaluates that there is not likely to be a significant impact on adjacent European Sites or their constituent qualifying interests or avian species of conservation concern this must be shown in a Concluding Statement.

It must be noted that all cetaceans are listed under Annex IV (including those in Annex II) of Council Directive 92/43/EEC (the Habitats Directive). Accordingly, under Article 12 of that Directive, it is an offence to deliberately capture, disturb or kill a cetacean or take actions that result in deterioration or destruction of their breeding sites or resting places. This has been transposed into Irish Law by Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations. Introduction of certain sound sources into the marine environment, as may result from construction (e.g. trenching, dredging etc.) over the foreshore, have the potential to cause injury and possibly mortality in these species. All marine mammals are protected wild animals under the Fifth Schedule, which includes all cetacean and seal species, of the Wildlife Act (39 of 1976) and Amendments. Under Section 23 (as amended in 2000), it is an offence to kill, injure or wilfully interfere with or destroy the breeding place or resting place of any protected wild animal.

In addition to the statement related to the European Sites the proponent should also evaluate whether the works would have a potential to interact with marine mammals. The presentation of data related to marine mammal species must be of sufficient resolution to predict the likely interaction with these species over both a spatial and temporal scale. Records of survey should include the months when sampling occurred and the numbers of animals encountered in the vicinity of the proposed development. Some of this detail has been included in the letter already submitted. The assessment should contain sufficient detail including *inter alia*

1. Noise characteristics at source (*i.e.* sound pressure levels, sound exposure levels, frequency, bandwidth, duration of exposures) and information concerning propagation in air/water if applicable.
2. The identification, where appropriate, of measures required to mitigate such impacts. This Department has a current document https://www.npws.ie/sites/default/files/general/Underwater%20sound%20guidance_Jan%202014.pdf in relation to the interaction of man-made noise and mammals in the marine environment. The proposed development may be close in the sound sources being emitted to dredging and the mitigation indicated in this document may be useful in formulating appropriate measures to limit potential interactions with seals or cetaceans.
3. It is recommended that a suitably qualified marine mammal ecologist should be involved in undertaking relevant assessments.

Mise le meas,

Connor Rooney
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
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