

Local Planning Office County Hall Castlerock Road COLERAINE BT51 3HS

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Date: 21st March 2017

Tel: 028 7034 7244

Dear Ms Armstrong,

Re: Fair Head Tidal Array - Joint Marine Licence and Article 39 Application: Council response.

Thank you for your correspondence, received on 21st February 2017, in relation to the above matter.

I wish to advise that a Workshop was held on Monday 20th March 2017 to inform Elected Members of the details of this proposal, including the findings contained within the Environmental Statement. It was agreed that I would respond on behalf of Council.

Firstly, I wish to highlight that Members consider the deadline for responding to this consultation was not sufficient, given the timescales in getting such consultations through the necessary local government procedures.

Secondly, I wish to highlight the following environmental designations which intersect the project area:

Special Areas of Conservation (SACs)/Sites of Community Importance (SCIs):

There are, in total, three designated SACs/SCIs which intersect the project area. These areas contain rare and vulnerable habitats and/or species of European importance:

- Breen Wood qualifies due to Bog Woodland, Old sessile oak woods with Ilex and Blechnum.
- Rathlin Island qualifies due to submerged or partially submerged sea caves, Annual vegetation of drift lines, Reefs, Subtidal sandbanks, Vegetated sea cliffs of the Atlantic and Baltic coasts.
- Red Bay SCI qualifies due to Sandbanks which are slightly covered by sea water all of the time.

Special Protection Areas (SPAs);

Three SPAs intersect the project area. These areas are important for rare and vulnerable bird species as they use them for breeding, feeding, wintering or migration;

- Antrim Hills qualifies by supporting nationally important populations of hen harrier and merlin. The site encompasses all lands within these boundaries, excluding wholly-improved pasture, arable land, buildings and associated lands. It includes coniferous plantations, blanket bog, wet and dry heath, grass moor, scrub, inland cliff and limited semi-improved agricultural grassland. The principal interests are the breeding populations of hen harrier and merlin.
- Rathlin Island qualifies by supporting important numbers of Peregrine Falcon. The site further qualifies by supporting internationally important breeding numbers of migratory species: Razorbill, Guillemot and Kittiwake. Additionally, Rathlin SPA regularly supports over 20,000 breeding seabirds. Species include, fulmar, shag, eider, common gull, herring gull, lesser black-backed gull, black guillemot, puffin and Manx shearwater.
- Sheep Island qualifies by regularly supporting, in summer, a nationally important breeding population of the Northern European sub-species of Cormorant. In addition, the population is the largest in the north of Ireland and thus makes an important contribution to the range of the sub-species.

Areas of Special Scientific Interest (ASSIs):

ASSIs that intersect the project area are as follows;

- Rathlin Island Ballycarry
- Rathlin Island Ballygill North
- Rathlin Island Kinramer South
- Rathlin Island Coast
- Sheep Island
- Carrickarade
- Tow River Wood
- Breen Wood
- Tievebulliagh
- Ballycastle Coalfield
- Torr Head
- Castle Point
- Slieveanorra and Croaghan
- Glenballyemon River
- Carey Valley
- Fair Head and Murlough Bay
- Church Bay
- Rathlin Island Kebble
- Capecastle

Areas of outstanding Natural Beauty (AONBs);

Two AONBs intersect the project area;

- Antrim Coast & Glens
- Causeway Coast & Glens (partial)

Nature Reserves (NRs):

Three Nature Reserves intersect the project area;

- Breen Oakwood
- Keeble
- Slieveanorra Forest

Marine Conservation Zones (MCZs)

Two MCZs interact the project area;

- Waterfoot
- Rathlin Island

Council would highlight the potential impact that this proposal may have on the environmental designations listed above. Particular concerns were raised that, due to the limited research and information provided in relation to the medium to long term impact, the effect of the proposed development on the designated features of these environmental designations is uncertain.

Council is also concerned that, dependent on the turbine type used, there will be a significant impact on the seascape when viewed from Torr Head.

Finally, the potential impacts of this project may not be evident in the short term. Therefore Council consider that it is critical that the proposed environmental monitoring plan is continual and meaningful, in the short, medium and long term, to assess the impacts arising from this project. Should any significant negative impacts be found Council would request that the licence is revoked and the turbines removed, unless satisfactory mitigation measures can be implemented.

Yours faithfully,

p.p. S. Mulhern

Denise Dickson Head of Planning