

ESB

Green Atlantic @ Moneypoint

AA Conclusion Statement

Reference: ARP-NISCS-I01

01 | 21 November 2025



© Microsoft

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 298122-00

Ove Arup & Partners Limited

Bedford House
3rd Floor
16-22 Bedford Street
Belfast BT2 7FD
United Kingdom

arup.com

Contents

1.	Introduction	A-1
1.1	Overview	A-1
1.2	Legislative Background	A-1
2.	Appropriate Assessment Screening	A-2
3.	Natura Impact Statement	A-2
3.1	Public Consultation	A-2
4.	Mitigation	A-3
5.	Conclusion	A-3

1. Introduction

1.1 Overview

The Electricity Supply Board (ESB) has prepared a Green Atlantic @ Moneypoint Concept (hereafter referred to as the Concept) at Moneypoint, Co. Clare to transform the existing Moneypoint site in County Clare from a coal-fired power station into a renewable energy hub and a strategic resource for the offshore renewable energy sector.

This transformation will be delivered through a series of projects aligned with four strategic objectives: supporting economic development in the Shannon Estuary region; transitioning to a lower carbon operating profile; developing Moneypoint as a base for offshore renewable energy; and supporting Ireland's ambition to become a net exporter of zero carbon energy.

The Concept identifies nine land-use zones and associated principles guiding development, with in-design mitigation measures to address constraints relating to biodiversity, ecology, and cultural heritage. All proposals will be subject to full environmental assessment and compliance with relevant planning and environmental consents, including the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

Delivery will occur over a ten to fifteen year period, with key phases including cessation of coal generation in 2025, conversion to Heavy Fuel Oil as an interim measure until 2029, site remediation, development of energy storage, port upgrades, and the establishment of the Moneypoint Hub to support offshore wind deployment. Longer-term plans include zero carbon fuel production, storage, and dispatchable generation, alongside offshore renewable projects off the west coast. All future development will be assessed for potential likely significant effects on European sites, and mitigation will be implemented where required to ensure compliance with conservation objectives.

1.2 Legislative Background

Article 6(3) of the Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter referred to as the Habitats Directive) sets out the requirement for Appropriate Assessment (AA).

The Habitats Directive has been transposed into Irish domestic legislation through the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) as amended. An AA is an assessment that determines the precise nature and extent of the potential impacts of the plan or programme and whether, alone, or in combination with other plans or programmes, the plan or programme will have adverse effects on the integrity of any European site which can be described as the coherent sum of the site's ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of a species for which the site is designated.

In accordance with these EU and national legislative requirements for the assessment of the effects of plans and projects on European Sites, a Screening for AA and a Natura Impact Statement (NIS) for the ESB's Green Atlantic @ Moneypoint Concept has been prepared by Arup (Ove Arup & Partners Ltd.) on the direction of the ESB.

This document is an AA Conclusion Statement for the Concept. It should be read in conjunction with the following documentation:

- Green Atlantic @ Moneypoint Concept¹;
- Post-Consultation Natura Impact Statement².

¹ ESB (2025) Green Atlantic @ Moneypoint Concept

² The Post Consultation Natura Impact Statement is a combined AA Screening and NIS.

The purpose of the AA process is to inform ESB of the potential for likely significant effects and subsequently any potential for adverse impacts on the integrity of European sites arising from the Concept followed by the recommendations of mitigation, where required, to avoid any adverse effects.

2. Appropriate Assessment Screening

An AA screening exercise of the Concept was carried out to identify whether or not elements of the Concept had the potential to result in likely significant effects to European Sites. This AA screening concluded that the potential for likely significant effects on European sites existed, and so the requirement for an AA was concluded.

A review of the elements of the Concept, through its Objectives and Principles Guiding Development with QIs of SACs (Annex I habitats and Annex II species) and SCIs of SPAs within the Zone of Influence (ZoI) was carried out.

The AA Screening found that the Concept could result in likely significant effects on protected sites. These include the risk of direct and indirect habitat loss, accidental pollution events, disturbance from construction and operation (including noise and vibration), and the potential spread of invasive species. The main features at risk are the habitats and species for which the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA are designated, such as estuaries, reefs, otter, bottlenose dolphin, lamprey, salmon, and wetland and waterbird species. The assessment also considered the possibility of effects on more distant sites through large-scale pollution events or underwater noise

It was concluded that the Concept had the potential, either alone or in combination with other plans or projects, to result in likely significant effects on European Sites (in view of their conservation objectives), and therefore a Stage 2 AA including a Pre-Consultation NIS report was required.

3. Natura Impact Statement

A Pre-Consultation NIS was prepared by Arup on the Concept prior to consultation. This considered the potential for the Concept to adversely affect any European site with regard to its QIs/SCIs, associated conservation status, structure/function of the site and overall site integrity.

The Pre-Consultation NIS of the Concept concluded that, subject to the mitigation proposed being incorporated into the Concept, there would be no adverse effects on the integrity of any European Sites as a result of implementation of the Concept.

The Concept, the pre-Consultation NIS and the SEA Environmental Report were subject to public consultation in June 2025 for a period of six weeks.

3.1 Public Consultation

Submissions received during the public consultation phase were reviewed and where applicable, minor amendments were made to the text of the GA Concept. These changes consisted of minor amendments to the body of text. No changes were made in relation to the objectives or principles guiding development.

The NIS was updated to account for the public consultation process and for the submissions received. Responses to the submissions were provided and are appended to the NIS.

Refer to Appendix A for a summary of Consultation Responses.

4. Mitigation

A comprehensive set of mitigation measures is built into the Concept and further recommended in the NIS. A number of the overarching policies of the Concept emphasise the protection of the natural environment. This includes

- **OP 1:** “The Green Atlantic @ Moneypoint Concept will be implemented having due regard for the sensitivity of the local environment, including the adjoining coastline, which includes the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.”
- **OP 2:** “As required under prevailing legislation, development proposals will be required to comply with the requirements of the Environmental Impact Assessment and Habitats Directives”
- **OP 3:** “Mitigation measures identified by project specific environmental assessment and approved as part of the statutory consenting process, will be implemented to mitigate against impacts arising on the local environment.”
- **OP 10:** “Where appropriate, development proposals will be subject of design level modelling to determine any potential hydrological change that may arise and impact on the hydrology of sites within the zone of influence of the site, including European Sites designated for their international nature conservation importance. Such models will inform mitigation strategies and ensure that site infrastructure is appropriately designed.”

Throughout the Concept, the importance of the Lower Shannon SAC and the River Shannon and River Fergus Estuaries SPA is identified under each of the Land Use Zones (please refer to Table 6 of the Post-Consultation NIS report). These measures include considering the potential impacts towards the QIs and SCIs of the designated sites at project-level. The Concept is a high-level strategic plan and does not contain the detailed design information that would typically be available at project level. As such, it is not appropriate to specify detailed mitigation measures at this stage. Instead, it is recommended that each individual project arising from the Concept is subject to Screening for AA and, where necessary, a Natura Impact Statement. Appropriate mitigation measures should then be identified and applied at the project stage, based on the specific details and potential impacts of each development.

All development proposals must demonstrate that they will not negatively affect the conservation objectives of the nearby protected sites. It is recommended that all project level developments will be subject to detailed environmental assessment, including AA, with avoidance and minimisation of impacts as a priority. Timing restrictions will be applied to avoid sensitive periods for key species. Best practice will be followed for pollution prevention, oil spill contingency, and invasive species management. Specific measures for underwater noise will be implemented, including adherence to national guidance and noise and vibration assessments. There will be ongoing engagement with statutory bodies at project level. If any future project within the Coastal Infrastructure Zone results in permanent loss of protected habitats, further assessment will be required, including demonstration of alternatives, reasons of overriding public interest, and provision of compensatory habitat. For the full list of mitigation measures recommended for each QI and SCI of the Lower Shannon SAC and the River Shannon and River Fergus Estuaries SPA, please refer to Section 6 of the Post-Consultation IR.

5. Conclusion

Following submissions from the public consultation process, the Concept and associated environmental reports were reviewed and amended where appropriate. The consolidated documents were then reviewed by the ESB. Having considered the Concept and the conclusions of the NIS, it can be concluded, for the purposes of Article 6(3) of the Habitats Directive that the adoption of the Concept would not adversely affect the integrity of a European site (whether individually or in combination with other plans or projects).

Appendix A

Consultation Responses

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
DAERA	<p>Natural Environment Division Comments:</p> <p>NIEA Natural Environment Division works to ensure that Northern Ireland’s special natural environment, including its flora and fauna and landscapes, is conserved, enhanced and managed for the benefit of this and future generations, thereby contributing to sustainable development.</p> <p>NED notes the significant distance between the location of the site in which the strategy covers at Moneypoint Co. Clare and Northern Ireland. NED also notes comments made with Section 5.10 that “No Direct transboundary environmental effects are anticipated as a result of the implementation of the draft GA Concept” and that there is the potential for indirect positive transboundary effects. NED is content on this basis. NED also notes the comments made in response to the DAERA scoping response within Section A.3 and is content on this basis.</p> <p>Natura Impact Statement (NIS)</p> <p>NED has reviewed the NIS report and is content with the findings of said report. NED notes that potential impacts have been mitigated as outlined within section 6 of the report. NED advises that DAERA should be reconsulted if there are any changes which result in impacts on Northern Irish sites.</p>	SEA Team AA Team	<p>Noted, no changes necessary to Strategy or AA.</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>
	<p>Marine and Fisheries Division Comments:</p> <ul style="list-style-type: none"> • We welcome wave and elevation methodologies and modelling applied in the Strategic Flood Risk Assessment (SFRA), which can inform coastal resilience assessments and Coastal infrastructure planning in NI. • We welcome the environmental integration of biodiversity, climate, and heritage applied in the SEA and Natura Impact Statement (NIS) • To note that proposed mitigation measures and strategies for crossborder/mobile species (e.g., cetaceans) (e.g., Noise and habitat disturbance mitigation measures, NPWS guidelines, acoustic thresholds) are directly relevant and applicable to NI, particularly offshore renewable energy sector and port developments. Equally, cumulative impacts across Irish Sea and Atlantic zones should be considered. • Functional linkage assessments for migratory species and marine mammals offer a model for NI’s HRA processes. • We welcome the consideration for transboundary effects in the SEA. • We welcome the Environmental Sensitivity Mapping included in the SEA. This is a valuable tool for NI’s coastal zone management. 	SFRA Team SEA Team AA Team	<p>Noted, no changes necessary to Strategy or AA.</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
EPA	<p>Compliance with Industrial Emissions Licence conditions</p> <p>We acknowledge that the ESB, through the Strategy, intends for Moneypoint to continue playing a key strategic role in supporting Ireland’s transition to a low carbon economy and society. In developing and implementing the Strategy, the ESB must ensure that the conditions set down in the Industrial Emissions licence (PO605-04), and the associated Closure Restoration and Aftercare Management Plan are adhered to.</p> <p>Regarding licencing considerations, the EPA invites the ESB to consult early on any new activities that might require an EPA licence prior to operation commencing. Pre-application meetings are encouraged and can be arranged. 2 EPA recommends that SEA-related monitoring and monitoring associated with the EPALicence are separated out into distinct subsections, rather than compiling in one table in the SEA. This will help distinguish the different monitoring requirements of both Strategy and the licence.</p>	ESB	N/A
	<p>Integration of environmental considerations</p> <p>We welcome the extent to which the environmental assessments (SEA, AA and SFRA) have been integrated into and informed the Strategy. This reflects a good example of application of good SEA practice. We also acknowledge that the Strategy includes ‘Overarching Principles’ which have a strong environmental component to be considered for individual projects arising out of the Strategy. These principles have also been informed by the SEA recommendations and the other environmental assessments.</p> <p>The Strategy comprises specific zones (marine energy zone, coastal infrastructure zone, industrial energy zone, ash management zone, general development zone, buffer zone, transmission asset zone, screening zone, and a woodland zone) for development. The Strategy describes the environmental considerations and sensitivity of the surrounding area and incorporates the recommended mitigation measures from the SEA and other environmental assessment processes as appendices. By integrating the SEA ER findings and recommendations into the Plan, this maximises the potential for overall positive environmental outcomes. We acknowledge the inclusion of the SEA mitigation measures in the Plan in the appendices.</p>	SFRA Team SEA Team AA Team	<p>Noted, no changes necessary to Strategy or AA.</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>
	<p>Monitoring</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and address the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. If monitoring identifies adverse impacts during the implementation of the Strategy, the ESB should ensure that suitable and effective remedial action is taken. We acknowledge the reference to the EPA’s Guidance on SEA Statements and Monitoring (2023), which has informed the SEA monitoring programme. This guidance should be a useful resource in implementing the monitoring programme over its lifetime.</p>	SEA Team	<p>N/A for AA.</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>Appendix I – Comments on the Plan</p> <p>We acknowledge that that Strategy is expected to be fully implemented over a 15-to-20- year timeframe. We also note that development of the Strategy will be on a phased basis and subject to a series of planning and environmental consents. Developing the Strategy on a phased basis will help ensure that an evolving environmental baseline, and ongoing environmental monitoring can be considered over the lifetime of the Strategy.</p> <p>Regarding ‘the Moneypoint Hub project’, the Strategy acknowledges that ‘limited wet storage of units’ (referring to renewable energy infrastructure) would be facilitated close to the port, but a dedicated wet storage facility would not be accommodated within the Strategy area. It would be useful to clarify which competent authority would be responsible for developing this element. The siting and location of this facility would need to consider its own environmental assessment and planning processes. The potential for cumulative effects (both terrestrial and marine) arising from development and operation of this facility should also be taken into account.</p>	ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>Appendix II – Comments on the SEA</p> <p>The SEA Regulations set out the information to be contained in an Environmental Report. We acknowledge, in Section 8.3 Principal Environmental Effects, that drafts of the SEA have informed preparing the Strategy from the outset. This shows that good SEA practice has been applied early-on. We welcome that a list of ‘Overarching Principles’ (arising from the SEA, AA and SFRA assessment processes) was developed and incorporated into the Strategy.</p> <p><i>Climate Change considerations</i></p> <p>In Section 5.6.3 Climate, we suggest reference could be made to Ireland’s Climate Change Assessment and the National Climate Change Risk Assessment reports. These would be important resources relating to climate change baseline, mitigation, adaptation, resilience, and risk assessment.</p> <p><i>Landscape Considerations</i></p> <p>The Strategy could consider the EPA’s Good practice guidance on SEA and landscape (EPA, 2023). Additionally, the EPA Research Project, Research Report 461: Reframe Landscape Character Assessment looked at informing how landscape character assessments are carried out. A toolkit was developed to assist practitioners carry out landscape character assessments, which may also to inform developing the elements of the Strategy.</p> <p><i>Radon considerations</i></p> <p>It would be useful to consider relevant available radon mapping information in the development of the Strategy over its lifetime.</p> <p><i>Monitoring</i></p> <p>The monitoring for the SEA is set out in Table 9.3 –Proposed monitoring measures for the draft GA Concept is noted. The specific type of monitoring information used to inform the Draft SEA indicators should be clarified in the monitoring programme, once established. For example, in monitoring Strategy-related climatic factors, it may be useful if monitoring carbon intensity of the energy produced, or levels of the contribution of Moneypoint to the national energy mix were included. Additionally, we suggest that there is merit in reviewing the National Climate Action Plan to identify any relevant aspects or relevance to inform SEA-monitoring. Similarly, reviewing the relevant National Planning Framework National Policy Objectives, may also help inform the monitoring programme. We welcome the reference to the SEA guidance on SEA Statements and Monitoring (EPA, 2020); however, the 2023 version of this guidance should be referred to. It is available at: https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</p>	SEA Team ESB	<p>N/A for AA.</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	Future Amendments to the Strategy You should screen any future amendments to the Strategy for potential for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Strategy.	SFRA Team SEA Team AA Team	AA Team Comment: Official response: This submission is noted. Where there are proposed alterations to the Strategy, where these are material in nature, these alone, would be required to undergo Screening for AA.
	SEA Statement – “Information on the Decision” Once the Strategy is adopted, you should prepare an SEA Statement that summarises: <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Strategy; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Strategy; • The reasons for choosing the Strategy adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Strategy. You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process. Guidance on preparing SEA Statements is available at https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/guidance-on-sea-statements-and-monitoring.ph	SEA Team	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	Environmental Authorities Under the SEA Regulations, you should consult with: <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Climate, Energy and the Environment; and, • Minister for Agriculture, Food, and the Marine 	SEA Team	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
Aisling Horgan	The report is very focused on Moneypoint but what about the impact of the development on local farmers and the neighbouring towns and villages? This development needs to work with the local community, develop long term sustainable jobs via retraining and promote sustainable energy use by encouraging locals to install solar etc in their homes. This report is very singular and all about ESB but without people and accommodation and supporting infrastructure it won't work. Also there is no mention of any existing local companies, community groups that can be liaised with. For example the Irish Whale and Dolphin Association. Without local support there will be objections which will cause delays to this much needed development.	ESB	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
DAFM	<p>It is essential that the sea-fishing and aquaculture sectors are fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as the proposed development of the Green Atlantic @ Moneypoint Concept 2025 is being evaluated.</p> <p>Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The importance of these primary and secondary food production activities are reflected in the Government's Food Vision 2030 policy.</p>	SEA Team ESB	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	<p>To inform the DAFM comments, the observations of the Marine Institute (MI), Bord Iascaigh Mhara (BIM) and the Marine Engineering Division (MED) on the application were requested.</p> <p>The MI observed that the proposal for Moneypoint does not mention or consider marine fishing or aquaculture activities in the Shannon estuary close to the project site but acknowledge that operational information on Inshore fishing at this resolution is not always available and landings from this area cannot be quantified.</p> <p>MI advise there are pot fishing activities on the southern shore of the estuary, crustacean trap fisheries and aquaculture licence sites that are in proximity to the project area.</p>		N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	<p>The MI highlights the proximity of the site to the nearby estuary in the draft Green Atlantic @ Moneypoint Concept: "The adjacent surface water body, the Lower Shannon Estuary is considered to be the sensitive receptor in the event of an unconfined or uncontrolled loss of a contaminant or hazardous material at Moneypoint. The site is adjacent to the Lower River Shannon SAC (Code 002165) and River Shannon and Fergus Estuary SPA (Code 004077) at this location."</p> <p>MED also noted that the documentation does not provide any detail of marine fishing or aquaculture activities within the Shannon estuary and draw attention to number of licenced aquaculture sites for oysters and mussels.</p> <p>These aquaculture sites lie within the Designated Shellfish Waters of West Shannon Ballylongford on the south shore of the Shannon Estuary to the southwest of Moneypoint.</p> <p>The Oyster Fishery Order T08-004B for European Flat Oyster is located to the west of the Moneypoint, and a small section directly overlaps the pier structures at Moneypoint.</p> <p>Information on the location of aquaculture sites in the area are available on the Public Aquaculture Viewer by way of the following link: https://dafm-maps.marine.ie/aquaculture-viewer/.</p>	SEA Team ESB	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>MED note the Moneypoint facility has been operational for many years with no reported impacts on aquaculture in the Shannon Estuary and recommend that any proposals for development in the area includes an assessment on impacts on aquaculture in Shannon Estuary adjacent to the facility.</p> <p>The evaluation of potential impacts of the ‘Green Atlantic @ Moneypoint’ concept on commercial sea fishing activities needs to be given consideration within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework. (NMPF). The principles in the NMPF of avoiding, minimising, or mitigating impacts on access to existing activities (including specific policies on Fisheries and Aquaculture) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas.</p>	SEA Team ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>
	<p>DAFM would seek confirmation that where there are any indirect impacts on traditional fishing grounds identified, consultation with local stakeholders will be undertaken prior to and throughout the works and a Fisheries Liaison Officer (FLO) will be appointed to liaise with all the relevant sea going and foreshore users in advance of any marine survey operations.</p>	ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
Marine Institute (MI)	<p>Summary</p> <p>The “Green Atlantic @ Moneypoint Concept 2025” is a plan intended to repurpose the Moneypoint generating station site in County Clare into a renewable energy hub and strategic resource for the Offshore Renewable Energy (ORE) sector, while maintaining and operating the site as a station. This review considers elements pertinent to fisheries and aquaculture.</p> <p>The plan recognises that: “The adjacent surface water body, the Lower Shannon Estuary is considered to be the sensitive receptor in the event of an unconfined or uncontrolled loss of a contaminant or hazardous material at Moneypoint. The site is adjacent to the Lower River Shannon SAC (Code 002165) and River Shannon and Fergus Estuary SPA (Code 004077) at this location.”</p> <ul style="list-style-type: none"> • Commercial potting fisheries have been recorded operating in close proximity to the site (map below). • Aquaculture licenses are coincidentally with the sites shoreline and in close proximity (map below). • Normal operations of the Moneypoint facility or those envisaged in the future, are not expected to adversely impact these fishing and aquaculture activities. <p>Neither fishing or aquaculture activities are considered or reviewed in the currently available documentation.</p>	SEA Team ESB	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	<p>Background Request:</p> <p>The Marine Climate Unit has become aware of the below request for observations in relation to the Green Atlantic @ Moneypoint Concept 2025 plan. The consultation documents can be accessed via this link: Generation and Trading We would be very grateful for any observations you may have, Nil or otherwise by Friday the 8th of August to allow us to collate responses and have cleared. Please make use of the voting buttons in this email if convenient.</p>	N/A	N/A Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>Observations</p> <p>Documents available presently include:</p> <ul style="list-style-type: none"> - Concept Document - Draft for Public Consultation, July 2025 - Natura Impact Statement, 30 June 2025 - Strategic Environmental Assessment (SEA) Environmental Report, 30 June 2025 - Strategic Flood Risk Assessment, 30 June 2025 <p>These documents do not mention or consider marine fishing or aquaculture activities in the Shannon estuary close to the Moneypoint site.</p> <p>Pot fishing activities have been mapped close by, on the southern shore of the estuary from Moneypoint, fishing for shrimp and potentially other species.</p> <p>While noting that the geographic files indicated below are in the order of 10 years old, Crustacean trap fisheries are still active in the estuary. Operational information on Inshore fishing at this resolution is not always available and we cannot quantify landings local landings from this area or therefore quantify effects.</p> <p>Aquaculture licence sites adjoin the Moneypoint site for European flat oysters while other licenced aquaculture sites are in close proximity.</p> <p>A fishery order (legacy legislation from 1959 Fisheries Act) for production of oysters occurs in the area with two large fishery orders in the bay for flat oysters, a mussel farm across the bay and a few pacific oysters farms in the area.</p> <p>Ireland's Marine Atlas (https://atlas.marine.ie)</p>	SEA Team ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

DHLGH	<p>Archaeology</p> <p>The Department welcomes the opportunity to comment on the Draft Green Atlantic @ Moneypoint Concept 2025 and the supporting SEA Environmental Report. The Department advises that you have regard to the following in finalising both documents.</p> <p>While accepting that the Moneypoint site is largely a brownfield site, the Department advises that the characterisation of the Cultural Heritage baseline of the ESB lands, as summarised at Section 2.5.7, is somewhat understated. The extent of the lands in ownership—as defined in Figure 4—includes the location of a Recorded Monument, CL067-035---- (Earthwork) and the fields immediately bordering the ESB lands include a number of other Recorded Monuments. All of these Recorded Monuments, both within and outside the ESB lands, are subject to statutory protection in the Record of Monuments and Places, established under Section 12 of the National Monuments Act 1930–2014. These sites may be vulnerable to both direct and indirect impacts (including impacts to setting and amenity) from any proposed developments within the ESB lands. Further, the ESB lands include a substantial section of foreshore, with the potential presence of underwater cultural heritage sites, which may also be vulnerable to both direct and indirect impacts from any proposed development.</p> <p>In this regard, the Department is concerned that the list of overarching principles (OPs) at Section 3.4.1 does not make an explicit commitment to ensure the protection of archaeological and cultural heritage (both terrestrial and underwater) and to avoid significant adverse effects, both direct and indirect. While the Department notes that the principles guiding development at Section 3.5 do contain commitments to carry out archaeological impact assessments and underwater archaeological impact assessments, these are too narrowly focused on particular zones only.</p> <p>The Department advises there should be an additional OP committing to the protection of archaeological and cultural heritage (both terrestrial and underwater) and the carrying out of advance Cultural Heritage Impact Assessments, including appropriate underwater and terrestrial archaeological impact assessments in advance of any and all developments.</p> <p>Further, this OP should commit to carrying out any development projects in alignment with the existing Code of Practice between the Department of the Environment, Heritage and Local Government and ESB Networks (2009), or any future revisions to that Code of Practice (see also: https://www.archaeology.ie/advice-and-support/planning-and-guidance/codes-ofpractice/).</p> <p>The Department notes that the Strategic Environmental Assessment (SEA) Environmental Report sets out that adherence to the Code of Practice will be a key mechanism for achieving the avoidance of significant adverse effects to archaeology and cultural heritage (see page 59).</p>	ESB SEA team	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>
-------	--	-----------------	---

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	Therefore, to ensure this outcome, this commitment must also be included within the Concept 2025 draft.		

	<p>These observations are intended to assist in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal.</p> <p>The Draft Green Atlantic (GA) Concept aims to transition Moneypoint from a coal-fired energy generation plant to renewable energy, with the draft principles guiding development, identifying elements of particular construction activities. These include the construction of infrastructure, structure replacement, Offshore Renewable Energy related infrastructure, the development and enhancement of coastal infrastructure and changes in land use. A number of objectives and principles within the draft GA Concept relating to the development of the Coastal Infrastructure Zone are likely to give rise to the loss of areas of estuarine habitat located adjacent to and within the Lower River Shannon Special Area of Conservation (SAC) and the River Shannon and River Fergus Estuaries Special Protection Area (SPA).</p> <p>The Natura Impact Report outlines that direct land-take within the Lower River Shannon SAC boundary may arise as a result of the proposed principles for the development of the Coastal Infrastructure Zone. The Annex I habitats ‘perennial vegetation of stony banks’ and ‘reefs and estuaries’ are recorded in this area. The Conservation Objectives (COs) for the Annex I habitat of ‘perennial vegetation of stony banks’ stipulate that the area of this habitat should remain stable or exhibit an increasing trend. Furthermore, the distribution of this habitat should not undergo any decline or alteration. The physical structure, along with the structure and composition of the vegetation, should be preserved. Similarly, for ‘reefs and estuaries’, habitat area and community distribution should not decline and in particular for reefs, its habitat distribution should remain stable. Owing to the potential for construction in the zones adjacent to these habitats, indirect and direct loss of Annex I Qualifying Interests habitat cannot be ruled out. Such effects would be considered likely to represent an adverse effect upon the integrity of the site.</p> <p>Similarly for the River Fergus Estuaries SPA, loss of areas of estuarine habitat within the SPA boundary is likely to comprise wetlands, inclusive of the Special Conservation Interest ‘wetlands and waterbirds’. The loss of these areas of habitat may represent an adverse effect upon the integrity of the site.</p> <p>The Department acknowledges that, given the nature of the high-level plan document, identification of project specific mitigation measures is not always possible, given the lack of detail on the extent and nature of development. However, the Department is satisfied with the commitment that suitable mitigation measures will be developed at the project level stage to avoid or reduce potential adverse effects on the COs of the habitats/species once the details of the type of development and the level of construction works and impacts are known. More importantly, where mitigation is not possible, for example in the case of habitat loss effects arising from development of the Coastal Infrastructure Zone, there may be a requirement for</p>		<p>The Draft Green Atlantic at Moneypoint is a high-level strategic document that outlines potential future plans for Moneypoint. While the Strategy identifies areas for possible development, it does not provide detailed project-level information regarding the nature, scale, or location of specific works.</p> <p>It is acknowledged that potential impacts on European sites, including the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, and associated Annex I habitats and Special Conservation Interests, may arise from future development. However, given the absence of detailed construction and operation related information, it is not appropriate at this high level stage to identify or recommend specific mitigation measures within the context of this Strategy.</p> <p>Upon assessment at a project-level basis, appropriate mitigation measures will be developed at the project level once detailed design and construction methodologies are known. Where adverse effects on site integrity cannot be avoided, consideration under Article 6(4) of the Habitats Directive may be required, and continued engagement with the Department will be essential to navigate this process.</p> <p>In summary, the Strategy serves as a framework for future development rather than a project-level plan. While potential risks to European sites are acknowledged, further assessment and mitigation will be addressed at subsequent stages when sufficient detail becomes available. No modifications to the NIR are considered necessary.</p>
--	---	--	---

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>the project to be considered in respect of Article 6(4) of the Habitats Directive. In this event, the Department will be available for extensive consultation to navigate this process.</p> <p>Competent national authorities are to authorise activity only if they have made certain that it will not adversely affect the integrity of a European site and consequently, not be likely to give rise to deterioration or significant disturbances within the meaning of Article 6(2).</p>		
	<p>The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/authorities, in his/her role as statutory consultee under the Planning and Development Act, 2000, as amended.</p> <p>You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie, or to the following address: The Manager Development Applications Unit (DAU) Government Offices Newtown Road Wexford Y35 AP90</p>	N/A	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
Clare County Council	<p>On behalf of Clare County Council, I welcome this opportunity to input into the development of the ambitious plans for Green Atlantic @ Moneypoint in line with the company's "Net Zero by 2040" strategy together with the Governments commitments in the Climate Action Plan 2025 to transition to climate neutrality. As a Local Authority we fully support this ambition and the importance of transitioning our electricity supply to achieve a carbon neutral economy by 2050.</p> <p>Clare County Council welcomes the preparation of this Draft Concept Document which clearly sets out and defines the five core elements of the Green Atlantic @ Moneypoint Concept together with the associated Overarching Principles which will be applied to each. The Planning Department of Clare County Council acknowledges the national strategic importance of Moneypoint to energy security and supply together with its very significant importance to our county in terms of Economic Development.</p>	ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p>Further to your presentation on the 30th of July 2025 it is important to highlight the Planning context within which the individual Green Atlantic projects sit and the overarching policies and objectives which should be outlined in the Concept document. While we note some of this is outlined in the SEA Environmental Report it is important that the policy document highlights the key planning policies and context which provide the support and technical guidance for the development of this site within the planning hierarchy both from a terrestrial and maritime perspective.</p> <p><u>Regional Spatial and Economic Strategy for the Southern Region</u></p> <ul style="list-style-type: none"> • <i>Promoting the conversion of Moneypoint electricity station by 2025 from burning fossil fuels. The RSES recognises the importance of Moneypoint as producer of 25% of national energy and its potential as a deep-water port;</i> • <i>There is significant opportunities to grow the Blue Economy through offshore wave and wind renewable energy in the Shannon Estuary and the west coast of County Clare, reflecting the key natural assets of wave and wind energy, together with the presence of grid connections</i> <p>Regional Policy Objective 79 (a) <i>The RSES recognises the national and international importance of the Shannon Estuary, its potential to attract multinational development and the significant work that has been undertaken to progress its promotion and development. It is an objective to support and promote the delivery of the Strategic Development Locations as set out in the SIFP for the Shannon Estuary subject to the implementation of mitigation measures outlined in the SEA and AA undertaken on SIFP and zoned in the Local Authority Development Plans.</i></p>	ESB	<p>N/A</p> <p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

	<p><u>Clare County Development Plan 2023-2029</u></p> <p>The Clare County Development Plan 2023-2029, which was prepared in accordance with the requirements of the Planning and Development Act, 2000 (as amended), the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended 2011) and Article 6(3) of the Habitats Directive, sets out an overall strategy for the proper planning and sustainable development of the functional area of Clare County Council.</p> <p>The Plan takes into account the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Region (RSES), planning guidelines, strategies and policy documents together with the key objectives arising from the Marine Strategy Framework Directive. In the preparation of the final Concept Document, you are advised to have regard to the content of the Plan to ensure compliance with same. Specifically, you are advised to have regard to Volume 9 – Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary and the Development Plan objectives listed below. The list of objectives sets out some of the main considerations from the Plan which are of relevance to the current proposal.</p> <ul style="list-style-type: none"> • CDP 2.14 Transition to a Low Carbon Economy and Society • CDP 6.10 Shannon Estuary • CDP 6.17 Energy Supply • CDP 6.18 Green Technology • CDP 8.8 Natural Resources • CDP 8.12Renewable Energy Development • CDP 11.41 Air Quality • CDP 11.43 SEVESO III Directive • CDP 11.44 Energy Security • CDP 11.45 Electricity Networks • CDP 11.47 Renewable Energy • CDO 11.48 Renewable Energy Strategy • CDP 11.49 Renewable Offshore Energy • CDP 11.50 Power Stations and Renewable Energy • CDP 11.51 Energy Storage • CDP 12.1 Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary Integrated Development of the Shannon Estuary • CDP 12.3 Marine-Related Industry/Large-Scale Industry on the Estuary Strategic Development Locations • CDP 12.4 Strategic Development Location B – Moneypoint • CDP 12.8 Harnessing the Energy Resources of the Shannon Estuary • CDP 12.15 Building on the Shannon Estuary as an Environmental Asset Offshore Renewable Energy (ORE) Development • CDP 15.3 European Sites • CDP 15.5 Natural Heritage Areas and proposed Natural Heritage Areas • CDP 15.9 Natural Heritage and Infrastructure Schemes 	ESB	N/A
--	---	-----	-----

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<ul style="list-style-type: none"> • CDP 15.10 Environmental Impact Assessment • CDP 15.11 Brownfield Site Regeneration and Contaminated Land • CDP 16.8 Sites, Features and Objects of Archaeological Interest <p>Specifically, CDP Objective 12.6 relates to Strategic Development Location B – Moneypoint and sets out the following:</p> <p>a) <i>To safeguard the role and function of Strategic Development Location B – Moneypoint as a key strategic driver of economic growth in the country, facilitating its sustainable growth, operational expansion and diversification, in accordance with national and regional energy objectives.</i></p> <p>b) <i>To support the redevelopment of the Moneypoint power generation station site as a green energy hub and the development of the Shannon Estuary as a focal point for the offshore wind industry in Europe.</i></p> <p>c) <i>To support and facilitate the development of marine related industry on lands adjacent to Moneypoint which is compatible with the primary use of the SDL as a Strategic Energy Location.</i></p> <p>d) <i>To ensure that all proposed developments shall be in accordance with the Birds and Habitats Directive, Water Framework Directive and all other relevant EC Directives.</i></p> <p>e) <i>To ensure that all proposed development at Strategic Development Location B shall incorporate the Mitigation Measures as contained in the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary for ensuring the integrity of the Natura 2000 Network.</i></p> <p><i>The lands at Moneypoint zoned for “Marine-Related Industry”. Lands zoned for such purposes “provide for marine-related industry and large-scale uses that create a synergy with the marine use. Marinerelated industry shall be taken to include the use of land for industry that, by its nature, requires a location adjacent to estuarine/deep water including a dependency on marine transport, transshipment, bulk cargo or where the industrial processes benefit from a location adjacent to the marine area”.</i></p>		

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p><u>Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary</u></p> <p>The Clare County Development Plan 2023-2029 contains specific economic development objectives for the Marine Related Industry site at Moneypoint which seeks to harness the economic potential of the Estuary at this location and to capitalise on its natural deepwater characteristics for enhanced maritime activity as already outlined in this submission. In addition, Volume 9 contains the Strategic Integrated Framework Plan for the Shannon Estuary which is accompanied by a separate Natura Impact Report and Strategic Environmental Assessment. The SIFP provides a strategic level of assessment in terms of future potential development. In particular, it highlights the key plan level surveys, investigations, data and mitigation measures which would be required for any such development in the estuary. Following the publication of the SIFP a significant implementation phase commenced which included the collation of key pieces of baseline information. Some of this baseline information is available through the Local Authority if deemed necessary to the individual project assessments or to the Concept level assessments. The data serves to reduce the lead in time required in terms of capturing some of this baseline information for example in relation to Bird Usage and should be explored in terms of its applicability to your investigations and assessments. Clare County Council would advise careful consultation with Volume I and associated volume of mitigation measures (Volume II) of the SIFP. Most recently the SIFP Steering Group have undertaken the preparation of a baseline noise map for the Shannon Estuary which aims to establish for the first time the baseline anthropogenic and environmental background noise which exists within this ecosystem and against which all future development can be assessment and bench marked. The outputs from this study consist of reporting and GIS datasets which are interoperable, interchangeable and can be interrogated with other datasets. Using the Quite Oceans Quonops model the output from the study consists of modelling and supply of baseline noise maps for the area which includes the Shannon Estuary and the 3 nautical mile extent from Counties Clare, Limerick and Kerry. The output includes for seasonal baseline noise mapsfor 125Hz Third Octave Band. In total 112 sound maps were delivered (4 seasons, 4 types of sound, 7 percentiles) The sound types included;</p> <ul style="list-style-type: none"> • Natural sound level (Natural sound level, produced by the wind) • Traffic (Sound level of the vessel traffic) • Baseline sound level (Combination of natural and traffic sound) <p>Baseline excess level (Level of traffic sound above environmental sound) The report and associated datasets is currently being finalised and will be signed off by the SIFP Steering Group in the coming weeks.</p>	<p>ESB SEA Team AA Team SFRA Team</p>	<p>Official response: This submission is acknowledged.. The SIFP is referred to in the NIR report but further information in relation to ongoing monitoring and available datasets have been provided.</p> <p>The availability of this data and monitoring shall be acknowledged in the SEA and the NIR reports and any reference to assessment and mitigation considered likely necessary at project stage should point to the availability of this data.</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p><u>Marine Area Planning</u></p> <p>Following the publication and enactment of the Marine Area Planning Act 2021 much of the consenting process associated with the various elements of the Green Atlantic concept will ultimately sit with the MARA and on An Coimisiún Pleanála. However, there may be elements or portions there of that fall within Part XXI of the Planning and Development Act 2000 (as amended) which will enable the planning authority to consider an application for development in the maritime area. In so far as possible it would be useful within the Concept Document to establish and set out the various marine activities e.g. dredging, energy related developments and the associated consents required under the MAP Act e.g. MAC, Maritime Licence and whether it will sit with ACP or the Coastal Planning Authority.</p>	ESB	Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	<p><u>Strategic Environmental Assessment</u></p> <p>Section 3.2.5.1 of the SEA Environmental Report outlines the SIFP as a sub-regional plan which it indicates is under review. This is not the case with respect to the SIFP nor was it re-published. It does form a separate volume of the Clare County Development Plan 2023-2029 however it wasn't separately republished, nor will it undergo review in the coming years. Given the SIFP is a non-statutory plan and further to the publication of the MAP Act which requires the preparation of sub-national maritime Plans (DMAPs) which is the statutory requirement, the SIFP will not be reviewed but will continue to provide guidance and background information with regards to future potential development within the Shannon Estuary. Once a West Coast/Shannon Estuary DMAP is prepared this will become the statutory marine Plan for the Shannon Estuary and wider West Coast area.</p>	SEA Team	Official Response: This submission is acknowledged. It is noted that the Department of Climate, Energy and the Environment are currently proceeding with a National Level Offshore Renewable Energy Designated Marine Area Plan. It is anticipated that the Green Atlantic at Moneypoint shall be referred to or referenced within said documentation. Following review, no modifications to the NIR are considered necessary.

	<p><u>Principle Environmental Effects</u></p> <p>The approach as undertaken within the SEA with respect to the incorporation of Overarching Principles (OPs) into the draft GA Concept together with an assessment of the ‘unmitigated’ scenario for each of the draft GA concepts is noted. The Local Authority would agree with this approach in terms of top down and bottom-up assessment in order to protect the environment and would deem this good practice.</p> <p>Table 8.2 is quite difficult to understand in terms of what the colour coding refers to or the level of environmental impact it reflects as there doesn’t appear to be a legend associated with this table. The assessment would benefit from an explanatory note or legend outlining the assessment categories.</p> <p>Coastal Infrastructure Zone (CIZ) – the assessment within Table 8.2 identifies the potential for the ESB to remove the existing jetty at Moneypoint and for the development of new quayside infrastructure including infilling/land reclamation and/or repurposing of the existing jetty and barge landing facility. The principles associated with this development zone predominantly reflect potential developments, alterations or changes within the transitional waters of the Shannon Estuary. There is therefore the potential for these changes to warrant consideration of IROPI in line with the requirements of Article 6 (4) of the Habitats Directive which should be flagged or set out at the Concept level. Given the publication of the Site-Specific Conservation Objectives for both the Lower River Shannon SAC and River Shannon and Fergus Estuaries SPA there should be an acknowledgment within the SEA Environmental Report taking the findings of the NIR into consideration that there may be a potential for a loss of an area of qualifying interest Annex I habitat if the development occurs within these identified areas. This is noting that the NIR clearly states “The draft GA Concept Coastal Infrastructure Zone is inclusive of areas which have been identified as either Annex I reef [1170] or estuaries [1130] habitat. In addition, an area of the Annex I QI habitat perennial vegetation of stony banks [1220] is present outside of, but adjacent to, the westernmost extent of the Coastal Infrastructure Zone”. A permanent loss of qualifying interest Annex I habitat in an SAC is likely to constitute an adverse effect on the integrity of the site in line with European Case Law. (See Court of Justice of the European Union ruling on the ‘Galway City Outer Bypass’ case, C-258/11.). This finding should either be reflected in the NIR, with consideration given to the potential for an Article 6(4) or IROPI case to be made for all or some of the specific projects, including details of compensation required. The Concept Document provides an opportune time to identify and set out areas or parts of the Shannon Estuary that could be considered as Compensation and to commence discussions with the Department of Housing, Local Government and Heritage around the applicability of these areas and the requirements from the Commission in regards to this. While the Local Authority fully appreciates the REPowerEU plan to accelerate the clean energy transition it does not circumvent the requirements of the Habitats Directive and the lead in time for such compensation measures to be established should not be underestimated. Ahead of the preparation of any future DMAP for the West Coast it would be prudent to undertake preliminary work in this area.</p>	<p>SEA Team AA Team ESB</p>	<p>Official response: This submission is acknowledged and noted. In relation to the Coastal Infrastructure Zone (CIZ), the potential for adverse effects on site integrity and the need for consideration under Article 6(4) and IROPI has been acknowledged within the NIR.</p> <p>Detailed discussions and decisions on compensation will be addressed at the project level when the nature and extent of impacts are known. At this strategic stage, it would be inappropriate to recommend mitigation measures, as these would not be bespoke to project-specific design, construction, or operational details and may not align with the final proposals. The principle of early engagement with the Department is noted for future planning stages.</p> <p>No modifications to the NIR are considered necessary.</p> <p>Regarding Table 8.2, the observation on the absence of a legend is acknowledged and will be considered for clarification in the final documentation.</p>
--	---	-------------------------------------	--

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p><u>Cumulative and in-combination effects.</u></p> <p>The SEA Environmental Report broadly speaks to the potential for cumulative and in-combination effects from the implementation of the draft GA Concept in combination with the increased development, land-use change and associated development emanating in line with any relevant LAPs/CDPs and any other plans which may affect areas in close proximity to development arising from the implementation of the draft GA Concept. It refers to the list of plans as outlined in Appendix A.2 however this list does not include for the Limerick or Kerry County Development Plans, or the Draft Clare County Biodiversity Action Plan 2025-2031. Please also note, the Clare County Heritage Plan is now published – Clare County Heritage Plan 2024- 2030. Of particular note is the absence of reference to the Shannon Foynes Port Company Vision 2041 Masterplan which not only sets out the vision for Foynes Port but for the entire estuary in terms of marine related industry and investment in particular around the emerging offshore renewable energy sector. The Masterplan document identified four core facilities on the Shannon Estuary to support the delivery of floating offshore wind at scale together with Wet Storage areas and the potential for cable corridors. These key infrastructural developments have the potential to act in combination with the Green Atlantic @ Moneypoint Concepts to lead to cumulative and in-combination effects on the same Qualifying Interests and Special conservation Interests of the associated European Sites through disturbance, habitat loss and fragmentation together with displacement over prolonged periods of time both as part of the construction and operational phases. It is essential that the Environmental Assessments which accompany the GA Concept document address these potential losses at an ecosystem level and establish protective Plan level Mitigation Measures which will ensure the protection of these sites at project level.</p>	<p>SEA Team AA Team</p>	<p>Official response: This submission is acknowledged and noted. The in-combination effects sections of the reports will be updated to include reference to the plans identified in the submission, including the Shannon Foynes Port Company Vision 2041 Masterplan and relevant County Development and Biodiversity Plans. Plan-level mitigation measures will be considered and developed as appropriate at the strategic stage, with detailed measures to be addressed at project level when specific design and construction details are available The In-Combination section of the NIR report shall be updated to include reference to these plans.</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p><u>Natura Impact Report</u></p> <p>Furter to the comments made above in relation to the SEA of the draft GA Concept the NIS highlights the potential for the Coastal Infrastructure Zone to give rise to the loss of areas of SCI wetland habitat of the River Shannon and River Fergus Estuaries SPA. However, there is no quantification of this loss in terms of percentage of the European site or the resultant impacts on the associated species which utilise this area. In addition, there is no assessment as to the cumulative impact associated with other potential developments within the Shannon Estuary which may lead to the loss of SCI wetland habitat.</p>	AA Team	<p>Official Response: It is acknowledged that there could be habitat loss arising from relevant projects; however, the total extent of loss cannot be quantified at this stage as project-level details are not available. The NIR recognises that any loss of QI habitat could constitute an adverse effect on site integrity and may require consideration under Article 6(4), including compensatory measures. The scale and nature of such measures will only be determined once detailed project proposals are developed.</p> <p>At this strategic stage, it would be inappropriate to recommend mitigation measures, as these would not be bespoke to project-specific design, construction, or operational details and may not align with the final proposals. Providing mitigation measures now could result in measures that are ineffective or unsuitable for the actual impacts. While cumulative impacts are an important consideration, these will also be assessed at project level when sufficient information on other developments and their interactions becomes available. No modifications to the NIR is considered necessary at this stage.</p>
	<p><u>Adjacent Amenities</u></p> <p>The immediate environs of the Moneypoint site comprise a mix of agricultural farmland, rural dwellings, a section of the national road network, and the estuary. The proposed redevelopment of the Moneypoint site should ensure that adjacent amenities and land uses are adequately protected during both the construction and the subsequent operational phases of the development.</p>	ESB SEA Team	<p>Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary</p>

Organisation/ Individual	Consultation feedback	For consideration of	Comment from AA Team
	<p><u>Visual Amenities</u></p> <p>It is noted that a new onshore substation is to be located either within the existing Moneypoint Site or in close proximity to the site. It is acknowledged that for technical requirements etc, it may be required to locate this infrastructure outside of the Moneypoint site. However, please note that, where possible, it is the preference of Clare County Council, on the grounds of the protection of adjacent amenities and visual amenities, that said works be appropriately accommodated within the footprint of the Moneypoint site.</p>	ESB	Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary
	<p>Clare County Council welcomes the preparation of this Draft Concept Document for the Green Atlantic @ Moneypoint project and would ask that this submission be considered as part of the preparation of the finalised report and look forward to furthering engagement in the process of its preparation.</p>	ESB	Official response: This submission is acknowledged and noted; however, following review, no modifications to the NIR are considered necessary