

Electricity Supply Board (ESB)

Green Atlantic @ Moneypoint Concept (GA Concept) 2025

Strategic Environmental Assessment (SEA) Statement

Reference: Issue

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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.

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Ove Arup & Partners Ireland Limited
50 Ringsend Road
Dublin 4
D04 T6X0
Ireland
[arup.com](https://www.arup.com)

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1. Introduction

1.1 Purpose of the SEA Statement

This Statement forms part of the Strategic Environmental Assessment (SEA) of ESB's adopted Green Atlantic @ Moneypoint Concept (referred to hereinafter as 'GA Concept') 2025, which covers the coming ten-fifteen-year time period. SEA is a systematic, on-going process for evaluating (at the earliest possible stage) the quantity and consequences of implementing certain plans and programmes on the environment. This SEA Statement is the final stage of the SEA process, and it is required under the European Communities Regulations 2004¹ (EU SEA Regulations) and national legislation² (SEA Regulations).

The purpose of the SEA Statement is to provide information on the decision-making process, and to document environmental considerations, the views of stakeholders and outline how recommendations arising from the SEA have been taken into account in the Plan. The four key requirements of this SEA Statement are to highlight:

- The incorporation of environmental considerations;
- Stakeholder involvement;
- Alterations considered; and
- Monitoring.

The SEA Statement is chronological in nature and includes the following:

- An outline of the methodology for undertaking a SEA;
- Scoping - an overview of the scoping process and summary of how the submissions received from stakeholders have been taken into account;
- Environmental Assessment - description of how environmental considerations have been integrated into the SEA;
- Alternatives - an outline of the reasons for choosing the plan to be adopted, in light of the other reasonable alternatives considered;
- Monitoring - an overview of the measures to monitor the plan going forward; and
- Final Appraisal - evaluation of the effectiveness of the SEA.

This SEA Statement will accompany the adopted GA Concept and be made available to the public.

1.2 ESB's GA Concept 2025

The GA Concept aims to enable the repurposing of the Moneypoint Generating Station site into a renewable energy hub and a strategic resource for the ORE sector, whilst also maintaining and operating Moneypoint Generating Station as the strategically critical Generating Station that it is at present. It sets out a single, spatial concept for the transformation of ESB's land at Moneypoint, County Clare.

The GA Concept provides an overall framework for the land's redevelopment in-line with this broader vision for the site. It enables individual projects to be seen in the context of this 'bigger picture' and wider land-use considerations for the Shannon Estuary. It is intended to engage stakeholders on ESB's plans for Moneypoint Generating Station site and to support individual project proposals and planning applications.

¹ European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, as amended by European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2004

² Planning and Development (Strategic Environmental Assessment) Regulations, as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations

ESB's activities are guided by ESB Corporate Policy. ESB's strategy 'Driven to Make a Difference: Net Zero by 2040' sets out a clear roadmap for ESB. It commits ESB to a Science Based Target for 2030 to provide assurance that the company is decarbonising our operations at the necessary pace and scale. The strategy sets out a pathway to achieve net zero in a way that supports ESB's continued growth and financial capacity to invest in a net zero future. The strategy commits ESB to:

- Delivering a five-fold increase in renewable generation capacity (to 5GW), reducing carbon intensity by two-thirds by 2030;
- Developing resilient infrastructure – including investing in battery and hydrogen technology and supporting the expansion of the renewable energy industry by facilitating connections to electricity transmission and distribution networks; and
- Empowering customers to live more sustainably with key investments in EV charging technology, energy retrofits and smart meters.

In-line with the Company strategy, ESB's strategic objectives for Moneypoint are:

- Objective 1 - To ensure Moneypoint continues to support economic development and activity in the Shannon Estuary, County Clare, the broader Region and State by providing a reliable source of electricity while ensuring the site is developed and operated to the highest environmental standards, in-line with ESB's Environmental Management Systems;
- Objective 2 - To transition the site to a new, lower carbon operating profile, moving progressively towards zero carbon generation with Moneypoint providing dispatchable electricity and energy storage to support an increasingly renewable energy sector;
- Objective 3 - To develop Moneypoint as a base for the offshore renewable energy sector, acting as a construction and deployment hub, and a manufacturing location for zero carbon fuels; and
- Objective 4 - To develop and operate Moneypoint so it supports Ireland's ambitions to become a net exporter of zero carbon energy.

The GA Concept was developed to identify the optimum sites for development, to bring about the transformation and redevelopment of Moneypoint Generating Station site in-line with ESB's stated objectives and broader corporate strategy.

Land-use objectives, as identified within the GA Concept, document are illustrated in **Figure 1.1**. ESB has compiled a number of development principles (refer to Section 8.2 of the SEA Environmental Report (ER)) for each zoned area in order to guide development in these areas. In all cases, development proposals will be subject of the appropriate consents and environmental assessment.

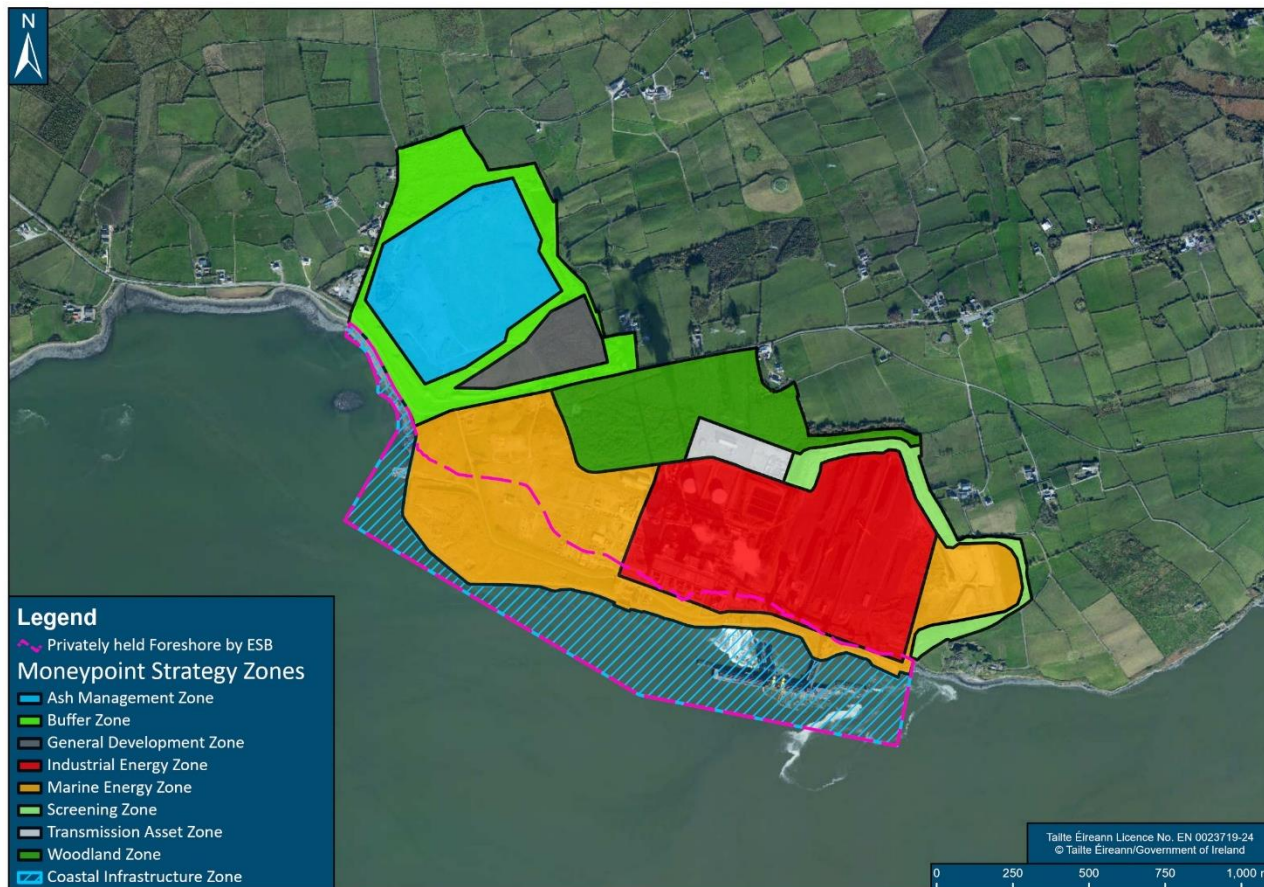


Figure 1.1 The GA Concept Strategy Source: (OSI, 2023)

1.3 Timing of the SEA

The preparation of the GA Concept and SEA process were carried out in parallel to ensure that environmental considerations were taken into account through all stages of the plan making process.

The timeline for these steps is set out in **Table 1.1**.

Table 1.1 Timeline of the GA Concept and SEA iterative process

GA Concept	SEA
Preparation of the GA Concept	Commencement of SEA Scoping Consultation: 26th February- 25th March 2024
Consultation on GA Concept: 15th July 2025 - 26th August 2025	Consultation on SEA ER, combined Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) and Strategic Flood Risk Assessment (SFRA): 15th July 2025 - 26th August 2025
Publication of GA Concept and SEA Statement: December 2025	

Section 5 of this SEA Statement provides a description as to how environmental considerations were incorporated into the plan making process.

2. SEA Methodology

2.1 Overview

This section highlights how the SEA was undertaken for the GA Concept. The SEA methodology is based on legislative requirements and relevant Environmental Protection Agency (EPA) guidance and will ensure compliance with the SEA Directive and associated legislation. The EPA's SEA Pack (Version 18/02/2020) was also used as a source of information during the scoping process.

The GA Concept (ESB), the SEA ER, combined Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) and Strategic Flood Risk Assessment (SFRA) (Arup) were prepared in an iterative manner whereby multiple revisions of each document were prepared, each informing subsequent iterations of the others. To facilitate this iterative approach, numerous discussions were held between ESB and Arup. The key stages outlined in Figure 2.1 were identified and are discussed in the following sections.

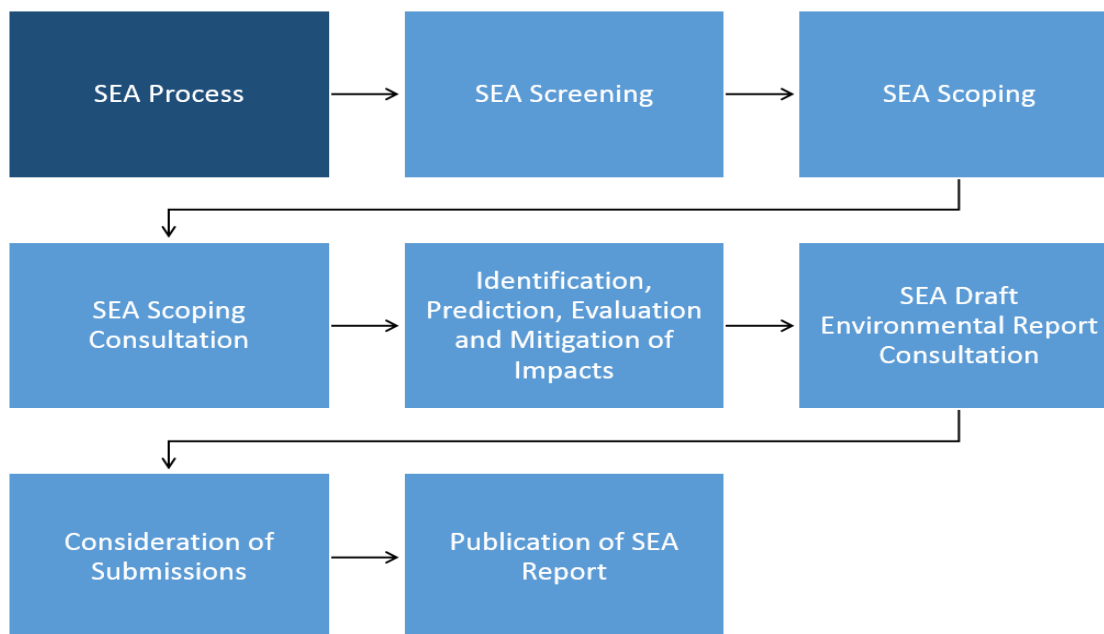


Figure 2.1 Key Stages of the SEA Process

2.2 Screening

Screening is the process for deciding whether a particular Plan would warrant SEA at the earliest possible opportunity, it also facilitates the assessment findings so that they can be factored into the Plan development process. A screening assessment was undertaken as part of this SEA process to determine if the GA Concept required a SEA.

The SEA screening assessment of the GA Concept concluded that the GA Concept is of a type of Plan/Programme (P/P) which falls within the remit of the SEA Directive/SEA Regulations. Further, the GA Concept is prepared by a national authority and is considered a P/P that is required by legislative provisions. The GA Concept is not considered to be exempt, and it is a P/P prepared for the land-use sector, that has the potential to set a framework for the development consent for projects listed in the EIA Directive. Thus, the GA Concept required mandatory SEA.

Ultimately, it was determined that the GA Concept is considered a type of P/P which falls within the remit of the SEA Directive, and that it required mandatory SEA, based on findings outlined within the Applicability Stage (Stage 1 of the SEA Screening process which determines the applicability of SEA to the P/P-maker and P/P and/or where relevant to confirm if mandatory SEA is required). The GA Concept was therefore taken forward to SEA Scoping.

2.3 Scoping

2.3.1 Scoping Process

Scoping is the process for establishing the range of environmental issues to be covered in the SEA and the level of detail that the assessment will investigate. Scoping also allows input from the environmental authorities and stakeholders to be incorporated. Essentially, responses submitted as part of the scoping process provide greater focus on the evolution of the adopted GA Concept.

The considerations addressed in the scoping of the GA Concept were as follows:

- The key elements of the GA Concept to be assessed;
- The environmental aspects to be assessed as part of the SEA;
- Identification of relevant international, national and local plans, objectives and environmental standards that may influence or impact on the GA Concept;
- Development of Environmental Objectives, Indicators and Targets to allow the evaluation of impacts as part of the SEA; and
- Identification of any reasonable alternative means or scenarios for achieving the strategic goals of the GA Concept.

The SEA Scoping was a key part of the assessment process as it set out the extent of the SEA and provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

2.3.2 Scoping Consultation

The Scoping Report was issued for comment by defined statutory bodies and environmental authorities on the 26th of February 2024. The statutory consultees were given a period of four weeks to respond with any observations or submissions on the content of the SEA Scoping Report.

The Scoping Report summarised the key environmental issues and outlined relevant plans and programmes that were likely to affect or be affected by the GA Concept.

This information was then used to set out a series of SEA Objectives, Indicators, and associated Targets. The Objectives and Targets established aims and thresholds which would be taken into consideration to effectively assess the impact of the GA Concept on the environment. Indicators are used to track the achievements of Objectives and Targets, describe the baseline situation, monitor the impact on the environment and predict impacts.

2.3.3 Scoping Responses

Four submissions were received in response to the SEA Scoping Report, from the Environmental Protection Agency (EPA), Geological Survey Ireland (GSI), the Department of Agriculture, Environment and Rural Affairs (DAERA) – Northern Ireland Environment Agency (NIEA) – SEA Team, and the Department of Housing, Local Government and Heritage (DHLGH) – Development Applications Unit (DAU). All comments, observations and submissions contained therein were considered and incorporated into the assessment process, as considered relevant. **Appendix A.1** of this report contains a summary of the submissions received in the SEA Scoping Report and how they were responded to.

The SEA Directive requires that where the GA Concept has potential for transboundary environmental effects these must be addressed within the SEA. In accordance with SEA Directive and EPA Guidance, the relevant statutory consultee in Northern Ireland was also contacted during the Scoping consultation period.

2.4 Baseline Assessment

Gathering relevant information that describes the current environment within the GA Concept area is an integral part of the SEA process. The SEA Directive requires that certain information on the existing environment is presented to help assess the implementation of the GA Concept, as well as helping establish how the environment would change if the GA Concept were not implemented.

Baseline information has been collected from readily available sources, and a Geographical Information System (GIS) was used to graphically present and analyse relevant information. The baseline of the Plan area, i.e., the area to which the adopted GA Concept applies, is reported in Section 5 of the SEA ER ('Current State of the Environment'). The findings of (but not limited to) Ireland's Air Quality Report 2023, CSO 2022 Statistics, Ireland's State of the Environment Report 2024, Ireland's Provisional Greenhouse Gas Emissions 1990-2023, ESB's Moneypoint Generating Station Annual Environmental Report (AER) and a number of energy related documentation, namely, SEAI's Energy in Ireland Report (2024) were integrated into the SEA ER.

2.5 Environmental Assessment

2.5.1 Overview

The environmental assessment ran in parallel to the development of the GA Concept. The environmental assessment process was undertaken in accordance with best practice SEA principals and guidance.

The environmental assessment comprised a review of the baseline data, identification of likely impacts and development of appropriate mitigation measures for the GA Concept.

An appraisal matrix was developed to facilitate the assessment of the objectives outlined in the GA Concept.

The matrix AA led assessment provided a holistic, integrated, and interactive approach to the formation of the objectives in the adopted GA Concept. The assessment also considered the findings of the and SFRA.

A number of iterations of this assessment matrix were undertaken, between the SEA/AA Team and ESB - refer to Section 2.5.4 and Section 2.5.5.

2.5.2 Objectives, Indicators and Targets

The objectives, indicators and targets are the aspects for which the GA Concept is assessed against. The objectives within the GA Concept are assessed against a range of environmental objectives and targets established for the purpose of the SEA. Further, indicators that are recommended in the SEA are utilised over the lifetime of the GA Concept to quantify the level of impact that the proposed plan may have on the environment.

A range of SEA Objectives, Indicators and Targets were recorded in the SEA ER which went out for public consultation from the 15th July 2025 until 26th August 2025. Following review of submissions, some updates were made to the same, and the final SEA ER has been updated to incorporate these changes.

A summary of the final Objectives, Indicators and Targets is included in Table 2.1.

Table 2.1 Objectives, Indicators and Targets

Environmental Component	Strategic Environmental Objective	Targets	Indicators
Population and Human Health (P&HH)	<ol style="list-style-type: none"> 1. Protect and enhance human health and well-being. 2. To ensure operations at Moneypoint Generating Station site are carried out safely. 3. Provide employment for the local community. 4. Provide improved low-carbon electricity supply and security across Ireland. 	<ol style="list-style-type: none"> 1. No deterioration in human health as a result of environmental factors. 5. Avoidance of health & safety incidents from occurring on site 6. No increase in number of complaints relating to disturbance or pollution from site activities and operations. 7. Long-term increase in employment opportunities associated with the GA Concept. 8. Continuation of energy generation. 	<ol style="list-style-type: none"> 2. Perceived health of the local community. 9. Number of site-related accidents/incidents reported. 10. Number of complaints received pertaining to disturbance or pollution. 11. Direct and indirect employment created by ESB/ORE Developers utilising the Moneypoint Generating Station Hub. 12. Provision of improved low-carbon electricity supply and security across Ireland.
Biodiversity (BIO)	<ol style="list-style-type: none"> 3. Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species, and wildlife corridors. 13. Support the achievement of the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation. 14. Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildlife Sanctuaries as well as protected species outside these areas as covered by the Wildlife Act. 15. To minimise and, where possible, eliminate threats to biodiversity including invasive species. 	<ol style="list-style-type: none"> 4. No loss of diversity and integrity of the broad range of habitats, species, and wildlife corridors, during the lifetime of the GA Concept. 16. Improve/maintain protection for protected sites and species and protection for important wildlife sites, particularly wildlife corridors. 17. Maintenance of favourable conservation status for all habitats and species protected under the Habitats and Birds Directives. 18. Prevent the introduction of new invasive or alien species. Control/manage existing regulated invasive species. 	<ol style="list-style-type: none"> 5. Presence and status of existing biodiversity on site. 19. Level of biodiversity gain achieved as a result of the implementation of the GA Concept. 20. Number and condition of Natura 2000 network, European sites in or along the Moneypoint Generating Station site boundary, as per Article 17 Reports, and the maintenance of conservation objectives. 21. Level of biodiversity change lost as a result of the implementation of the GA Concept; and 22. Number of incident responses onsite e.g., invasive species (for example, Japanese knotweed).
Land and Soil (L&S)	<ol style="list-style-type: none"> 6. Protect soils against pollution. 23. Minimise the excavation and movement of soils within site works. 24. Protect the coastline from erosion. 	<ol style="list-style-type: none"> 7. No incidences of soil contamination through adoption of appropriate environmental protection procedures during any construction, operation or maintenance works. 25. Ensure appropriate management of existing contaminated soil in accordance with the requirements of current waste legislation. 26. No significant erosion of the coastline 	<ol style="list-style-type: none"> 8. Incidences of spillages/leaks reported on site. 27. Incidences occurring to soil, in particular relating to any potential contamination from landfill. 28. Areas and rates of coastal erosion within the site.

Environmental Component	Strategic Environmental Objective	Targets	Indicators
Water (WAT)	<p>9. No negative impacts on the status of transitional waters, surface waters and groundwater, and to provide no impediment to the achievement of water body objectives under the WFD.</p> <p>29. No negative impacts on flood risk management activity, and to provide no impediment to the implementation of the Floods Directive.</p>	<p>10. All waters within the GA Concept area to achieve the objectives of the Water Framework Directive and the relevant River Basin Management Plan by 2027.</p> <p>30. No flood risk at port facilities, with no transferred flood risk to the local area.</p>	<p>11. Status and quality of waterbodies on and near the Moneypoint Generating Station site.</p> <p>31. Level of compliances with EPA – IE Licence.</p> <p>32. Number of significant pollution events recorded as a result of the implementation of the GA Concept.</p> <p>33. Instances of flooding in the GA Concept area.</p>
Air and Climate including Noise (AQ, C&N)	<p>12. To avoid, prevent or reduce harmful effects on human health resulting from the emissions to air from construction and operation at the Moneypoint Generating Station site.</p> <p>34. Maintain and promote continuing improvement in air quality and climate through the reduction of emissions and promotion of net zero energy generation.</p> <p>35. Minimise noise and vibration impact from Moneypoint Generating Station site operations and remain at or below legislative standards or limits.</p> <p>36. Minimise emissions of greenhouse gases and port carbon footprint from development and activity (where possible).</p> <p>37. Adaptation to climatic change.</p>	<p>13. No breaches of legislative standards or limits resulting from port development and activity.</p> <p>38. No increase in GHG emissions and carbon footprint from site development and operations</p> <p>39. No risk from climate change influenced flooding at the Moneypoint Generating Station site, with no transferred risk to the local area.</p>	<p>14. General air quality results in proximity to Kilrush, Co. Clare.</p> <p>40. Level of compliances with IE Licence.</p> <p>41. Rates of energy and or renewable energy consumption.</p> <p>42. The level of GHG emissions from the Moneypoint Generating Station site and the changes in GHG emissions over the GA Concept period.</p> <p>43. As follows:</p> <p>44. Onsite noise and dust monitoring at Moneypoint Generating Station site.</p> <p>45. Number of complaints received relating to dust and or noise.</p>
Archaeological, Architectural and Cultural Heritage (AA&CH)	<p>15. Protect sites places, features, buildings, and landscapes or seascapes of cultural, archaeological, or architectural heritage and their context from significant adverse effects resulting from the implementation of the GA Concept.</p>	<p>16. Any projects progressed under the GA Concept will adhere to the 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.</p>	<p>17. Avoidance of significant adverse effects, both direct and indirect, to sites and features of archaeological/architectural/cultural heritage (both terrestrial and underwater) as a result of the implementation of the GA Concept.</p>
Landscape and Visual (L&V)	<p>18. Protect, and where possible enhance, the landscape / seascape character and visual amenity in the vicinity of the Moneypoint Generating Station site.</p>	<p>19. Any construction works and structures should be planned with cognisance of landscape and seascape sensitive areas and protected views/ prospects.</p>	<p>20. No deterioration of landscape and or seascapes or areas with scenic value e.g., Protected Views as a result of the implementation of the GA Concept.</p>

Environmental Component	Strategic Environmental Objective	Targets	Indicators
Material Assets (MA)	<p>21. Provide improved low-carbon electricity supply and security across Ireland.</p> <p>46. Make best use of existing infrastructure and promote the sustainable development of new infrastructure related to the GA Concept, where appropriate.</p> <p>47. Minimise waste generation and increase the rates of reuse and recycling at Moneypoint Generating Station site.</p> <p>48. To carefully manage water usage and wastewater generated at the site, in accordance with IE Licence conditions.</p>	<p>22. Contribute to the continuity of energy supply in Ireland, in particular low-carbon energy supply and security.</p> <p>49. Minimal or no disruption to local services as a result of development on site</p> <p>50. Increased rates of reuse and recycling on the site, and reduced levels of waste being sent to landfill.</p> <p>51. No increase in water usage and wastewater generated outside of IE Licenced limits.</p>	<p>23. Rates of energy and or renewable energy generation.</p> <p>52. Records of local service disruption events.</p> <p>53. Quantity of waste generated, and levels of waste reused or recycled on site.</p> <p>54. Level of compliances with IE Licence.</p>

2.5.3 Consideration of Alternatives

2.5.3.1 Introduction

As described in the SEA ER, a number of alternative GA Concept scenarios were considered and assessed as part of the SEA.

Article 5.1 of the SEA Directive requires the SEA ER to consider “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”. Annex 1(h) of the SEA Directive, as replicated in paragraph (h) of Schedule 2B of the Planning and Development Regulations 2001, as amended, requires “an outline of the reasons for selecting the alternatives”. This suggests that there are two stages to the consideration of alternatives:

1. Identify reasonable alternatives; and
2. Evaluate and compare the alternatives.

The alternative scenarios considered and assessed as part of the SEA ER are summarised in Section 2.5.3.2.

2.5.3.2 Identification of Reasonable Alternatives

The GA Concept includes the consideration of alternative options for the future development of the site. These scenarios largely assumed that land uses such as the transmission infrastructure would be largely unaltered and assumed a variable level of remediation and redevelopment across the ash storage area, main site and coal storage area. A summary of each Alternative Concept is provided as follows.

1. Alternative A - Do Nothing

In this scenario the lands would continue the present-day operations and there would be no significant change to the established land uses at Moneypoint. The existing ASA and FGD landfill area would be capped and managed as on-going **Brownfield Lands (BL)**.

In line with ESB corporate commitments, Moneypoint Generation Station would cease coal fired generation in 2025 with the conversion to HFO as proposed, contingent on a grant of planning permission. Subject of further consent being granted to repower or reconfigure the station, the extensive **Industrial Energy Zone (IEZ)** (including the coal storage area) would be undeveloped.

Within the wider **General Development Zone (GDZ)** the Moneypoint Wind Farm and Synchronous Compensator would continue to operate as normal. The site would continue to act as an important electricity **transmission** node, accommodating significant high voltage networks assets onto the national grid. It would see no significant re-development associated with renewable energy, with the exception of possible new connection points for offshore wind farms.

The vegetated **Woodland Zone (WZ)** bounding onto the N67 would remain unchanged. There would be no change to the **Coastal Infrastructure Zone (CIZ)** – namely the existing jetty remaining in place.

2. Alternative B - GA Concept 1

In this scenario the nature of present-day operations would change to facilitate additional large-scale thermal generation, with a relatively small facility to support offshore wind energy projects.

Subject to consent for the remediation of the coal storage area and excavation of the FGD landfill area, the central IEZ would expand to accommodate new generation activity, likely to include gas fired generation and, in time, new zero generation fuelled by hydrogen, ammonia etc., associated with the importation of at-scale renewable energy from offshore renewable energy projects off the west-coast.

The existing ASA north of the N67 would be capped and managed as on-going BL.

Lands to the west of the station would be redeveloped to accommodate activities associated with offshore wind projects, namely the Moneypoint Hub within a Marine Energy Zone (MEZ). Within the wider IEZ, the Moneypoint Wind Farm and Synchronous Compensator would continue to operate as normal. The site would

continue to act as an important electricity transmission node, accommodating new connection points for offshore wind farms within the vegetated WZ bounding onto the N67.

On the eastern boundary, the transition between the Moneypoint lands and the adjacent agricultural lands would incorporate the underground cable corridor within a Screening Zone (SZ).

The level of development associated with the CIZ would depend on the scale of activity associated with the Hub but would be limited to the private foreshore area. Such works could include land reclamation, or construction of new structures such as piers and jetties, as necessary to facilitate the large-scale hub for the construction, assembly and deployment of wind turbines (i.e. delivery of turbine components, deployment of substructures, assembly of turbines and limited storage, at the quayside). The configuration of new quay infrastructure would be designed to mitigation impacts to the adjacent environmentally sensitive/designated areas.

3. Alternative C - GA Concept 2

In this scenario the nature of present-day operations would change fundamentally with the removal of all infrastructure associated with large-scale thermal generation – enabling the entire site to be used for the development of a facility to support offshore wind energy projects, the Moneypoint Hub, within a MEZ.

Both the existing ASA north of the N67 and the FGD landfill area to the east would be remediated (likely with the removal of ash) and the sites developed to accommodate new thermal general activity within an IEZ, likely to include gas fired generation and, in time, new zero generation fuelled by hydrogen, ammonia etc, associated with the importation of at-scale renewable energy from offshore renewable energy projects off the west-coast. The continued presence of the Moneypoint Wind Farm and Synchronous Compensator would be considered in the context of broader site development. The site would continue to act as an important electricity transmission node, accommodating new connection points for offshore wind farms within the broader site but maintaining the ecological integrity of the vegetated WZ.

On the eastern boundary, the transition between the Moneypoint lands and the adjacent agricultural lands would incorporate the underground cable corridor within a SZ.

The level of development associated with the CIZ would depend on the scale of activity associated with the Hub but would be limited to the private foreshore area. Such works could include land reclamation, or construction of new structures such as piers and jetties, as necessary to facilitate the large-scale hub for the construction, assembly and deployment of wind turbines (i.e. delivery of turbine components, deployment of substructures, assembly of turbines and limited storage, at the quayside). The configuration of new quay infrastructure would be designed to mitigation impacts to the adjacent environmentally sensitive/designated areas.

4. Alternative D - GA Concept 3

In this scenario the site would be developed to meet generation and transmission requirements for the medium and long-term. The transmission infrastructure and synchronous compensator will remain within an expansive **MEZ** that will accommodate the Moneypoint Hub, based on the phased availability of lands on the site.

Within the central core of the site the existing **IEZ** will remain at its current extent allowing for its re-development as the site transitions to increasingly lower carbon dispatchable energy generation, while protecting the site's strategic function as a nationally significant electricity generation asset. These activities may include gas fired generation and, in time, new zero carbon generation fuelled by hydrogen, ammonia etc, associated with the importation of at-scale renewable energy from offshore renewable energy projects off the west-coast. Given the need to meet security of supply demands, the development of that area will be phased and likely occur in parallel with other smaller thermal units being developed within the broader **MEZ**. The Coal Storage Area will require decommissioning and remediation, subject of a grant of consent.

The partial or wholesale remediation and redevelopment of the existing ASA north of the N67, within a **Landfill Management Zone (LMZ)**, will be subject to consenting for plans to remove existing ash. Given the visual sensitivity of the ASA, a **Buffer Zone (BZ)** that will accommodate small scale, low-level development to manage the transition between industrial and greenfield lands, will surround that site to provide visual screening of new development. The area between the ASA and the N67, may be suited to

limited scale General Development. The site would continue to act as an important electricity transmission node, accommodating new connection points for offshore wind farms within the broader site but maintaining the ecological integrity of the vegetated **WZ**.

On the eastern boundary, the transition between the Moneypoint lands and the adjacent agricultural lands would incorporate the underground cable corridor within a **SZ**. The level of development associated with the **CIZ** would depend on the scale of activity associated with the Hub but would be limited to the private foreshore area. Such works could include land reclamation, or construction of new structures such as piers and jetties – as necessary to facilitate the large-scale hub for the construction, assembly and deployment of wind turbines (i.e. delivery of turbine components, deployment of substructures, assembly of turbines and limited storage, at the quayside). The configuration of new quay infrastructure would be designed to mitigate impacts to the adjacent environmentally sensitive/designated areas.

5. Alternative E - GA Concept 4

In this scenario the site would be developed to meet generation and transmission requirements for the medium and long-term. The transmission infrastructure and Synchronous Compensator will remain within an expansive **MEZ** that will accommodate the Moneypoint Hub, based on the phased availability of lands on the site.

To protect the site's strategic function as a nationally significant electricity generation asset, the central **IEZ** will be expanded east into the coal storage area to accommodate new generation activity, likely to include energy storage and lower carbon fired generation (HVO or Distillate) and, in time, new zero generation fuelled by hydrogen, ammonia etc associated with the importation of at-scale renewable energy from offshore renewable energy projects off the west-coast. Given the need to meet security of supply demands, the development of that area will be phased and likely occur in parallel with other smaller thermal units being developed within the broader **MEZ**.

The partial or wholesale remediation and redevelopment of the existing ASA north of the N67, within a **LMZ** will be subject to consenting for plans to remove existing ash. Given the visual sensitivity of the ASA, a **BZ** that will accommodate small scale, low-level development to manage the transition between industrial and greenfield lands, will surround that site to provide visual screening of new development. The area between the ASA and the N67, may be suited to limited scale General Development. The site would continue to act as an important electricity transmission node, accommodating new connection points for offshore wind farms within the broader site but maintaining the ecological integrity of the vegetated **WZ**.

On the eastern boundary, the transition between the Moneypoint lands and the adjacent agricultural lands would incorporate the underground cable corridor within a **SZ**. The level of development associated with the **CIZ** would depend on the scale of activity associated with the Hub but would be limited to the private foreshore area. Such works could include land reclamation, or construction of new structures such as piers and jetties – as necessary to facilitate the large-scale hub for the construction, assembly and deployment of wind turbines (i.e. delivery of turbine components, deployment of substructures, assembly of turbines and limited storage, at the quayside). The configuration of new quay infrastructure would be designed to mitigate impacts to the adjacent environmentally sensitive/designated areas.

Refer to Section 7.2 of the SEA ER for the full map illustrations of each of the alternative scenarios and refer to Section 7.3 of the SEA ER for the evaluation and comparison of the alternative scenarios.

Conclusion – Preferred Scenario

In terms of preferred scenario, Alternative D and E are considered to be the Preferred Scenarios for the GA Concept from an environmental perspective.

Although Alternative D and E will give rise to similar levels of development as Alternatives B and C, Alternative D and E will retain the vegetated Woodland Zone on site, include a Screening Zone (east of the site) and also include a Buffer Zone which surrounds the Ash Management Zone and the General Development Zones. There is further potential for positive impacts to ecology and surrounding sensitive receptors where both the Buffer Zone and Screening Zones are incorporated into the Moneypoint Generating Station site. Thus, it is considered that Alternative D and E are likely to result in less significant environmental degradation than that of Alternative C, D and E, and will aid decarbonisation and security of

supply for energy across Ireland. However, in terms of overall preferred Scenario from a plan development perspective, Alternative E - GA Concept 4 was chosen.

Refer to Section 7.3.7 of the SEA ER for further details.

2.5.4 Assessment Stage 1

The first stage of the SEA assessment process comprised the first draft of the appraisal matrix that was completed by the SEA team. This was based on the initial draft of the GA Concept and was provided to ESB for their consideration.

This objectives-led assessment compared the likely impacts of each objective in the initial GA Concept against the strategic environmental objectives (as described in Section 2.5.2) with respect to the baseline information. Particular reference was made to the potential for cumulative effects in association with other relevant plan and programmes.

The assessment process categorised environmental impacts using the ratings outlined in Table 2.2 which is based on the impact assessment criteria defined by the EPA for environmental impact assessment.

Table 2.2 Impact Ratings

Significance of Impact	
	Positive
	Neutral
	Negative
	Uncertain (Unknown or both positive and negative effects likely)

The assessment also considered the potential for cumulative effects of policies on each other to determine if certain policies working in combination could have an environmental impact.

Upon completion of the first appraisal matrix, a number of recommendations were made which were then reviewed in detail by ESB and where appropriate, incorporated into the GA Concept, such as changes to wording of principles.

2.5.5 Assessment Stage 2 - Final Plan

The next stage of the assessment comprised the revision of the appraisal matrix to take on board comments received from ESB on the initial draft GA Concept and the associated first draft appraisal matrix.

This appraisal matrix was incorporated into the SEA ER that accompanied the GA Concept that was on public consultation from 15th July 2025 until 26th August 2025. The principle environmental effects, as per the assessment matrix, identified are summarised below, relevant to the proposed principles.

The principles in the GA Concept were assessed with respect to the existing environmental baseline and the environmental objectives, indicators, and targets. The assessment included in Section 8 of the SEA ER also took regard for transboundary effects of the GA Concept on Northern Ireland (Section 5.10 of the SEA ER).

The principles included in the GA Concept were developed as a means to repurpose Moneypoint Generating Station site into a renewable energy hub and a strategic resource for the ORE sector, as a result the environmental assessment outcomes are generally positive, or neutral in relation to AQ, C&N, P&HH and MA.

Overall, potential for positive impacts were identified with regards to MA and P&HH due to the gradual decarbonisation of the Moneypoint Generating Station site and the promotion of a continued and improved supply of energy across Ireland. However, with regards to MA, it is noted that there may be potential for negative impacts to occur on aquaculture where any development is likely to occur in the CIZ. Any development likely to occur in the CIZ must include an assessment of impacts on aquaculture in Shannon Estuary.

Predominantly positive impacts have been assessed as likely to occur for AQ, C&N. There is potential for negative impacts on Air, Climate and Noise during any construction works required to implement the GA

Concept. However, predominantly positive ratings were predicted for Air, Climate and Noise as a result of facilitating a gradual reduction and phasing out of coal and oil-fired electricity generation through the GA Concept.

In order to achieve the gradual decarbonisation of the Moneypoint Generating Station site, substantial development and construction will be necessary. Thus, potential for negative impacts have been identified for BIO, WAT and L&S in all principles that relate to development. It was noted throughout the assessment of effects that, where development will be taking place in zones of greenfield sites (e.g., the GDZ, BZ, SZ and WZ), more significant negative impacts are likely to occur, than when development is proposed on a brownfield site (e.g., the MEZ, CIZ, IEZ and AMZ).

With regards to AA&CH, neutral and uncertain impacts are anticipated across the principles. Overall neutral impacts are likely to occur in that, the Moneypoint Generating Station site comprises highly disturbed land, and so the likelihood of discovering previously unknown archaeological features is low. Furthermore, a detailed assessment of the cultural heritage potential of the site was also prepared and informed the GA Concept, refer to Appendix A.5. However, negative impacts were also identified where development is proposed in zones that are predominantly greenfield in nature and where principles propose development in or along the Coastal Infrastructure Zone, as there may be potential for negative impacts on previously unknown/ unrecorded marine archaeology.

Predominantly neutral impacts have been assessed as likely to occur for L&V. There is potential for negative impacts on L&V where development is likely to occur, especially where development is likely to be large scale in nature. Potential for uncertain impacts were also assessed where the type, scale and location of the potential development is currently unknown.

Predominantly positive and neutral impacts were identified for principles that describe the appropriate development that will take place having regard to ecological, visual, or heritage-based sensitivity, and managing the site/zones in accordance with the appropriate licences and consents.

Neutral impacts were assessed across principles that represent a continuation of the existing environment.

2.5.6 Interactions and Interrelationships

In accordance with the SEA Directive, the inter-relationship between environmental aspects must be taken into account. The interaction and inter-relationships of relevance for the environmental baseline aspects was an important consideration for the environmental assessment.

Table 2.3 outlines the identifiable inter-relationships that were taken into account during the environmental assessment. It is noted that all environmental aspects interact with each other to some extent, however only significant relationships were considered.

Table 2.3 Key inter-relationships between environmental aspects

Environmental Aspect	P&HH	Bio	L&S	Wat	AQ, C&N	AA&CH	L&V	MA
P&HH								
Bio	No							
L&S	Yes	Yes						
Wat	Yes	Yes	Yes					
AQ, C&N	Yes	Yes	No	No				
AA&CH	No	No	Yes	No	No			
L&V	Yes	Yes	No	No	No	No		
MA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	

2.6 SEA ER – Consultation

A period of public and statutory consultation process took place from 15th July 2025 and 26th August 2025 to gather feedback on the GA Concept and supporting SEA ER, in accordance with legislative requirements. The documents were issued to statutory stakeholders and made available for public viewing on the ESB website and at Moneypoint Generating Station, Carrowdotia, Killimer, Co. Clare.

Six submissions were received on the GA Concept and SEA ER during this time. The content of submissions and comments received during this consultation period were considered by both Arup and ESB.

Amendments were made in response to those consultation inputs, where considered appropriate. Both the SEA ER, and the GA Concept were updated on foot of the recommendations outlined in the submissions received. **Appendix A.2** contains a summary of the submissions received and how they were responded to.

2.7 Technical Difficulties Encountered

No technical difficulties were encountered during the preparation of this SEA ER.

2.8 SEA Mitigation Measures

Mitigation measures are measures envisaged and designed to prevent, reduce and as fully as possible offset any significant adverse effects on the environment during both the construction and operational phases of the implementation of the GA Concept. All mitigation measures have been developed and agreed with ESB as part of the SEA iterative process.

It is recommended that all environmental requirements and guidelines outlined in the SEA ER are adhered to. In addition, future legislation, policies, environmental requirements and guidelines should also be fully integrated into the GA Concept and SEA ER.

In general terms, all proposals for development will be required to have due regard to environmental considerations outlined in the SEA ER and associated AA. In addition, many impacts will be more adequately identified and mitigated at project and EIA/AA level. Any new projects or plans arising from the implementation of the GA Concept shall be subject to appropriate environmental assessments, where required.

It should also be noted that Moneypoint Generating Station site is licenced by the EPA under an Industrial Emissions (IE) Licence (Ref. P0605-04). The IE Licence authorises the following activities:

- Activity 1.1 (IED) / 2.1 (EPA Act 1992, as amended): “Combustion of fuels in installations with a total thermal input of 50MW or more”; and
- Activity 5.4 (IED) / 11.5 (EPA Act 1992, as amended): “Landfills, within the meaning of section 5 (amended by Regulation 11(1) of the Waste Management (Certification of Historic, Unlicensed Water Disposal and Recovery Activity) Regulations 2008 (SJ. No 524 of 2008) of the Act of 1996, receiving more than 10 tonnes of waste per day or with a total capacity exceeding 25,000 tonnes, other than landfills of inert waste”.

The IE Licence contains conditions on how the activity must operate in order to protect the environment from pollution that might otherwise arise. Limits and controls are imposed on emissions to air, water, dust, and noise. The Licence also includes requirements relating to site operations, such as, the implementation of an EMS, energy efficiency, incident response and waste management. In line with the IE Licence, environmental monitoring of the site is on-going. Throughout its operation, Moneypoint Generating Station has been maintained and improved to meet relevant environmental standards, and the IE Licence reviewed as appropriate.

Moneypoint Generating Station is also an Upper Tier Control of Major Accident Hazard (COMAH) site and therefore falls under the requirements of the COMAH Regulations (2015).

Lastly, ESB has held a foreshore lease (Ref. No. FS006389 (MS51/11/126) for the area where a jetty is located, since 1985. Additional foreshore consent (Ref. No. FS006318) was granted to ESB in 2015 to facilitate the erection of wind turbines on the site. Since 2015, the entire foreshore area (Ref. No. CE57420F) is under ESB ownership.

The majority of principles included in the GA Concept are predicted to have a positive environmental effect, particularly on P&HH, AQ, C&N and MA. However, a number of principles are proposed that may have a negative environmental effect, particularly those relating to new development where BIO, L&S, WAT and L&V impacts may arise. The relevant mitigation measures outlined in Table 2.54 below should be adhered to in full during the implementation of the GA Concept.

Further, as outlined in Section 3 of this report, a combined Screening for AA and NIS has been prepared for the GA Concept. The SEA ER, combined Screening for AA and NIS and SFRA mitigation measures have been appended to form part of the final GA Concept. The recommendations of the SEA ER, combined Screening for AA and NIS and the SFRA report have been incorporated into the GA Concept.

2.8.1 Inherent Mitigation

Any developments arising from the implementation of the GA Concept must comply with ESB's IE Licence (Ref. P0605-04). This Licence ensures all operations at the Moneypoint Generating Station site comply with environmental law to ensure that these operations don't endanger human health or harm the environment.

Furthermore, any developments arising from the implementation of the GA Concept shall comply with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following:

- EU Directives, including the Habitats Directive (92/43/EEC, as amended), the Birds Directive (2009/147/EC), the Environmental Liability Directive (2004/35/EC), the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EC), the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC);
- National legislation, including the Wildlife Acts 1976 and 2010 (as amended), the Planning and Development Act 2000 (as amended)³ and associated regulations, Environmental Impact Assessment Regulations, the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), the Flora Protection Order 2015;
- National policy guidelines;
- Catchment and water resource management plans;
- Biodiversity plans and guidelines including Ireland's 4th National Biodiversity Action Plan 2023-2030, All-Island Pollinator Plan; Clare Biodiversity Action Plan 2017-2023; and
- Requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EU), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Water) Regulations 2009 (SI No. 272 of 2009), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations, 2010 (S.I. No. 9 of 2010) and other relevant EU Directives, including associated national legislation and policy guidance (and any updated/superseding documents).

One notable aspect of the GA Concept is the direct integration of Overarching Principles (OPs) into the plan, which function as SEA mitigation measures and reflect recommendations from the environmental assessment of the draft GA Strategy. The ESB has given these recommendations careful consideration and formally adopted them into the Concept Strategy, demonstrating adherence to best practices in environmental due diligence. The OPs will apply to individual projects promoted by implementation of the GA Concept. The OPs have potential to mitigate significant environmental effects at individual project level. Refer to Table 2.4 for the full list of OPs.

³ **Note:** The new Planning and Development Act (2024) was signed into law on the 17th of October 2024; however, the Act is currently being commenced on a phased basis to facilitate the transition from the arrangements under the current Act to those under the new Act. At the time of writing this report, certain provisions of the Act (2024) are yet to be commenced, including those relevant to SEA. It is envisaged that the commencement of the remainder of the Planning and Development Act 2024 will be carried out across 4 phases in 2025/2026. As the relevant provisions to SEA have not yet been commenced in the new Planning and Development Act 2024, this report references the Planning and Development Act 2000, as amended.

Table 2.4 Overarching Principles (OPs)

OP reference number:	OP
OP1	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 River Shannon and River Fergus Estuaries SPA.
OP2	As required under prevailing legislation, development proposals will be required to comply with the requirements of the Environmental Impact Assessment and Habitats Directives.
OP3	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.
OP4	All development proposals on the Moneypoint site will need to be evaluated to consider combined risks and potential consequences to the environment, given its SEVESO status. Development proposals will be supported by all relevant environmental assessments necessary to determine the acceptability of residual impacts on environmental receptors.
OP5	ESB will continue to operate and manage the site in-line with all consents – including planning permissions, environmental licences, waste licences etc, and in-line with relevant Regulations e.g. COMAH
OP6	<p>ESB will continue to operate within its Environmental Management System (EMS) which is externally accredited to the ISO 14001 Standard and provides a framework for ensuring that ESB complies with its legislative and regulatory obligations, while also providing assurance that it is managing its environmental risks in a proactive and responsible way.</p> <p>In-line with the EMS, construction based mitigation will be applied, as appropriate, to mitigate against impacts on the local environment. Construction Environmental Management Plans (CEMPs) will be prepared and implemented for any major construction/upgrade works. The CEMP will include, but not be limited to, the following information:</p> <ul style="list-style-type: none"> • Description of the project; • Description of the construction works required (including duration and phasing, location, sensitive receptors etc); • Details of any environmental assessments carried out to inform the CEMP; • Roles and responsibilities (including training and competencies); • Details on environmental management, including details of any environmental management systems, identification of the relevant regulations and requirements, environmental awareness and commitments; • Identification of potential negative environmental effects and mitigation measures to reduce or avoid said impacts (including mitigation measures relating to population and human health, biodiversity, land and soils, water, air and climate, archaeological, architectural and cultural heritage, landscape and visual, material assets (including infrastructure, waste and resources); and • Procedures for audits, monitoring and inspections.
OP7	Operational Phase Maintenance Plans will be developed where relevant for any major developments arising from the implementation of the Strategy.
OP8	The implementation of this Strategy will aim to protect, restore and enhance biodiversity and ecological connectivity. The design of any developments should aim, where practicable, to incorporate Biodiversity Net Gain.
OP9	Appropriate invasive species surveys shall be carried out in advance of any construction/reinstatement works and inform the implementation of Invasive Species Management Plans where required.

OP reference number:	OP
OP10	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.
OP11	Where proposed works have the potential to impact on the quality of a water body and / or the integrity of a European Site, a Surface Water Management Plan (SWMP) and / or a Water Protection Plan will be prepared and implemented.
OP12	In carrying out all works – and notably in undertaking works to brownfield lands, ESB will ensure that appropriate and adequate soil protection measures are undertaken where appropriate on any developments arising from the implementation of the Strategy. Adequate and appropriate investigations shall be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, particularly where brownfield development is proposed.
OP13	To develop and manage drainage systems on the site in-line with the principles of sustainable urban drainage. On-site systems will continue to be routinely inspected and maintained.
OP14	All waste arising during any development and continued operation of the site shall be managed and disposed of in accordance with relevant legislation. Waste management plans shall be implemented to minimise waste and ensure correct handling and disposal of construction wastes streams.
OP15	Implement recommendations of the Strategic Flood Risk Assessment of the Green Atlantic @ Moneypoint Concept including ensuring areas vulnerable to coastal inundation are reserved for ‘water compatible’ uses; ensuring that the finished floor level of new development is set above the 1 in 200-year coastal flood level, including allowance for climate change and freeboard (that being 4.39mOD) and that additional analysis – possibly including a wave overtopping analysis, is carried out to identify other mitigation measures that may be required.
OP16	As feasible, ESB will work with utility and service providers such as Eirgrid to accommodate the provision of strategic infrastructure at Moneypoint to serve the needs of the Shannon Estuary and wider region and to realise the potential of the offshore wind and renewable energy sector

Table 2.5 outlines mitigation measures specific to the GA Concept.

Table 2.5 Proposed Mitigation Measures

Environmental aspect	Mitigation measure	Relevant to which principle
P&HH	<p>No potential negative or uncertain impacts were identified for P&HH during the assessment of significant effects, other than potential temporary construction related impacts. Construction based mitigation has been detailed as follows.</p> <p>The IE Licence ensures all operations at the Moneypoint Generating Station site do not endanger human health or harm the environment.</p> <p>All works should be carried out in compliance with Construction Environmental Management Plans (CEMP). CEMPs shall be prepared for any major construction/upgrade works associated with the implementation of the GA Concept.</p> <p>The CEMP shall include, but not limited to, the following information:</p> <p>24. Description of the project;</p> <p>25. Description of the construction works required (including duration and phasing, location, sensitive receptors etc);</p> <p>26. Details of any environmental assessments carried out to inform the CEMP;</p> <p>27. Roles and responsibilities (including training and competencies);</p> <p>28. Details on environmental management, including details of any environmental management systems, identification of the relevant regulations and requirements, environmental awareness and commitments;</p> <p>29. Identification of potential negative environmental effects and mitigation measures to reduce or avoid said impacts (including mitigation measures relating to population and human health, biodiversity, land and soils, water, air and climate, archaeological, architectural and cultural heritage, landscape and visual, material assets (including infrastructure, waste and resources); and</p> <p>30. Procedures for audits, monitoring and inspections.</p> <p>Operational Phase Maintenance Plans should be developed where relevant for any major developments arising from the implementation of the GA Concept.</p> <p>Any developments arising from the implementation of the GA Concept adjoining the coastline must take cognisance of the visual and ecological sensitivity of the adjoining coastline, which includes the Lower River Shannon SAC (site code 0002165) and River Shannon and River Fergus Estuaries SPA.</p> <p>Lastly, any developments arising from the implementation of the GA Concept shall be subject to the relevant environmental assessments, as required (i.e. Environmental Impact Assessment, Environmental Impact Assessment Screening, Appropriate Assessment, Habitats Regulations Assessment).</p>	MEZ1, MEZ3, MEZ8, CIZ1, CIZ3, CIZ5, CIZ7, IEZ3, AMZ7, GDZ1, GDZ3, BZ4 and TAZ2.
BIO	<p>Biodiversity and Ecological Networks</p> <p>Any developments arising from the implementation of the GA Concept should aim to protect, restore and enhance biodiversity and ecological connectivity, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, geological and geomorphological systems, other landscape features, natural lighting conditions, and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping-stones in the context of Article 10 of the Habitats Directive.</p> <p>The design of any developments arising from the implementation of the GA Concept should aim to incorporate Biodiversity Net Gain where practicable.</p> <p>Any developments arising from the implementation of the GA Concept adjoining the coastline must take cognisance of the visual and ecological sensitivity of the adjoining coastline, which includes the Lower River Shannon SAC (site code 0002165) and River Shannon and River Fergus Estuaries SPA.</p>	MEZ1, MEZ3, MEZ7, MEZ8, MEZ9, CIZ1, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, IEZ7, AMZ6, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ3, BZ4, TAZ2, SZ1 and WZ2.

Environmental aspect	Mitigation measure	Relevant to which principle
	<p>Invasive Species</p> <p>Appropriate invasive species surveys shall be carried out in advance of any construction/reinstatement works. Invasive Species Management Plans shall be prepared and implemented where required, following the assessment of invasive species surveys.</p>	
	<p>Direct Land Take</p> <p>Where possible, the design of any developments arising from the implementation of the GA Concept will ensure that measures are explored to minimise unnecessary land-take, in line with the ecological mitigation hierarchy which prioritises avoidance, and seeks to reduce, mitigate, and then compensate and offset for adverse effects on biodiversity, in that order of preference. In particular, the WZ, GDZ, SZ and BZ which are predominantly greenfield and include woodland areas.</p> <p>If land-take cannot be avoided, an assessment of the type (and use) of habitat present is required to determine suitable mitigation measures.</p>	
	<p>Hydrological Change</p> <p>Where proposed work has the potential to result in hydrological change, and there is a European Site within the zone of influence e.g., the Shannon Estuary (designated SPA and SAC), then coastal process modelling will be undertaken to determine any potential hydrological change as a result of any proposed construction works which may impact on the hydrology of sites within the zone of influence of the implementation of the GA Concept, including European Sites designated for their international nature conservation importance. This will also help to inform the overall design of any infrastructure requirements.</p>	
	<p>Water Pollution</p> <p>Where proposed works has the potential to result in water pollution, and there is hydrological connectivity to a European Site e.g., the Shannon Estuary (designated SPA and SAC), Surface Water Management Plans (SWMPs) will be prepared and implemented during construction. SWMPs will include appropriate measures such as temporary silt fencing, cut off ditches, settlement ponds and bunds set up early in construction to capture runoff and prevent ingress of sediments and contaminants into existing drainage infrastructure where necessary.</p> <p>Where implementation of the principles presents a challenge to existing drainage systems, and/or the operation of a local drainage system is known to be complicated by interactions between river, groundwater and sewer systems or river and canal systems, submission of a Water Protection Plan and detailed site drainage plans will be required with planning applications associated with developments arising from the implementation of the GA Concept, if a European Site falls within the zone of influence.</p>	
	<p>Air Quality</p> <p>Where increased air pollution may result in adverse effects on habitats, potential solutions will be implemented to mitigate air pollution. This may include tree planting to reduce deposition of pollutants on a site (this is site and habitat dependent); preparation and implementation of dust management plans, screening and the provision of compensatory habitat (where practicable).</p>	
	<p>Noise, vibration, and visual disturbance</p> <p>Development proposals will provide evidence that the design does not result in increased noise, vibration, or visual disturbance to important ecological receptors within the zone of influence, in particular those that are QI/SCIs of European Sites e.g., the Shannon Estuary (designated SPA and SAC), to the degree that the noise/vibration/visual disturbance affects the integrity of the ecological receptor.</p>	
	<p>Lighting</p>	

Environmental aspect	Mitigation measure	Relevant to which principle
	Proposals arising from the implementation of the GA Concept will demonstrate, where relevant, that the design of lighting minimises the incidence of light spillage or pollution into the surrounding environment and that there is no unacceptable adverse effect on the integrity of European Sites (i.e. no unacceptable adverse effect on QIs/SCIs of European Sites) e.g., the Shannon Estuary (designated SPA and SAC).	
L&S	<p>Contamination</p> <p>Ensure that adequate soil protection measures are undertaken where appropriate on any developments arising from the implementation of the GA Concept. Adequate and appropriate investigations shall be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, particularly where brownfield development is proposed.</p>	MEZ1, MEZ3, MEZ6, MEZ7, MEZ8, MEZ9, CIZ1, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, IEZ7, AMZ5, AMZ6, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ3, BZ4, TAZ2, SZ1 and WZ2.
WAT	<p>Flood Risk Management Guidelines</p> <p>Any major developments resulting from the implementation of the GA Concept shall be subject to plan/project level flood risk assessments.</p>	MEZ1, MEZ3, MEZ6, MEZ7, MEZ8, MEZ9, CIZ1, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, IEZ7, AMZ5, AMZ6, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ3, BZ4, TAZ2, SZ1 and WZ2.
	<p>Sustainable Drainage Systems (SuDS)</p> <p>Any new developments associated with the implementation of the GA Concept should seek to tie into the existing SuDS on the site.</p>	
AQ, C&N	<p>Air</p> <p>Any developments arising from the implementation of the GA Concept should comply with the IE Licence requirements and contribute to achieving greenhouse gas emission targets.</p> <p>Dust management plans shall be prepared and implemented for any major construction/repurposing/upgrade works associated with the implementation of the GA Concept, particularly works related to the removal of ash from the ASA.</p>	MEZ1, MEZ3, MEZ8, MEZ9, CIZ1, CIZ2, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ7, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ2, BZ3, BZ4, TAZ2 and WZ2.
	<p>Climate adaptation and resilience</p> <p>Improve resilience and adaptation to climate change by taking into account issues including the following in the location and design of any developments/plans arising from the implementation of the GA Concept:</p> <p>31.Flood risk;</p> <p>32.Susceptibility to major accidents/disasters; and</p> <p>33.Extreme temperature.</p> <p>Any new projects arising from the implementation of GA Concept shall adhere to the COMAH Regulations (2015).</p>	
AA&CH	<p>Archaeological Heritage</p> <p>Where practicable, developments arising from the implementation of the GA Concept should protect archaeological heritage by implementing the relevant provisions of the Planning and Development Act 2000 (as amended), the National Monuments Act, 1930 (as amended), the Valetta Principles for the Safeguarding and Management of Historic Cities, Towns and Urban Areas and the Convention for the Protection of the Architectural Heritage of Europe (hereafter referred to as the Granada Convention) (Council of Europe 1985).</p>	ME1, MEZ3, MEZ8, MEZ9, CIZ1, CIZ2, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ3, IEZ7, AMZ7, GDZ1, GDZ2,

Environmental aspect	Mitigation measure	Relevant to which principle
	<p>Any changes to archaeological heritage resulting from any new developments, underground works, upgrades, or alterations to existing infrastructure arising from the implementation of the GA Concept, shall be in accordance with the relevant legislation.</p> <p>Consultation with the National Monuments Service of the Department of Housing, Local Government and Heritage should be carried out for any plans/projects resulting from the implementation of the GA Concept where impacts on protected sites are likely to arise.</p> <p>Any developments associated with the implementation of the GA Concept should contribute, where relevant, towards the protection and preservation of underwater archaeological sites in riverine, intertidal, and sub-tidal locations.</p>	GDZ3, BZ1, BZ2, BZ3, BZ4, TAZ2, SZ1 and WV2.
	<p>Architectural Heritage</p> <p>Where possible, developments arising from the implementation of the GA Concept should contribute towards the protection of architectural heritage by adhering to the relevant legislative provisions of the Planning and Development Act 2000 (as amended) in relation to architectural heritage and the policy guidance contained in the Architectural Heritage Protection Guidelines 2011 (and any updated/superseding documents).</p> <p>Any changes to surrounding architectural heritage or its curtilage, resulting from any new developments, underground works, upgrades or alterations to existing infrastructure resulting from the implementation of the GA Concept, shall be in compliance with relevant legislation.</p> <p>Any plans/projects arising from the implementation of the GA Concept will have regard to the National Inventory of Architectural Heritage (NIAH), Records of Protected Structures (RPS) and Sites and Monuments Record (SMR). Where possible developments arising from the implementation of the GA Concept should provide a buffer area around protected sites, structures and or monuments that will be maintained free from any new structures.</p> <p>Any plans/projects arising from the implementation of the GA Concept will have regard to aspects of heritage not fully covered by those held on formal records - e.g. the wealth of vernacular heritage.</p>	
	<p>Under Water Cultural/ Archaeological Heritage</p> <p>Where any development arising from the implementation of the GA Concept has the potential to result in negative effects on underwater cultural heritage, a programme of pre-development underwater archaeological impact assessment should be scoped into the design process as soon as is practicable. The underwater archaeological impact assessment should be carried out at the earliest possible stage to facilitate the embedding of any recommended further mitigation within the detailed design for the project, as necessary, in order to ensure the preservation in-situ of any identified/potential underwater cultural heritage and to develop an informed archaeological strategy to be implemented in agreement with the Department co-ordinated by the Development Applications Unit (DAU) of the DHLGH.</p> <p>Any development in the marine environment at Moneypoint has the potential to disturb undiscovered underwater cultural heritage. The collection and interpretation of side-scan sonar and bathymetry information by qualified archaeologists as part of any future development projects will minimise any impacts or the possibility of destruction of underwater and undiscovered heritage features in areas of heritage potential.</p>	
L&V	<p>Developments and plans arising from the implementation of the GA Concept should contribute, where possible, towards the protection of county and local level landscape designations from incompatible developments. Any developments which may arise from the implementation of the GA Concept that have the potential to result in negative effects on these designations shall be accompanied by an assessment of the potential landscape and visual impacts of any such development. This will demonstrate that potential landscape effects have been anticipated and avoided to a level consistent with the sensitivity of the landscape and the nature of the designation.</p> <p>Protect amenity value and minimise negative effects on amenity value resulting from any new developments, underground works, upgrades, or alterations to existing infrastructure arising from the implementation of the GA Concept.</p>	MEZ1, MEZ3, MEZ8, MEZ9, CIZ1, CIZ2, CIZ3, CIZ5, CIZ7, IEZ2, IEZ3, IEZ5, AMZ7, GDZ1, GDZ3, BZ4 and TAZ2.

Environmental aspect	Mitigation measure	Relevant to which principle
	<p>Any developments arising from the implementation of the GA Concept should protect the landscape character and visual potential of the coast and conserve the character and quality of seascapes.</p> <p>Any developments arising from the implementation of the GA Concept adjoining the coastline must take cognisance of the visual and ecological sensitivity of the adjoining coastline, which includes the Lower River Shannon SAC (site code 0002165) and River Shannon and River Fergus Estuaries SPA.</p> <p>Cognisance shall be given to the information and recommendations contained in the Landscape Strategy for Ireland 2015-2025 and Section 14.2.1 of CCDP (Landscape Character Assessment of County Clare) during the development of any projects and plans arising from the implementation of the GA Concept.</p> <p>Any future plans/programmes arising from the implementation of the GA Concept will have regard to existing and new landscape guidance documents.</p>	
MA	<p>Resources and Waste</p> <p>All waste arising during any construction or upgrade works arising from the implementation of the GA Concept shall be managed and disposed of in accordance with relevant legislation. Waste management plans shall be implemented to minimise waste and ensure correct handling and disposal of construction wastes streams.</p> <p>Where possible ensure that the principles of reduce, reuse and recycle are implemented on any developments arising from the implementation of the GA Concept.</p> <p>Land-Use and Infrastructure</p> <p>Any developments arising from the implementation of the GA Concept should protect public assets and infrastructure including services and utility infrastructure (electricity, gas, telecommunications, water supply, wastewater infrastructure etc).</p> <p>Aquaculture</p> <p>Any development likely to occur in the CIZ must include an assessment of impacts on aquaculture in Shannon Estuary.</p>	MEZ1, MEZ3, MEZ6, MEZ7, MEZ8, MEZ9, CIZ1, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, IEZ7, AMZ4, AMZ5, AMZ6, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ2, BZ3, BZ4, TAZ2, SZ1 and WZ2.
All	<p>All works should be carried out in compliance with Construction Environmental Management Plans (CEMP). CEMPs shall be prepared for any major construction/upgrade works associated with the implementation of the GA Concept.</p> <p>The CEMP shall include, but not limited to, the following information:</p> <p>34. Description of the project;</p> <p>35. Description of the construction works required (including duration and phasing, location, sensitive receptors etc);</p> <p>36. Details of any environmental assessments carried out to inform the CEMP;</p> <p>37. Roles and responsibilities (including training and competencies);</p> <p>38. Details on environmental management, including details of any environmental management systems, identification of the relevant regulations and requirements, environmental awareness and commitments;</p> <p>39. Identification of potential negative environmental effects and mitigation measures to reduce or avoid said impacts (including mitigation measures relating to population and human health, biodiversity, land and soils, water, air and climate, archaeological, architectural and cultural heritage, landscape and visual, material assets (including infrastructure, waste and resources); and</p> <p>40. Procedures for audits, monitoring and inspections.</p>	MEZ1, MEZ3, MEZ8, MEZ9, CIZ1, CIZ3, CIZ4, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, IEZ7, AMZ6, AMZ7, GDZ1, GDZ3, BZ1, BZ4, TAZ2 and WZ2.

Environmental aspect	Mitigation measure	Relevant to which principle
All	Operational Phase Maintenance Plans should be developed where relevant for any major developments arising from the implementation of the GA Concept.	MEZ1, MEZ3, MEZ8, MEZ9, CIZ1, CIZ3, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, AMZ6, AMZ7, GDZ1, GDZ3, BZ1, BZ4, TAZ2 and WZ2.
All	Any developments arising from the implementation of the GA Concept shall be subject to the relevant environmental assessments, as required (i.e. Environmental Impact Assessment, Environmental Impact Assessment Screening, Appropriate Assessment, Habitats Regulations Assessment).	All.
All	The ESB shall 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.	All.

2.9 SEA Monitoring Measures

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the Plan or Programme.

A monitoring programme is developed based on the indicators selected to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured. As previously described, the environmental indicators have been developed to show changes that would be attributable to implementation of the GA Concept.

As outlined in the EPA guidance document ‘*Guidance on SEA Statements and Monitoring*’ (EPA, 2023), SEA monitoring should reflect the nature and level of detail of the Plan/Programme (EPA, 2023)⁴. Many national-level Plans/Programmes lack geographic specificity, contain only high-level strategic objectives, and do not lend themselves to cause–effect models in terms of direct measuring of environmental effects. As such, SEA monitoring for these Plans should focus on national indicators to examine environmental trends.

2.9.1 SEA Monitoring

Refer to Table 2.6 for the proposed monitoring measures. The monitoring measures included are based on national indicators and informed by the content of the GA Concept.

The SEA carried out has ensured that any potential significant environmental impacts have been identified and given due consideration.

⁴ EPA (2023) Guidance on SEA Statements and Monitoring. Available at: [Strategic Environmental Assessment | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications-and-resources/publications/strategic-environmental-assessment)

Table 2.6 Proposed monitoring measures for the GA Concept

Environmental Component	Likely Significant Environmental Effects Identified	Potential Cumulative Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
P&HH	No definitive likely negative effects on P&HH have been identified, predominantly neutral and positive impacts were identified as likely to occur for P&HH for the purposes of this assessment.	<p>Potential for cumulative positive effects on communities and/or individuals to occur as a result of additional and improved electricity supply and security resulting from the implementation of the GA Concept, in combination with the investment and policies emanating from a number of plans outlined in Appendix A.2.</p> <p>Potential for cumulative negative effects on communities and/or individuals to occur as a result of any construction/development associated with the implementation of the GA Concept, particularly in combination with any construction/ development planned for any relevant LAP's/CDP's or energy policies and strategies which will involve physical works.</p> <p>All such plans will however be subject to SEA in line with the SEA Directive (2001/42/EC) and AA as necessary, in line with</p>	<p>Perceived health of the local community.</p> <p>Number of site-related accidents/incidents reported.</p> <p>Number of complaints received pertaining to disturbance or pollution.</p> <p>Direct and indirect employment created by ESB/ORE Developers utilising the Moneypoint Generating Station Hub.</p> <p>Provision of improved low-carbon electricity supply and security across Ireland.</p>	<p>CSO Census Reports – Health and Population Statistics.</p> <p>EPA IE Licence/ ESB AER.</p> <p>EPA Licence/ ESB AER.</p> <p>CSO Census Reports – Population and Employment Statistics.</p> <p>DECC's Energy Security Packages.</p>	<p>CSO, every 6 years.</p> <p>EPA, continuously/ annually and ESB annually.</p> <p>EPA, continuously/ annually and ESB annually.</p> <p>CSO, every 6 years.</p> <p>Government of Ireland's Energy Security Group, after 2030 implementation will be monitored every 5 years.</p>

		Article 6 of the Council Directive 92/43/EEC.			
BIO	<p>Principles in the GA Concept have been identified as having potential to result in negative effects on BIO during the construction of and or any development that has potential to occur across the Moneypoint Generating Station site, e.g., ESB will seek to develop and enhance coastal infrastructure at the Moneypoint Generating Station site to facilitate its development as a hub for the ORE industry. It is expected that new infrastructure will be required for the delivery of turbine elements, deployment of substructures, assembly of turbines and limited storage, at the quayside. This may require the development of new quayside infrastructure including infilling/ land reclamation.</p> <p>A range of principles have also been identified, for the purposes of this assessment, as having the potential to result in ‘uncertain’ effects on BIO.</p> <p>This means that in the worst-case scenario there is potential for further negative environmental effects to occur. The SEA monitoring</p>	<p>Potential for cumulative negative effects on BIO to occur as a result of increased development, associated construction works and potential land-use change emanating from the implementation of the GA Concept in combination with the increased development, land-use change and associated development emanating in line with any relevant LAP’s/CDP’s and any other plans which may affect areas in close proximity to developments arising from the implementation of the GA Concept.</p> <p>All such plans will however be subject to SEA in line with the SEA Directive (2001/42/EC) and AA as necessary, in line with Article 6 of the Council Directive 92/43/EEC.</p>	<p>Presence and status of existing biodiversity on site.</p> <p>Level of biodiversity gain achieved as a result of the implementation of the GA Concept.</p> <p>Number and condition of Natura 2000 network, European sites in or along the Moneypoint Generating Station site boundary, as per Article 17 Reports, and the maintenance of conservation objectives.</p> <p>As follows:</p> <p>Level of biodiversity lost as a result of the implementation of the GA Concept.</p> <p>Number of incident responses onsite e.g., invasive species (for example, Japanese Knotweed).</p>	<p>As follows:</p> <p>Monitoring related to the GA Concept – habitat mapping and ecological assessments/surveys carried out for any developments arising from the implementation of the GA Concept; and</p> <p>Monitoring related to relevant Local Area Plans and County/City Development Plans.</p> <p>Achievement of the Objectives of the Clare’s Biodiversity Action Plan.</p> <p>The Status of EU Protected Habitats and Species in Ireland Article 17 Report (Department of Housing, Local Government and Heritage).</p> <p>As follows:</p> <p>Monitoring of the effects of any project development required under separate processes (EIA, AA)</p> <p>Updates to National Red List Check List</p> <p>Inland Fisheries Ireland – Protected Freshwater Species – Atlantic Salmon etc. – trends in protected</p>	<p>As follows:</p> <p>ESB, continually; and</p> <p>Local Authorities, continuously.</p> <p>CCC, every 6 years.</p> <p>DHLGH, every 6 years.</p> <p>As follows:</p> <p>In accordance with the monitoring provisions of EIA/AA</p> <p>NPWS, varies</p> <p>Inland Fisheries Ireland, varies</p> <p>Birdwatch Ireland, every 6 years; and</p> <p>ESB, continually.</p>

	measures outlined have been developed to also take these potential negative effects into account.			<p>freshwater species, population, distribution, health etc.</p> <p>Birds of Conservation Concern Ireland – Monitoring by Birdwatch Ireland on status, distribution, population etc.; and</p> <p>Monitoring related to the GA Concept such as: Monitoring of onsite vegetative health and condition to detect and mitigate against the potential impact of pests and diseases.</p>	
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2.9.2 Monitoring associated with EPA Licence

As previously discussed, Moneypoint Generating Station is licenced by the EPA under an IE Licence (Ref. P0605-04). Moneypoint Generating Station's IE Licence requires that activities onsite do not cause environmental nuisance such as odour, dust, or noise and the IE Licence contains conditions on how the site must operate in order to protect the environment from pollution that might otherwise arise.

In line with the IE Licence, environmental monitoring of emissions from the site is on-going. Throughout its operation, Moneypoint Generating Station has been maintained and improved to meet relevant environmental standards, and the IE Licence reviewed as appropriate. It is noted that the Moneypoint Generating Station IE Licence (Ref. P0605-04) includes a range of monitoring measures all of which must be complied with and reported upon annually.

A list of the environmental components monitored under the IE License is listed as follows.

1. Emissions to Air;
2. Emissions to Water;
3. Emissions to Sewer;
4. Waste Monitoring;
5. Noise Monitoring;
6. Ambient Monitoring;
7. Groundwater Monitoring; and
8. Soil Monitoring.

Refer to the Moneypoint Generating Station's IE Licence⁵ (EPA, 2017) for full details of the specified monitoring measures.

⁵ EPA (2017) INDUSTRIAL EMISSIONS LICENCE PO605-04. Available at: [01fae198-c68a-43ea-ba65-f236572fc175.pdf](https://www.epa.ie/licences/licence/P0605-04/01fae198-c68a-43ea-ba65-f236572fc175.pdf)

3. AA

Stage 1 AA (Screening) was undertaken by Arup to identify if the potential for effects of implementing the GA Concept on the conservation status of designated Natura 2000 sites within the sphere of influence of the plan (or project). It was determined as part of this screening that there was potential for significant effects and/or in-combination effects on European sites as a result of implementing the GA Concept. A combined AA Screening and NIS was subsequently prepared.

This Report documented a range of proposed measures which aim to mitigate against any adverse effects arising from the implementation of the GA Concept.

4. SFRA

A Stage 1 SFRA Screening was undertaken by Arup to carry out Flood Risk Identification for the site. A Stage 2 SFRA Report was then undertaken to carry out an initial Flood Risk Assessment for the potential effects of implementing the GA Concept.

The SFRA Report documented a range of proposed measures which aim to mitigate against any adverse effects arising from the implementation of the GA Concept.

5. Final Appraisal: How Environmental Considerations were integrated into the GA Concept

This Section summarises how environmental considerations were integrated into the adopted GA Concept, throughout the SEA process.

The SEA process for the GA Concept ensured the integration of environmental considerations as follows:

- Undertaking the SEA in parallel with the GA Concept;
- Undertaking the SEA with close regular contact between the ESB and the SEA team;
- Issuing the Scoping Report to the Environmental Authorities for comments on key environmental issues and the proposed scope of the SEA at the earliest possible stage of the GA Concept preparation; and
- Carrying out a full assessment of the environmental effects of the GA Concept and recommending and making changes to the GA Concept as a result. The GA Concept has incorporated Overarching Principles as mitigation measures, directly adopting recommendations from the environmental assessment to ensure best practice in environmental management. Refer to Appendix A.5 for details of the recommendations Arup made to ESB during the SEA process.

Identification of environmental constraints

As described in Section 2.4, the SEA team undertook an assessment of baseline environmental conditions of the GA Concept area, with reference to biodiversity, population and human health, land and soil, water, air and climate (including noise), heritage, landscape, and material assets. This information was used to focus the SEA objectives, develop alternatives, and assess positive and negative impacts associated with the implementation of the proposed GA Concept. An Environmental Sensitivity Map was prepared to enable this assessment and to influence alternatives discussions and assessment of policies.

The GA Concept and SEA ER took into account the most up to date data which included but is not limited to, findings of the EPA Ireland's National Inventory Report 2022 (EPA, 2022), EPA Water Quality in 2022 Report (EPA, 2022) and the latest CSO data (CSO, 2022) which were integrated into the SEA ER.

Furthermore, a site visit was undertaken on March 25th, 2024, where both Arup (including SEA, AA and SFRA team members) and ESB were in attendance. ESB gave Arup a guided tour of the Moneypoint Generating Station site, in particular the areas that were considered to be of environmental and/or flooding concern during the environmental assessment processes. The information obtained during the site visit was used to inform the final versions of environmental assessments (SEA, AA and SFRA).

SEA Scoping

As described in Section 2.3, the SEA Scoping was a key part of the assessment process as it provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

Refer to Appendix A.1 for the submissions received during the scoping consultation and how they were responded to and incorporated into the SEA ER and GA Concept.

Assessment of alternatives

The SEA team worked with ESB from the outset to assist ESB in becoming familiar with the process. The SEA team issued ESB the EPA Guidance on Developing and Assessing Alternatives in SEA, as well as some examples from similar plans in the public domain.

The SEA Directive requires the SEA ER to consider “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”. The consideration of these alternatives is done so in three stages within the SEA ER:

6. Identify reasonable alternatives
7. Evaluate and compare the alternatives
8. Provide reasons for the choice of preferred alternative(s).

ESB identified and compiled the four reasonable alternatives that were considered during the preparation of the GA Concept. Arup assessed, evaluated and compared these alternatives as part of the SEA ER. From an environmental perspective, the emerging preferred scenarios were Alternative D - Green Atlantic Strategy Concept 3 and Alternative E - Green Atlantic Strategy Concept 4. However, in terms of overall preferred Scenario from a plan development perspective, Alternative E - GA Concept Concept 4 was chosen.

Refer to Section 2.5.3 of this report or Section 7 of the SEA ER for details on the consideration of alternatives.

Plan Principles

The SEA/AA/SFRA team worked closely with ESB to develop the GA Concept. Through meetings, multi-disciplinary discussions, the SEA/AA/SFRA team were able to aid the plan development process and provide recommendations throughout each stage of the plan development process.

In total, three drafts of the SEA ER were issued to ESB during the SEA process, the first draft included a number of recommendations of the SEA, for the consideration of ESB to incorporate into the draft GA Concept.

One notable aspect of the GA Concept is the direct integration of Overarching Principles (OPs) into the plan, which function as SEA mitigation measures and reflect recommendations from the environmental assessment of the draft GA Strategy. The ESB has given these recommendations careful consideration and formally adopted them into the Concept Strategy, demonstrating adherence to best practices in environmental due diligence.

Some examples of OPs related to the appropriate environmental assessments being undertaken, having due regard to ecological, visual and flooding sensitivities in the area, amongst others, refer to **Table 2.4** for the

full list of OPs incorporated into the GA Concept. ESB incorporated OPs from the SEA, AA and SFRA processes into the draft GA Concept.

Following the SEA, AA and SFRA process, and adoption of the GA Concept as appropriate, it is intended that the GA Concept and inclusive Concept Strategy will be used to support individual development proposals and planning applications on the Moneypoint lands. In all cases, development proposals will be subject of the appropriate consents and environmental assessment.

Proposed mitigation measures

Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. A number of proposed principles were identified as potentially resulting in a significant negative environmental impact, for example onshore development is likely to take place at the Moneypoint Generating Station site and ORE developments in the maritime area, where any developments are likely to occur on or offshore, there is potential for negative environmental impacts. Thus, potential for negative impacts have been identified for BIO, L&S, WAT and L&S in all principles that relate to development. It was noted throughout the assessments that, where development will be taking place in zones of greenfield sites, larger negative impacts are likely to occur for environmental components, than that of a brownfield site.

The SEA team worked closely with ESB in the development of the mitigation measures outlined in the SEA ER in order to fully mitigation potential environmental effects.

Required environmental monitoring programme

A monitoring programme has been developed based on the indicators (noted in Section 9 of the SEA ER) in order to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

The indicators have been developed to illustrate changes that may be attributable to the implementation of the GA Concept.

Consultation

Further to the SEA Scoping consultation, the SEA ER, the combined Screening for AA and NIS, SFRA and the GA Concept were put on wider display on ESB's website. A total of six No. of submissions were received as part of the consultation.

Appendix A.2 of this report sets out each of the submissions received from public bodies, as they relate to SEA only, and describes how these submissions were taken into account. In the interest of the General Data Protection Regulation (GDPR), the full submissions from members of the general public are not contained in Appendix A.2 but have nevertheless been taken into consideration.

Following the submissions made by the public to the GA Concept and SEA ER, minor updates have been made to the GA Concept that are not considered material and do not change the outcome to the SEA ER. In addition, a number of changes were proposed by the AA process to the GA Concept, these are considered to have a positive impact on the environment and do not require further consideration.

A.1 Submissions Received from Statutory Consultees during the SEA Scoping Consultation period

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
EPA	<p>9. Licence review considerations:</p> <p>a. You should consider whether the proposals for the development of the Strategy area will require a review of the existing licences at the Moneypoint site.</p>	Noted. This comment is for the consideration of the ESB, where development emanates from the draft GA Concept
	<p>10.Integration of SEA and the draft Strategy:</p> <p>a. The integration of the SEA process into the Strategy should reflect the overall objective of the SEA Directive “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”.</p> <p>b. All recommendations from the SEA, including mitigation measures, should be integrated into the Strategy. Fully integrating the findings and recommendations of the SEA into the Strategy will be key to strengthening the overall purpose of the Strategy while ensuring that any significant adverse effects of implementing the Strategy are suitably mitigated.</p> <p>c. The SEA Environmental Report should include a section outlining how the recommendations and mitigation measures from the SEA, and any other environmental assessments, have been incorporated into the Strategy. We recommend that, the SEA Environmental Report includes summary tables outlining the key findings of the SEA and where relevant the SFRA and AA, and linking the significant environmental effects identified to the proposed mitigation measures and environmental monitoring programme.</p>	<p>This comment is welcomed. SEA has been undertaken in an iterative manner with regard to the draft GA Concept development, AA and SFRA reporting. The SEA process has been integrated into the draft GA Concept to reflect the overall objective of the SEA Directive.</p> <p>Recommendations and mitigation measures of SEA have been integrated into the draft GA Concept, in so far as possible. Key findings of the SEA and the linking of significant environmental effects identified to the proposed mitigation measures, monitoring measures and recommendations have been considered and included, as appropriate.</p>
	<p>11.Consideration of Alternatives:</p> <p>a. We suggest that the consideration of alternatives for the Strategy should be reviewed, and take into account the EPA’s Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015).</p>	Alternatives for the draft GA Concept have since been reviewed, updated, and incorporated into the SEA ER (Section 7). The EPA’ s Developing and Assessing Alternatives in Strategic Environmental Assessment guidance was reviewed in doing so.
	<p>12.Assessment of the potential for likely significant effects:</p> <p>a. While the SEA provides information on the area covered by the Strategy, the SEA could highlight the zone of influence of the Strategy, outside of the Strategy area as shown in Figure 1. This will help ensure that the potential for cumulative effects, associated with developments arising from implementing the Strategy, are considered.</p>	Noted. Section 5 of the SEA ER (Current State of the Environment) takes all the surrounding and onsite environmental components into consideration. The assessments included in Section 8 of the report (assessment of significant effects) take all baseline information included in Section 5 into account. Refer to the combined AA Screening and NIS for details of the Zone of Influence (ZoI) relevant to the draft GA Concept.

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>13. Monitoring, Implementation & Reporting:</p> <ol style="list-style-type: none"> Article 10 of the SEA Directive (2001/42/EC) requires that the significant environmental effects of implementing a plan are monitored in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action. The SEA environmental report must include a description of the measures envisaged concerning monitoring. The Strategy should include a commitment to implement this SEA-related environmental monitoring requirements and the associated reporting. We refer you to the EPA guidance on SEA Statements and Monitoring, (https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/guidance-on-sea-statements-and-monitoring.php), and would draw your attention to the useful high-level monitoring indicators proposed in Table 1 on page 31. The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any unforeseen environmental issues that may arise. The SEA Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. 	<p>Section 9 of the SEA ER contains information on Monitoring and Reporting and includes a detailed monitoring table which states monitoring frequency, responsibilities, and provisions for reporting in relation to the draft GA Concept.</p> <p>Statement of commitment to monitoring is for the consideration of ESB.</p> <p>The EPA guidance document has been reviewed and taken into consideration in Section 9 of the ER.</p> <p>Monitoring included in Section 9 of the ER addresses positive, negative, neutral, uncertain, and cumulative effects, as appropriate.</p>
	<p>14. Environmental Authorities:</p> <ol style="list-style-type: none"> The SEA Regulations require that the plan maker to consult with the designated environmental authorities. These include: Environmental Protection Agency; Minister for Housing, Local Government and Heritage; Minister for Environment, Climate and Communications; Minister for Agriculture, Food and the Marine. An list of the designated SEA environmental authorities is maintained on www.gov.ie at: https://www.gov.ie/en/publication/3539d-strategic-environmental-assessmentsea/#environmental-authorities-contact-details 	<p>The relevant authorities have been consulted with as part of the SEA Scoping process, and the SEA ER will be put on public display alongside the draft GA Concept.</p>
	<p>15.Q1. Are there any other relevant International, National or Regional Plans or Programmes that should be considered?</p> <ol style="list-style-type: none"> Section Error! Reference source not found. – Relationship with other relevant plans, programmes and legislation In Subsection Error! Reference source not found. (European Union Policy) include reference to the EU Climate Law and the EU Nature Restoration Law. In Subsection Error! Reference source not found. (National Policy) include a reference to the recently published National Biodiversity Action Plan, 	<p>Section 3 of the SEA ER has since been updated to make reference to the EU Climate Law, the EU Nature Restoration Law, National Biodiversity Action Plan, Limerick Shannon Metropolitan Area Transport Strategy, the Clare Local Authority Climate Action Plan and the current Grid 25 Implementation Strategy. Footnotes have been included as appropriate to detail the status of Plans.</p> <p>The SEA and AA processes have been undertaken as an iterative process, both of which have also informed and fed into the preparation of the draft GA Strategy throughout its development. Any development likely to occur as a result of the draft GA Concept must be subject to</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>d. In Subsection 3.2.21 (page 12), it is worth noting that the Climate Action Plan 2024 is still currently ongoing and SEA is being undertaken.</p> <p>e. Subsection 3.2.5.1 (Plans and Policies for the Shannon Region), consider also acknowledging the Limerick Shannon Metropolitan Area Transport Strategy, the Clare Local Authority Climate Action Plan and the current Grid 25 Implementation Strategy. We note the reference to the Shannon Integrated Framework Plan, being re-published recently. It would be useful to confirm the status of the SIPP.</p> <p>f. On page 15, we note the proposals to consider a concept masterplan for development. Where this may involve the zoning and development of lands, you should take into account the SEA and Habitats and Birds directives requirements, as appropriate and relevant. We also note that proposals for provision of wastewater treatment must be considered. This should be carried out in consultation with Uisce Eireann and relevant authorisations should be in place?.</p> <p>g. In 3.2.6 (Plans and policies for County Clare) , in Figure 2 (key policy, plans and programmes and interaction with the draft GA Strategy) the Maritime Planning Framework could also be included. In relation to some site-specific plans described, it would be useful to confirm the status of the management plan for the Lower River Shannon SAC. Additionally, where reference is made to ‘threat response plans’, this should include reference to the habitats or species they relate to.</p>	<p>appropriate environmental assessments, particularly where they may affect European Sites. Further for the consideration of the ESB.</p> <p>These comments are welcomed, Section 3.1 (Figure 1) of the ER has been updated to reflect the suggested plans and frameworks.</p>
	<p>16.Q2. Are there any additional environmental sensitivities or changes in weightings that should be included in the sensitivity mapping?</p> <p>a. In Section Error! Reference source not found. Sensitivity Mapping, given the importance of the need to protect good and high-status waters, we suggest that a weighting of 10 be considered for these areas also. This should cover rivers, transitional / estuarine areas and lakes.</p> <p>b. We also suggest you consider relative bird usage mapping information (prepared in conjunction with the implementation of the SIFP) that may be useful in preparing the sensitivity map and in developing, assessing and operating the Strategy. This should help minimise conflicts between operations, arising from the Strategy and important areas for birds within the Shannon estuary.</p>	<p>These comments are welcomed. The ESM included in Figure A16 of Appendix A.1 has since been updated to reflect these comments, as appropriate.</p>
	<p>17.Q3. Are there any other significant environmental issues that should be considered?</p> <p>a. In Section Error! Reference source not found. – Environmental Baseline and Key Environmental Issues and Opportunities, it would be helpful in Figure 3, to also include information on the zone of influence of the Strategy. This would help identify additional environmental issues to be considered.</p> <p>b. In Subsection 4.6.1, the legend and text of figure 8 (Habitat Map) should be made clearer.</p>	<p>Refer to the combined AA Screening and NIS for details of the Zone of Influence (ZoI) relevant to the draft GA Concept.</p> <p>Figure 3 (Section 5) - Habitat Map has been updated and enlarged in the SEA ER.</p> <p>Overall, Section 5 of the SEA ER has been updated to reflect these comments, as appropriate.</p> <p>Mitigation in Section 9 of the SEA ER has been incorporated to reflect the areas of construction and operation, lighting, invasive</p>

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	<p>c. The need to consider potential impacts on marine mammals and fisheries during construction and operation should also be considered.</p> <p>d. The extent to which lighting considerations have been taken into account could also be clarified. This may be important when considering impacts on birds or bats for example.</p> <p>e. In subsection 4.3.2 (key issues and opportunities), in bullet point 4, it would be helpful to describe the type of habitats that are assessed as being sensitive to atmospheric emissions.</p> <p>f. In subsection Error! Reference source not found. – Land and Soils, we note on page 26, that the previously approved FGD landfill ‘B’ will not be developed. Clarify whether this will not be developed over the lifetime of the Strategy or not developed at all.</p> <p>g. In subsection 4.4.2 (key issues and opportunities), with regards considering the use of imported soil material, the take into account the need to control the spread of invasive species, such as for instance Japanese knotweed.</p> <p>h. In subsection 4.5.1.3 (coastal flood risk), there may be merit in considering a strategic flood risk assessment for the Strategy area, if not already being undertaken, to ensure that operations / developments are appropriately protected and sited over the lifetime of the Strategy.</p> <p>i. In subsection 4.6.1.2 (Noise), where more up to date noise mapping information is available, this should be taken into account. Including a map showing the Strategy area and some key adjacent sources of noise such as Limerick City or Shannon Airport for example would be helpful.</p>	<p>species. Refer to the mitigation measures outlined in the combined Screening for AA and NIS for further mitigation related to habitats and species. Any development that is likely to occur as a result of the draft GA Concept must be subject to appropriate environmental assessments, particularly where they may affect European Sites.</p> <p>SFRA was undertaken in parallel with the SEA and AA of the draft GA Concept. Refer to the SFRA Report for further information.</p> <p>At the time of writing this report the most recent AER published was the 2024 report.</p>
	<p>18.Q4. Are there any environmental issues that should be scoped out of the SEA at this stage?</p> <p>a. The Scoping report appears to take account of the key environmental issues.</p>	<p>This comment is welcomed.</p>
	<p>19.Q5. Do you have any comments regarding the draft SEA environmental objectives, targets, or indicators?</p> <p>a. In Section Error! Reference source not found. – Environmental Objectives, Indicators and Targets, Table 5 – SEA Objectives, Indicators and Targets , is noted. We provide some comments below on some of the elements included in this table.</p> <p>b. Biodiversity, Flora and Fauna: we suggest that objective 2 could be amended to “Support the To achievement of the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation.” In the associated indicator (indicator 4), consider amending “Level of biodiversity change lost as a result of the implementation of the draft GA Concept”.</p> <p>c. Water: The target 1 (waters within the Moneypoint area), could be improved by referencing the Strategy area. Indicator 4 could also be amended to “instances of flooding in the Strategy area”.</p> <p>d. Material Assets: Indicator 2 could be amended to refer to “Records of local service disruption events”</p>	<p>These comments are welcomed. Section 6 of the SER ER has been updated to reflect these comments.</p>

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	<p>20. Section Error! Reference source not found. – Introduction:</p> <ol style="list-style-type: none"> There is merit in clarifying whether the area covered by the Strategy, includes the cased facility lands or whether additional lands are proposed for development of the Strategy. There is also merit in clarifying whether the development/re-development of lands associated with the Strategy will require a review of the existing EPA licence. + In subsection 1.2.3 (SEA Guidance), we refer you to the suite of EPA guidance available on our website, to consider as appropriate in preparing the SEA and the Strategy. These resources are available at: https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/. Section 1.4.2 (SFRA Process) and 1.4.3 (SFRA Report) could also refer to and consider the Regional SFRA for the Southern Regional Spatial and Economic Strategy. Additionally, the Flood Risk Management Plan for the Lower Shannon (OPW), should also be considered, as appropriate. 	<p>Figure 2.4 of this SEA ER has been updated to display the extent of draft GA Strategy's site boundary. Both the onshore area and ESB's privately held foreshore are included within the site boundary. Furthermore, refer to the mitigation measures included in Section 9 of the SEA ER and refer the mitigation as outlined in the combined Screening for AA and NIS.</p> <p>Noted. This comment is for the consideration of the ESB, whether the proposals for the development of the Strategy area will require a review of the existing licences at the Moneypoint Generating Station site should be taken into consideration.</p> <p>All suggested resources are welcome, have been reviewed and incorporated into the SEA ER, as appropriate.</p> <p>Refer to the SFRA report for full flood risk details.</p>
	<p>21. Section Error! Reference source not found. – draft GA Strategy:</p> <ol style="list-style-type: none"> In Section Error! Reference source not found. – Graft GA Overview, in relation to the third bullet point on page 8, it would be useful to describe where this alternative fuel facility may be located. The nature and extent of areas proposed for redevelopment should be highlighted, described and assessed in the SEA. In Figure 1 – The Green Atlantic @ Moneypoint Concept Strategy Source (page 9), it would be useful to review the colour scheme used for the different zones and figure legend to help differentiate more clearly the different areas set out. In subsection Error! Reference source not found., we note the ESB current holding covering both onshore and foreshore areas. Clarify whether both the onshore and foreshore areas are covered by the Strategy. Subsection Error! Reference source not found. – we note the intention for the Strategy duration to be for between 10 and 15 years. We suggest 15 years would be an appropriate timeframe, with reviews of the Strategy occurring at 5-year intervals. We note in subsection 2.6 – High level alternatives considered for the draft GA Strategy., that only two alternatives are currently proposed. We suggest that the consideration of alternatives take account of the EPA Guidance on developing and assessing alternatives in SEA (EPA, 2015). Additional elements to consider temporal elements such as phasing of development of the area, or location/zoning specific alternatives to consider aspects such as the extent of lands are proposed for different development options etc. 	<p>Section 2 of the SEA ER has been updated to reflect these comments, as appropriate.</p> <p>The nature and extent of areas proposed for redevelopment have been highlighted, described and assessed in the SEA, as appropriate. Refer to Section 8 of the SEA ER.</p> <p>Figure 1 of the SEA Scoping Report has been included in Figure 2.1 in Section 2 of the SEA ER, refer to the draft GA Concept for full details of these zones. Brief descriptions for each zone have been included in Table 8.2 (Section 8) of the SEA ER.</p> <p>Figure 2.4 of the SEA ER has been updated to display the extent of draft GA Concept's site boundary. Both the onshore area and ESB's privately held foreshore are included within the site boundary.</p> <p>Refer to mitigation measures included in Section 9 of the SEA ER and refer to mitigation as included in the combined Screening for AA and NIS.</p> <p>draft GA Concept timeframe and review period as detailed in this comment are for the consideration of ESB.</p> <p>EPA Guidance on developing and assessing alternatives in SEA (EPA, 2015) has been reviewed by both the ESB and Arup. Updated alternatives have been included as appropriate and assessed as part of this SEA ER (refer to Section 7 of the SEA ER).</p>
	<p>22. Scope of the SEA:</p> <ol style="list-style-type: none"> The Strategy should clearly set out the scope, remit and implementation related elements of the Strategy. 	<p>For the consideration of ESB. Section 3 of this SEA ER describes the draft GA Concept's Relationship with Other Relevant</p>

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	<p>Where it is envisaged that measures proposed in the Strategy will be implemented via other plans, which themselves have been or will be subject to SEA, this should be explained in the Environmental Report and taken into account in the assessment.</p> <p>b. Where specific measures will be implemented directly as part of the Strategy, further detail should be provided in the Environmental Report and Strategy on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate. There may be merit in exploring this issue further with the relevant environmental authorities during the Strategy preparation and SEA processes.</p> <p>c. There may also be merit in including a matrix in the SEA environmental report to show the interrelationships between the various topics. This should be accompanied by relevant explanatory text.</p>	<p>Plans and Programmes in detail. Appendix A.2 of this SEA ER has also been included to support this Section, whereby, additional plans, programmes, policy and or legislation related to the draft GA Concept has been detailed.</p> <p>This comment is welcomed. All principles outlined in the draft GA Concept have been assessed in relation to potential environmental effects and potential cumulative effects</p> <p>Details on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied for the draft GA Concept have been detailed as appropriate throughout this SEA ER.</p> <p>Refer to Section 8.5 of the SEA ER for details of potential cumulative effects assessed. A matrix table has been included in this SEA ER, refer to Table 8.3 Intra-Plan Cumulative Effects' and relevant explanatory text included in this Section.</p>
	<p>23.Data & Knowledge Gaps:</p> <p>a. The Strategy should identify any significant data and knowledge gaps, including commitments to address these on a priority basis and where relevant, in association with other government departments/ organisations, during the implementation phase of the Strategy. This is with a view to strengthening the evidence base for future reviews and iterations of the Strategy.</p> <p>b. The SIFP SEA/AA and subsequent follow up studies should be consulted in undertaking the SEA and AA.</p>	<p>For the consideration of ESB.</p> <p>The SIFP SEA and AA were reviewed during the SEA and AA processes.</p>
	<p>24.Range of Effects:</p> <p>a. The SEA Environmental Report should refer to the full range of effects and of the area likely to be affected. This assessment should consider the duration and frequency of effects as well as short, medium and long-term, cumulative and synergistic effects of the Strategy. The EPA's Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020).</p>	<p>This SEA ER has been updated on the back of these comments, as appropriate. The EPA's Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020) was reviewed and implemented as appropriate throughout this SEA ER. Refer to Section 8 of the SEA ER for the assessment of environmental effects, principle environmental effects and cumulative effects identified.</p>
	<p>25.Monitoring, Implementation & Reporting:</p> <p>a. The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any unforeseen environmental issues that may arise. The SEA Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring.</p> <p>b. To avoid duplication in data collection, the same indicators should be used for the plan related and</p>	<p>Refer to Section 8 of the SEA ER. This Section includes a detailed monitoring table which incorporates a 'Likely Significant Environmental Effects Identified' column, specifying the likely positive, neutral, negative and or uncertain environmental effects that have been identified throughout the assessment. This table also includes monitoring frequency and responsibilities and includes provisions for reporting on the monitoring, as appropriate.</p>

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	SEA-related environmental monitoring aspects where possible.	
	<p>26.SEA Statement:</p> <p>a. Following the completion of the public consultation on the SEA environmental report and the Strategy, the final stages of the SEA process will be to integrate the environmental considerations of the SEA environmental report into the Strategy, as appropriate. In accordance with article 16 of the SEA Regulations, the ESB is required to publish a SEA Statement alongside the adopted Strategy, summarising:</p> <ul style="list-style-type: none"> – How environmental considerations have been integrated into the Strategy; – How the environmental report and consultation comments on it have been taken into account; – The reasons for choosing the Strategy as adopted, in the light of the other reasonable alternatives dealt with (in the Environmental Report and the associated consultation); – The measures decided concerning monitoring. <p>27.The EPA has published Guidance on SEA Statements and Monitoring (EPA, 2020), which should be considered in the preparation of the SEA statement.</p>	<p>An SEA Statement will be prepared following the finalisation of the draft GA Concept.</p> <p>The SEA Statement will summarise how environmental considerations have been integrated into the Strategy, how the draft SEA ER and consultation comments on it have been taken into account and the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with, and the measures decided concerning monitoring.</p> <p>The EPA has published Guidance on SEA Statements and Monitoring (EPA, 2020), will be reviewed and considered in the preparation of the SEA statement.</p>
	<p>28.Available Guidance & Resources:</p> <p>a. The EPA has published guidance notes that may be of assistance in preparing the SEA environmental report. You can access these SEA process guidance and topic and sector specific guidance documents along with other resources listed below at:</p> <p>b. EPA SEA GIS Search and Reporting Webtool: Our SEA GIS Search and Reporting Webtool has been updated recently and is now publicly available at https://gis.epa.ie/EPAMaps/SEA. It allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.</p> <p>c. Catchments.ie: Our https://www.catchments.ie/maps/ website provides a single point of access to water quality and catchment data from the National WFD monitoring programme.</p> <p>d. EPA Appropriate Assessment: GeoTool Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to a select a location, specify a search area and gather available information on European Sites.</p>	<p>This comment is welcomed. All Guidance and Resources detailed have been reviewed and incorporated into the SEA and AA processes, as appropriate.</p>
GSI	<p>29.With reference to your email received on the 11 March 2024, concerning the Draft Green Atlantic - Moneypoint Concept – SEA Scoping Report, Geological Survey Ireland would encourage use of and reference to our datasets. This data can add to the content and robustness of the SEA process. With this in mind, please find attached a list of our publicly</p>	<p>This comment is welcomed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER, as appropriate.</p>

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	<p>available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.</p>	
	<p>30.Geoheritage:</p> <p>A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation.</p> <p>NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer. The audit for Co. Clare was completed in 2005. The full report details can be found here. Our records show that there are no CGSs in the vicinity of the Moneypoint study area</p>	<p>Noted. This comment is welcomed, and this report has been reviewed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER, as appropriate.</p>
	<p>31.Groundwater:</p> <p>Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data. The Groundwater Data Viewer indicates an aquifer classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlies the Moneypoint study area boundary. GWClimate is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the Map viewer.</p>	<p>Noted. This comment is welcomed, and these data sources have been reviewed and the use of GSI datasets and referencing of the same have been incorporated into this SEA ER and SFRA, as appropriate.</p>

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	<p>32.Geotechnical Database:</p> <p>Resources Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.</p>	Noted. This comment is welcomed, and this database has been reviewed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER, as appropriate.
	<p>33.Geohazards:</p> <p>Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so. Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available. Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.</p>	Noted. This comment is welcomed, and this information has been reviewed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER and the associated SFRA, as appropriate.
	<p>34.Natural Resources (Minerals/Aggregates):</p> <p>Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer. We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licenced facilities, and that consideration of future resource sterilization is considered.</p>	Noted. This comment is welcomed, and these data sources have been reviewed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER, as appropriate.
	<p>35.Marine and Coastal Unit:</p> <p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications</p>	Noted. This comment is welcomed and INFOMAR data has been reviewed. The use of GSI datasets and referencing of the same has been incorporated into this SEA ER, as appropriate.

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	<p>for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour. INFOMAR data such as bathymetry, backscatter, sediment classification, shipwrecks and survey metadata can be downloaded free of charge in a variety of formats at the INFOMAR Marine Data Download Portal: https://experience.arcgis.com/experience/9213db3d963d4f3cab3a220323d7cd4e/page/Page-1/?views=Download-VectorDataset</p> <p>INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment https://www.infomar.ie/maps/downloadable-maps/maps. Story maps have also been developed providing a different perspective of some of the bays and harbours of the Irish coastline. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer. The Marine and Coastal Unit also participate in coastal change projects and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found here.</p>	
	<p>36.Other Comments- Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at mailto:GeologicalMappingInfo@gsi.ie, 01-678 2795.</p>	For the consideration of the ESB.
DAERA	<p>37.Natural Environment Division Comments: 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>	This comment is welcomed.
	<p>38.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 Error! Reference source not found. 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, however, would also like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.</p>	Noted. This comment is welcomed. The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the SEA ER also takes regard for transboundary effects of the draft GA Concept on Northern Ireland. Refer to Section 5.10 of this ER for details of likely transboundary issues, in regard to all environmental components. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the draft GA Concept.

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	39.NED notes within Section 1.3.4 that an AA (Appropriate Assessment) screening is to be carried out. NED would welcome the opportunity to review the completed AA screening and should it be required the Stage 2 AA when completed.	The draft GA Concept, draft SEA ER, draft combined Screening for AA and NIS and draft SFRA Report will go on public display as part of the public and statutory consultation period, at which time these stakeholders are welcomed to make submissions/observations on the draft GA Concept and the associated environmental and flooding reports.
	40.Please note following the decision of the United Kingdom to leave the European Union, the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom, and is including Northern Ireland.	Noted.
	<p>41.It may be worth including in your considerations the following:</p> <ul style="list-style-type: none"> a. The Wildlife (NI) Order 1985 (as amended) b. Wildlife and Natural Environment Act (NI) 2011 c. The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) d. The Environment (NI) Order 2002 e. The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 f. The Strategic Planning Policy Statement (SPPS) for Northern Ireland g. Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS’s will be superseded by Local Development Plans when they are adopted. h. Biodiversity Strategy for NI to 2020 https://www.daerani.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0 i. Draft Environment Strategy https://www.daerani.gov.uk/consultations/esni-publicdiscussion-document j. The Draft NI peatland policy: https://www.daerani.gov.uk/consultations/nipeatland-strategy-consultation. k. The Draft Green Growth Strategy Consultation on the draft Green Growth Strategy for Northern Ireland Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) l. Northern Ireland Energy Strategy 2050 Northern Ireland Energy Strategy 2050 Department for the Economy (economy-ni.gov.uk) DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are: Northern Ireland State of the Environment Reports: https://www.daerani.gov.uk/publications/state-environment-report-2013 Northern Ireland Environmental Statistics Reports: https://www.daerani.gov.uk/articles/northern-ireland-environmental-statistics-repor 	Noted. All Legislation, Plans, Programmes, Strategies, and resources detailed in this submission have been reviewed and considered, as appropriate within the SEA and AA processes.

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	<p>42.Other relevant web-links are; Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas Regional Landscape Character Map viewer:</p> <p>https://www.daerani.gov.uk/services/regional-landscape-character-areas-map-viewer DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer Our natural environment datasets are available at the link below: www.daera-ni.gov.uk/articles/download-digital-datasets Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive https://jncc.gov.uk/our-work/article-17-habitats-directivereport-2019/ and the UK Article 12 report for the Birds Directive https://jncc.gov.uk/our-work/european-reporting/#birds-directive-reporting</p>	Noted. All resources detailed in this submission have been reviewed and considered, as appropriate within the SEA and AA processes.
	<p>43.Air Quality:</p> <p>Regarding sections on Air & Biodiversity, Ireland is now included in the Air Pollution Information System (APIS) which provides information on the impacts of air pollutants, such as NOx, ammonia emissions and the associated N deposition on sensitive habitats and species. The map feature within APIS enables detailed information to be provided on the Critical Levels/Loads for each qualifying feature and background levels of these pollutants: APIS app Air Pollution Information System</p>	Noted. This data source has been reviewed and considered, as appropriate within the SEA and AA processes.
DHLGH	<p>44.Under Water Archaeology:</p> <p>The consultation documents have been reviewed by the Department and the following is its' initial observations; the Department will comment on further consultations as the project progresses. It is noted that the proposed development area incorporates/is proximal to waterbodies that are exceptionally rich in underwater cultural heritage. Underwater cultural heritage, including submerged wrecks over 100 years and archaeological objects, are protected by Section Error! Reference source not found. of the National Monuments (Amendment) Act 1987. The development area also includes a large number of recorded monuments that are afforded protection by the National Monuments Acts 1930-2014. In light of the potential effects on underwater cultural heritage, as outlined above, the Department recommends that a programme of pre-development underwater archaeological impact assessment should be scoped into the design process as soon as is practicable. The underwater archaeological impact assessment should be carried out at the earliest possible stage to facilitate the embedding of any recommended further mitigation within the detailed design for the project, as necessary, in order to ensure the preservation in-situ of any identified/potential underwater cultural heritage and to develop an informed archaeological strategy to be implemented in agreement with the Department.</p>	Noted. This comment is welcomed and has been incorporated into the Section 9.1 of the SEA ER, as appropriate. For the consideration of the ESB.

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>45.Archaeology:</p> <p>The Department welcomes the opportunity to comment on the Draft Green Atlantic @ Moneypoint Concept—SEA Scoping Report. The Department advises that you have regard to the following in preparing the SEA for this project.</p> <p>Relevant International, National or Regional Plans, Policies or Programmes: The National Monuments Acts 1930 to 2014 The specific national legislative code for protection of monuments, historic wrecks and archaeological objects is the National Monuments Acts 1930 to 2014. In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts.</p> <p>In terms of protection of monuments and related sites, the most widely applicable protective mechanism is the Record of Monuments and Places (RMP), established under section 12 of the National Monuments (Amendment) Act 1994. There are over 130,000 entries in the RMP, which takes the form of lists and maps for each county in the State. Copies of these lists and maps, as prepared in the 1990s, were circulated to all planning authorities and are now available in PDF format at www.archaeology.ie. The RMP includes the archaeological monuments which had been identified at the time it was issued. Of course, many more archaeological monuments have been identified since and, while these have not as yet been included in the RMP, an online database of known archaeological monuments, the Sites and Monuments Record (SMR)—including current RMP entries and ones which will be included in a revised RMP—is available as the Historic Environment Viewer.</p> <p>The RMP requires notice to be given to the Minister for Housing, Local Government and Heritage of proposed work at or in relation to monuments and places included in it (generally referred to as “recorded monuments”). Similar protection is provided by the Register of Historic Monuments (established under section 5 of the National Monuments (Amendment) Act (1987) to historic monuments and archaeological areas included in it.</p> <p>The strongest legal protection under the National Monuments Acts in respect of monuments is afforded to National Monuments of which the Minister for Housing, Local Government and Heritage or a local authority is owner or guardian or in respect of which a Preservation Order under the National Monuments Acts is in force. The consent of the Minister is required for interference with such national monuments or ground disturbance around or in proximity to them. A national monument is any monument the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it.</p> <p>Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the OPW has day</p>	<p>Noted. These comments are welcomed. All International, National or Regional Plans, Policies or Programmes listed have been reviewed and incorporated into Appendix A.2 of this SEA ER.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seek to provide public access to such national monuments.</p> <p>All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments (Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection.</p>	
	<p>46. Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023:</p> <p>The recently signed Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023) will replace the National Monuments Acts (1930–2014).</p> <p>The Bill will provide for the protection of historic and archaeological heritage. A new ‘Register of Monuments’ will be established, replacing several overlapping designation and registration systems currently in operation. Newly discovered archaeological sites will be afforded immediate legal protection, mirroring the existing system for archaeological objects and historic wrecks that are automatically protected without a need for formal designation or registration. This will be reinforced by a statutory reporting scheme for finds of monuments. Subject to certain exceptions, archaeological objects with no known owner will automatically become the property of the State. A new civil enforcement procedure can be used as an alternative to, or to supplement, criminal proceedings. The bill makes explicit provision for the protection of World Heritage sites, including, for the first time, a definition in Irish law for “World Heritage Property”. The new legislation enables the State to ratify or accede to certain international conventions, notably the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property and the 1995 UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects. The Act gives further effect to the 1992 Council of Europe European Convention on the Protection of the Archaeological Heritage (the “Valletta Convention”).</p> <p>The Act introduces a new integrated licensing system whereby one licence can authorise a range of activities and, for the first time, a statutory appeals process will be established to review licensing decisions.</p> <p>Note while this new legislation has been signed into law, most of the provisions of the Act have not yet been commenced. However, it is expected that substantive implementation will occur within the lifetime of this Updated National Energy & Climate Plan 2021-2030.</p>	<p>Noted. These comments are welcomed. All International, National or Regional Plans, Policies or Programmes listed have been reviewed and incorporated into Appendix A.2 of this SEA ER.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>47. International Conventions:</p> <p>Ireland is a party to the 1972 UNESCO World Heritage Convention. Although not as yet a party to the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, Ireland supported its adoption and has through the recent Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023) directly facilitated its ratification. As already noted above the new Act will enable the State to ratify or accede to certain other international conventions as well, notably the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property and the 1995 UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects.</p>	<p>Noted. These comments are welcomed. All International, National or Regional Plans, Policies or Programmes listed have been reviewed and incorporated into Appendix A.2 of this SEA ER.</p>
	<p>48. National policy on protection of the archaeological heritage:</p> <p>The Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) was published so as to promote a high level of compliance with the aims and requirements of the Valletta Convention. It sets out national policy on the protection of the archaeological heritage in the course of development. While not specifically directed at the planning system, as operating under the Planning and Development Acts, it speaks to all development control codes. Core elements of the policies set out in the Framework and Principles document include emphasis on the non-renewable nature of the archaeological heritage and the need to always consider its preservation in-situ as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.</p>	<p>Noted. These comments are welcomed. All International, National or Regional Plans, Policies or Programmes listed have been reviewed and incorporated into Appendix A.2 of this SEA ER.</p>
	<p>49. The Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage is one of nine sectoral plans published in 2019 under the National Adaptation Framework. It outlines five adaptation goals for built and archaeological heritage in Ireland and maps them onto an action plan of specific actions to be implemented.</p>	<p>Noted. These comments are welcomed. All International, National or Regional Plans, Policies or Programmes listed have been reviewed and incorporated into Appendix A.2 of this SEA ER.</p>
	<p>50. Environmental Baseline—Data/information sources:</p> <p>This Department would draw attention to the following data sources about the archaeological and cultural heritage environment relevant to the Concept and its associated environmental assessments. NMS website</p> <p>The NMS's website (www.archaeology.ie) is a key source of data, information and publications, including GIS datasets, including amongst other things:</p> <ol style="list-style-type: none"> Historic Environment Viewer (HEV) – SMR dataset and NIAH dataset (both datasets can be downloaded or accessed by third party GIS software) Wreck Viewer - records of over 18,000 known and potential wreck sites in Irish waters RMP – digitised maps and gazetteers for each County List of National Monuments in Ownership or Guardianship of the Minister List of Preservation Orders currently in force. 	<p>Noted. These data sources have been reviewed and considered, as appropriate within the SEA ER and associated Maps.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>51. World Heritage in Ireland:</p> <p>The World Heritage in Ireland website (www.worldheritageireland.ie) provides general information about UNESCO and World Heritage as well as specific information on the World Heritage in Ireland. It provides a current list and supporting documentation and reports for all currently inscribed World Heritage sites within Ireland as well as the most recent list of Tentative sites (i.e. sites proposed for future inscription).</p>	<p>Noted. These comments are welcomed. This data source has been reviewed and considered, as appropriate within the SEA ER and associated Maps.</p>
	<p>52. Environmental Baseline and Key Environmental Issues and Opportunities</p> <p>Archaeological, Architectural and Cultural Heritage: Baseline:</p> <p>This Department would draw particular attention to the omission of underwater archaeology from the draft SEA. Given the location of the development under consideration, this is a significant omission. Known underwater archaeological sites enjoy equivalent legal protection to known terrestrial sites. All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments (Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection.</p>	<p>Underwater archaeological impacts have been taken into consideration as part of this SEA ER, refer to Section Error! Reference source not found. and Section Error! Reference source not found. of this SEA ER. Refer to mitigation measures of this SEA ER and refer to mitigation as included in the combined Screening for AA and NIS.</p>
	<p>53. Archaeological, Architectural and Cultural Heritage: Key Issues and Opportunities</p> <p>This Department advises that the key issues should be expanded as follows:</p> <p>The construction of new developments increases the potential to negatively impact on known or previously unknown archaeological sites and features both terrestrial and underwater. This includes impacts to the setting and amenity of archaeological sites and features as well as direct impacts;</p>	<p>Noted. Potential impacts on known or previously unknown underwater and terrestrial archaeological have been taken into consideration, as appropriate as part of this SEA ER. Refer to Section 8 and Section 9 of this SEA ER.</p>
	<p>54. Scoping Question # 2: Are there any additional environmental sensitivities or changes in weightings that should be included in the sensitivity mapping?</p> <p>This Department considers that the weighting of 1 suggested for archaeological monuments is not appropriate. These are sensitive receptors we advise a minimum weighting of 5 for Recorded Monuments and known Wreck Sites with a higher weighting of 10 for National Monuments and World Heritage Sites.</p>	<p>This comment is welcomed. The ESM in Appendix A.1 has since been updated, as appropriate to reflect these comments.</p>
	<p>55. Scoping Question No. 5: Do you have any comments regarding the draft SEA environmental objectives, targets or indicators?</p> <p>This Department advises that the following alternate wording be adopted in this table for the entry on Archaeological, Architectural and Cultural Heritage:</p>	<p>This comment is welcomed. Table 6.1 has since been updated to reflect these comments.</p>
	56. Targets	

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>a. Protect sites places, features, buildings, and landscapes or seascapes of cultural, archaeological, or architectural heritage and their context from significant adverse effects resulting from the implementation of the draft GA Concept.</p> <p>b. Any projects progressed under the draft GA Concept will adhere to the 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.</p> <p>57.Indicators</p> <p>a. Avoidance of significant adverse effects, both direct and indirect, to sites and features of archaeological/architectural/cultural heritage (both terrestrial and underwater) as a result of the implementation of the draft GA Concept.</p>	
	<p>58.Nature Conservation:</p> <p>The Department welcomes the opportunity to provide observations in relation to the Draft Green Atlantic @ Moneypoint Concept. Arup has been commissioned by the ESB to carry out Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) of the draft GA Concept. The Department has reviewed the SEA scoping document and a series of ‘Scoping Questions’. The following observations including comments on scoping questions are made by the Department in its role as a prescribed body under SEA legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives).</p> <p>a. Scoping question 1: Are there any other relevant International, National or Regional Plans or Programmes that should be considered?</p> <p>b. EirGrid’s Grid 25 Programme,</p> <p>c. The Clare Wind Energy Strategy,</p> <p>d. Wind/renewable energy strategies for surrounding counties,</p> <p>e. Existing projects and infrastructure (constructed and permitted) should also be taken into account.</p>	<p>Noted. Additional International, National or Regional Plans or Programmes have been included within Section 3 and Appendix A.2Error! Reference source not found. of this SEA ER, as appropriate.</p> <p>Noted. The available planning history for the Moneypoint Generating Station site has been included in Section 1.1. of this SEA ER.</p>
	<p>59.Scoping question 2: Are there any additional environmental sensitivities or changes in weightings that should be included in the sensitivity mapping?</p> <p>a. The Department recommends semi-natural habitats including scrub and wet grassland should not be weighted 0. A minimum of 1 is recommended.</p>	<p>This comment is welcomed. The ESM in Appendix A.1 has since been updated, as appropriate to reflect these comments.</p>
	<p>60.Scoping question 4 - Are there any environmental issues that should be scoped out of the SEA at this stage?</p> <p>61.The Department has no comment at this time.</p>	<p>Noted.</p>
	<p>62.Scoping question 5- Do you have any comments regarding the draft SEA environmental objectives, targets, or indicators?</p> <p>63.Regarding the two indicators “Level of biodiversity gain achieved as a result of the implementation of the draft GA Concept” and “Level of biodiversity lost as a result of the implementation of the draft GA Concept” – how will this be measured?</p>	<p>Refer to the monitoring table in Section 9.2 of this SEA ER where details of monitoring sources and frequency/ responsibility has been assigned to each indicator listed in Section 6 ‘Objectives, Targets and Indicators’.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>64. General comments:</p> <p>65. There will be overlaps and linkages between biodiversity in SEA, and sites, habitats and species of relevance to the Appropriate Assessment and Articles 6(3) and 6(4) of the Habitats Directive. SEA should address all such issues in general, as well as the implications for any other relevant provisions of the Habitats and Birds Directives, including in respects of Article 6(1), 6(2) and 10 of the Habitats Directive, and associated national legislation.</p>	<p>The SEA and AA processes have been undertaken as an iterative process, both of which have also informed and fed into the preparation of the draft GA Concept throughout its development. Similarly, all mitigation provided in both the SEA and AA were undertaken in an iterative manner and fed into the preparation of the draft GA Concept throughout its development.</p>
	<p>66. The biodiversity, flora and fauna section of the Environmental Report should be prepared in conjunction with the NIS, if required, to ensure integration of biodiversity issues and concerns. The EPA's Integrated Biodiversity Impact Assessment best practice guidance is of relevance in this regard. The EPA's SEA of Local Authority Land-Use Plans – EPA Recommendations and Resources, 2020 Version 1.6. is also a useful reference.</p>	<p>The SEA and AA processes have been undertaken as an iterative process, both of which have also informed and fed into the preparation of the draft GA Concept throughout its development. Similarly, all mitigation provided in both the SEA and AA were undertaken in an iterative manner and fed into the preparation of the draft GA Concept throughout its development. Both the EPA's Integrated Biodiversity Impact Assessment best practice guidance and the EPA's SEA of Local Authority Land-Use Plans – EPA Recommendations and Resources have been reviewed and considered, as appropriate throughout this SEA ER.</p>

A.2 Submissions from Public Bodies on GA Concept (As they relate to the SEA Only)

Organisation/ Individual	Consultation feedback	Recommendation/ Response
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>	These comments are welcomed.
	<p>Marine and Fisheries Division Comments:</p> <ul style="list-style-type: none"> • We welcome the environmental integration of biodiversity, climate, and heritage applied in the SEA and Natura Impact Statement (NIS) • 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. 	These comments are welcomed.
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.</p> <p>EPA recommends that SEA-related monitoring and monitoring associated with the EPA licence 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>	For consideration of ESB. Noted. Section 9 of the SEA ER has since been updated to reflect this comment, as appropriate.

	<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>	<p>These comments are welcomed.</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>	<p>These comments are welcomed.</p> <p>Noted. Section 9 of the SEA ER takes account of specific environmental issues and unforeseen adverse impacts should they arise. It also considers both positive and negative effects. With regards to addressing the possibility of cumulative effects, Section 9 of the SEA ER has since been updated to reflect this comment, as appropriate.</p> <p>The EPA Guidance on SEA Statements and Monitoring (EPA, 2023), has been reviewed and considered as part of the SEA process.</p>
	<p>Future Amendments to the Strategy</p> <p>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.</p>	<p>Any future amendments to the draft GA Concept will be screened for potential for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the draft GA Concept. This screening will be documented in the form of an addendum to the SEA ER.</p>

	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Strategy is adopted, you should prepare an SEA Statement that summarises:</p> <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. <p>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</p>	<p>An SEA Statement has been prepared for the draft GA Concept (this report). This SEA Statement summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Strategy; • How the SEA ER, 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. <p>A copy of the SEA Statement will be sent to any environmental authority consulted during the SEA process. EPA guidance on SEA Statements has been reviewed, considered and has informed this SEA Statement.</p>
	<p>Environmental Authorities</p> <p>Under the SEA Regulations, you should consult with:</p> <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 	<p>All environmental authorities will be consulted with, as listed under the SEA Regulations.</p>
DAFM	<p>The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the SEA consultation for the draft Green Atlantic @ Moneypoint Concept 2025.</p> <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>	<p>Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture, as appropriate.</p>

	<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>	<p>Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture, as appropriate.</p>
	<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>This comment is welcomed. Refer to the combined AA Screening and NIS report for full details of LSE to the Lower River Shannon SAC (Code 002165) and River Shannon and Fergus Estuary SPA (Code 004077) as a result of the draft GA Concept.</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>Further 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>	<p>Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture, as appropriate. Furthermore, the website link provided (information on the location of aquaculture sites) has been reviewed and considered in the SEA ER, as appropriate.</p>

	<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>	Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture, as appropriate.
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. • Neither fishing or aquaculture activities are considered or reviewed in the currently available documentation. 	Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture, as appropriate.
	<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>	Noted.

	<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>Noted. The SEA ER has since been reviewed and updated to reflect comments regarding sea-fishing and aquaculture including pot fishing activities, aquaculture licence sites and fishery orders, as appropriate.</p>
	<p>Ireland's Marine Atlas (https://atlas.marine.ie)</p>	<p>Noted. Ireland's Marine Atlas was reviewed and considered, as appropriate.</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. 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). Therefore, to ensure this outcome, this commitment must also be included within the Concept 2025 draft.</p>	<p>Noted. Section 5.7 of the SEA has been updated to reflect these comments, as appropriate.</p> <p>Comments regarding additional OP's are welcomed. A response from ESB is provided in the Consultation Response Document.</p>
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	<p>Underwater Archaeology</p> <p>It is noted that the extent of the lands in ownership—as defined in Draft Green Atlantic @ Moneypoint Concept 2025 Figure 4—includes a substantial area of foreshore with known and potential underwater cultural heritage, which has been the subject of prior geophysical survey and underwater archaeological assessment (Archaeological Assessment of Marine Geophysical Datasets: Moneypoint Hub, Co. Clare, Interim Report by Dr Conn Herriott, Archaeological Management Solutions (December 2024)). Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old and archaeological objects underwater or the potential location of such a wreck or archaeological object, can also be protected under Section 3 of the 1987 (Amendment) Act. It should be noted that the Frameworks and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage and the Gaeltacht and the Islands 1999, see Sections 3.6.1(3) and 3.6.4) sets out national policy on the protection of the archaeological heritage in the course of development. It includes emphasis on the non-renewable nature of the archaeological heritage, the need to always consider its preservation in-situ as the first option and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development:</p> <p>‘There should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage. Preservation in situ must always be the first option to be considered rather than preservation by record in order to allow development to proceed, and preservation in-situ must also be presumed to be the preferred option’ (Section 3.4).</p> <p>Similarly, the National Planning Framework First Revision (April 2025) states that ‘the protection of archaeological heritage is recognised as a core component to achieving sustainable development’.</p> <p>Accordingly, it is recommended that the overarching principles include the following:</p> <ul style="list-style-type: none"> • The carrying out of advance Underwater Archaeological Impact Assessment to inform development designs and facilitate assessment and formulation of appropriate mitigation strategies for any likely significant effects on underwater cultural heritage. • Alignment of any development projects 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>Noted. Section 5.7 of the SEA has been updated to reflect these comments, as appropriate.</p> <p>Comments regarding additional OP’s are welcomed. A response from ESB is provided in the Consultation Response Document.</p>
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	<p>Should you require any further information or clarification on any of the above submission, please do not hesitate to contact the Department.</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>	Noted.
Clare County Council	<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>	Noted. The key policy, plans and programmes are discussed in Section 3 of the Environmental Report.
	<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>	Noted. Reference to these initiatives and objectives are now included in Section 3 of the Environmental Report.

	<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 8.12 Renewable 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 • 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>Noted. The Clare County Development Plan 2023-2029 is considered under Section 3.2.6 of the Environmental Report.</p>
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	<p>Specifically, CDP Objective 12.6 relates to Strategic Development Location B – Moneypoint and sets out the following:</p> <ul style="list-style-type: none"> 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> 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> 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> 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> 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><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>	
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	<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> <p>A.4</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>Noted. The SIFP for the Shannon Estuary is referenced where appropriated in the Environmental Report.</p>
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	<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>	<p>This has been addressed by the ESB in the Consultation Response Document.</p>
	<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 subnational 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>	<p>Noted. The Section 3.2.5.1 of the Environmental Report has been updated to reflect this.</p>

	<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</p>	<p>Noted.</p> <p>An explanation to the colour coding included in Table 8.2 is explained in Table 8.1 of the Environmental Report.</p>
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	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><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>	The Environmental Report has been updated/amended to include reference to these plans.
	<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>	This has been addressed by the ESB in the Consultation Response Document.

	<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>	<p>This has been addressed by the ESB in the Consultation Response Document.</p>
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A.5 Recommendations Arup made to ESB on the GA Concept during the SEA process.

Related GA Concept Principle	Recommendation to ESB
MEZ1, MEZ3, MEZ6, MEZ 7, MEZ9, CIZ1, CIZ3, CIZ5, CIZ7, CIZ8, IEZ2, IEZ3, IEZ5, AMZ5, AMZ7, GDZ1, GDZ2, GDZ3, BZ1, BZ2, BZ3, BZ4, TAZ2, SZ1 and WZ2.	It is a recommendation of this SEA that this principle incorporates the mitigation measures in Section 9 of SEA.
MEZ2	It is a recommendation of this SEA that this principle is listed as the first and overriding principle of the GA Concept, to highlight the sensitivity and high regard being taken for the adjoining Lower River Shannon SAC (site code 0002165) and River Shannon and River Fergus Estuaries SPA.
CIZ3	It is a recommendation of this SEA that this principle includes the following text ' <i>Any development that has potential to occur in this zone must take cognisance of the visual and ecological sensitivity of the adjoining coastline, which includes the Lower River Shannon SAC (site code 0002165) and River Shannon and River Fergus Estuaries SPA</i> '.
CIZ5	<p>It is a recommendation of this SEA that ESB spilt this principle into two separate principles, as follows.</p> <ol style="list-style-type: none"> 1. Electrical infrastructure will not be located in proximity of the existing wind turbine. All other development at these locations will be assessed having regard to the risk of impacts arising. 2. ESB will consider the removal or relocation of the wind turbine where such a proposal would facilitate the broader scale development of the site for purposes associated with marine energy. <p>It is also a recommendation of this SEA that ESB remove the following text from this principle '<i>all other development at these locations will be assessed having regard to the risk of impacts arising</i>'.</p>
AMZ7	<p>It is a recommendation of this SEA that ESB spilt this principle into three separate principles, as follows.</p> <ol style="list-style-type: none"> 1. Electrical infrastructure will not be located in proximity of the existing wind turbine. 2. All other development at these locations will be assessed having regard to the risk of impacts arising.

	3. ESB will consider the removal or relocation of the wind turbine where such a proposal would facilitate the broader scale development of the site for purposes associated with marine energy.
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