Environment, Marine & Fisheries Group
Marine & Fisheries Division

Department of
Agriculture, Environment and Rural Affairs
An Roinn
Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe
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Reference: MLEIA2026013
Date: 17th September 2026

Dear [redacted]

Re: SCOPING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)

Proposal: Gas Storage Facility – Islandmagee, County Antrim

I am writing in response to your request for a scoping opinion made under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (Marine Works Regulations).

The purpose of the Environmental Impact Assessment (EIA) scoping procedure is to determine what information should be provided in the Environmental Statement (ES). In reaching our scoping opinion we have considered the requirements of Schedule 3 of the Marine Works Regulations and consulted with the bodies that we consider have an interest in the project by reason of their environmental responsibility. As required by the Marine Works (EIA) Regulations 2007 (as amended) we have had regard to their comments, and had regard to the information provided in the Islandmagee Gas Storage – EIA Scoping Report dated 9th October 2025 produced by Tetra Tech.

The consultation stage of this process was initiated by DAERA Marine Licensing Branch on 02 March 2026 and is now closed.

Scoping Opinion

The scoping opinion is based on the information provided in the supporting documents, submitted to the DAERA in November 2025. The scoping opinion does not take into account any changes to the project that may have occurred after this date.

Annex 1 of this letter sets out the additional information that is considered necessary to be included and/or assessed in the Environmental Statement for the project. Annex 2 provides responses from each consultee. Please note that the matters identified in Annex 1 do not represent an exhaustive list of requirements. Additional information may be requested at the licence application stage.

Please also note that our scoping opinion will be provided to all bodies consulted and will be published on the DAERA Public Register.

Yours sincerely

[redacted]

Marine & Aquaculture Licensing

ANNEX 1

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion

MLEIA2026013

From the documents provided, the Department's understanding of the proposal is as set out in this Opinion. This Annex contains a summary of the proposed scheme, the locations, designations and a summary of the key areas for consideration.

1. Summary of the Proposal

Islandmagee Energy Limited (IMEL) is proposing to develop a gas storage facility, namely the Islandmagee Gas Storage Facility (IGSF), at Islandmagee in County Antrim. This proposal is comprised of three main sites and associated marine components at Islandmagee:

- The construction of the caverns;
- The construction of saltwater intake;
- The construction of a brine outfall.

The primary site is the Islandmagee Gas Storage Facility (IGSF), consisting of seven individual caverns situated within Permian salt beds of Larne Lough. Each cavern will have a volume of approximately 480,000 cubic metres (m^3). This site is located south east of Ballylumford on the west side of Islandmagee peninsula, (as shown in Figure 1 and Figure 2 below). Each of the seven caverns are situated approximately 1,350 metres (m) below the east side of Larne Lough, around 500 metres (m) off the west coastline of Islandmagee from close proximity to 22 Ballylumford Road. This facility is capable of storing up to a total of 500 million standard cubic metres (m^3) of market ready gas from the NI transmission network.

There are two ancillary sites associated with the proposal, consisting of a saltwater intake site and a brine outfall site. These two sites are located adjacent to each other, on the east side of the Islandmagee peninsula, northeast of Ballylumford on the Irish Sea coastline. The saltwater intake is located on the eastern side of Islandmagee and will extract water directly from the Irish Sea. The proposed intake head is located in approximately 10 metres (m) water depth. The brine outfall pipeline will traverse across the Islandmagee peninsula from the wellsite on the western side, to the discharge point on the eastern side of Islandmagee, where a 400mm HDPE pipeline is proposed to discharge brine directly into the Irish Sea.

Planning permission ref: F/2010/0092/F (the 'Extant Permission') within the Mid and East Antrim Borough Council area (formerly Larne, Carrickfergus & Ballymena), was approved on 18 October 2012, for lands southeast and northeast of Ballylumford pressure reduction station, Ballylumford Road, Islandmagee, with extending underground pipelines. The approval was for the above ground facilities associated with the proposed Gas Storage Facility for the storage of natural gas. This includes underground pipelines, gas storage plant, leaching plant, seawater pumping station, temporary construction compound and wellpad to accommodate drilling rig for no. 7 boreholes

2. Location

The proposed development is located within Larne Lough at Islandmagee, County Antrim, approximately 1,500m below the seabed. The facility and associated above ground operating facilities will be located near Ballylumford, County Antrim.

The development is proposed over three sites, the primary site is for the Islandmagee Gas Storage Facility (IGSF), is located south east of Ballylumford on the west side of Islandmagee peninsula, as shown in Figure 1 and Figure 2 of this opinion and will consist of seven individual caverns situated within Permian salt beds of Larne Lough. The two ancillary sites also proposed consist of a saltwater intake site and a brine outfall site. These two sites are located adjacent to each other, on the east side of the Islandmagee peninsula, northeast of Ballylumford on the Irish Sea coastline.

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Fig 1: Location of the Marine Application areas associated with the project

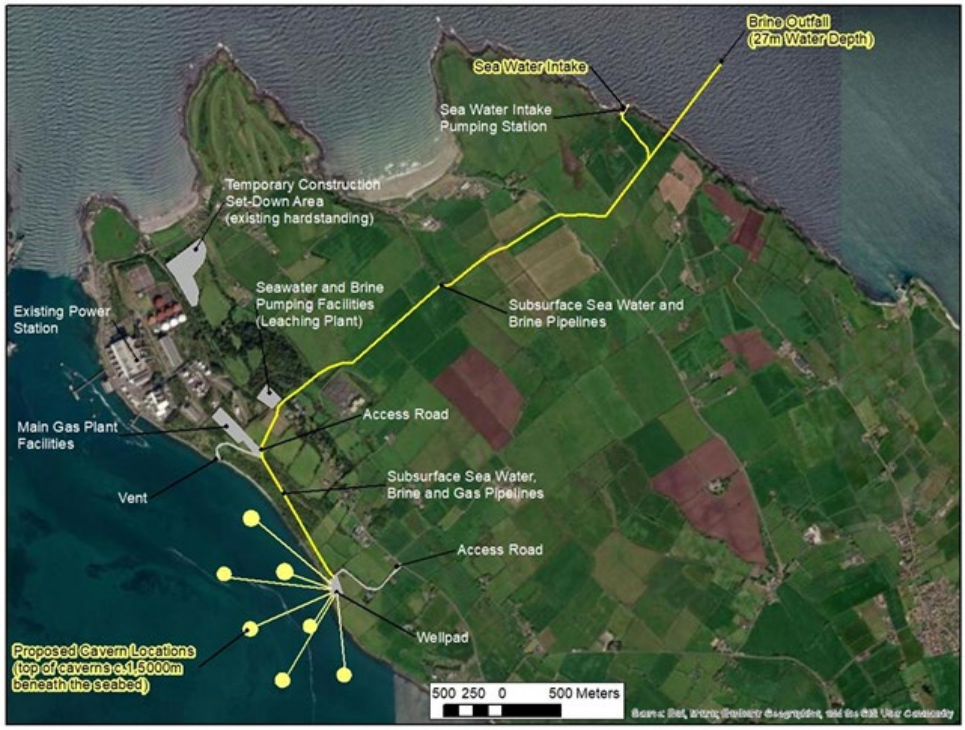


Fig 2: Location overview of terrestrial elements (permitted under extant planning permission, labelled in white) and proposed marine elements (labelled in yellow)

3. Project background

Islandmagee Energy Limited (IMEL) have noted in Chapter 1.3 'Need for Gas Storage' of the Scoping Report document (dated October 2025), that gas in Northern Ireland is used to provide energy both in the form of gas for heating and to supply industrial processes, as well as being the sole source of energy for thermal electricity generation. Currently, almost the entirety of NI's gas supply is imported from GB via the Scotland-Northern Ireland Pipeline (SNIP), running from Moffat in Scotland, to Islandmagee in Northern Ireland. The applicant's position is that consequently, the NI gas supply system is potentially highly vulnerable to supply disruptions and heightens the need for a strategically located storage facility in NI. It is therefore envisaged that gas storage facilities will play a role in stabilising supply and future energy prices, as well as improving energy security and resilience in the UK and NI.

4. Designations

The following designations are relevant to the consideration of this proposal:

Primary facility:

- Larne Lough ASSI – (adjacent) West shoreline area of Islandmagee Peninsula
- Larne Lough SPA – (adjacent) West shoreline area of Islandmagee Peninsula
- Larne Lough RAMSAR - (adjacent) West shoreline area of Islandmagee Peninsula
- East Coast Marine pSPA – (adjacent) West shoreline area of Islandmagee Peninsula
- North Channel SAC - West of Islandmagee Peninsula
- The Maidens SAC (3-4km away)

- Outer Belfast Lough MCZ (25km away)

Seawater intake and brine outfall:

- North Channel SAC – (within designated area), East of Islandmagee Peninsula
- East Coast Marine pSPA – (within designated area), East of Islandmagee Peninsula
- Larne Lough ASSI – (adjacent) West shoreline area of Islandmagee Peninsula
- Larne Lough SPA – (adjacent) West shoreline area of Islandmagee Peninsula
- Larne Lough RAMSAR – Eastern shoreline area of Islandmagee Peninsula
- The Maidens SAC (~2-3km away)
- Outer Belfast Lough (20-22km away)

5. Issues for Consideration

Legislation and Policy

The department notes Chapter 1.5.2 '*Relevant Legislation and Policy'* of the Scoping Report dated October 2025, listing key legislation and policies relevant to the proposal.

Relevant Legislation

The Marine Act (Northern Ireland) 2013 and Coastal Access Act 2009 (MCAA) establishes the legal framework for regulating certain activities within UK marine waters through a marine licensing system. Part 4 of the Act governs marine licensing, and in Northern Ireland these licensing and enforcement functions are carried out by the Marine and Fisheries Division of the Department of Agriculture, Environment and Rural Affairs (DAERA). DAERA is the regulator responsible for determining marine licence applications within the Northern Ireland inshore region, extending from the coastline out to 12 nautical miles (nm).

The Marine Works (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 apply to marine works within Northern Ireland's territorial waters, extending to 12 nautical miles (nm) from the coast. The Regulations ensure that the Department of Agriculture, Environment and Rural Affairs (DAERA) Marine and Fisheries Division, as the competent authority responsible for granting the primary consent for a development, makes its decision with full consideration of any likely significant effects that the proposed project may have on the environment.

Climate Change

The Climate Change Act (Northern Ireland) 2022 has been published since the previous Environmental Statement and licensing regime was in place for this proposal and issues relating to climate change have also moved on considerably since the previous ES and licence was in place. As part of the draft Marine Plan for Northern Ireland, where climate change has the potential to impact on a proposal during its lifetime, a public authority may require the proposer to demonstrate:

- How the impact has been considered; and
- Measures to address the adverse impact, where appropriate.

Consideration should be given to the Climate Change chapter of the draft Marine Plan.

The department welcomes the *'Climate Change'* topic chapter considered in the EIA scoping report dated October 2025. Climate change should be included as a standalone chapter in the ES. This chapter should comply with the legislation and climate change policies now in place, to ensure the project work aligns itself to the legislative requirements under the Climate Change Act (Northern Ireland) 2022 and should include an assessment of impacts and appropriate mitigation.

It is noted that consideration has been given to direct and indirect sources of emissions of GHGs and the potential impacts on climate that may occur during the construction, operation (to include maintenance) and decommissioning phases.

Mitigation is one of two main ways Climate Change can be addressed under the draft Marine Plan for Northern Ireland and so the department welcomes that consideration of the requirement and feasibility of embedded mitigation measures will be given during the consultation period for any future licence application package for the proposal.

Relevant Policy

It is noted that reference is made to the UK Marine Policy Statement and the draft Marine Plan for Northern Ireland under Chapter 1.5 and Chapter 15.6 of the EIA Scoping report, dated October 2025. You must ensure that detailed reference is made to and consideration of compliance with these publications and associated policies in the future Environmental Statement for the proposal.

Although at the date of the opinion being issued, the Marine Plan remains in draft and has not been formally adopted, to note, the Draft Marine Plan is currently being reviewed and may be updated, please ensure you use the most up to date revision of the plan.

- Draft Marine Plan Northern Ireland

All public authorities are responsible for implementing the Plan through existing regulatory and decision-making processes, the draft Marine Plan for Northern Ireland was published on 18 April 2018. The Plan must be used for all planning decisions for the sea, coast, estuaries and tidal waters, as well as developments that impact or might impact these areas, such as infrastructure. The draft Marine Plan for Northern Ireland should be fully considered by the applicant and included in any future consolidated ES.

Other plans, policies and legislation that must be considered and addressed in detail include, but are not limited to, the following:

- The OSPAR Convention – updated June 2025
- The Water Framework Directive –updated in February 2025
- River Basin Management Plans – began their third cycle in 2021
- Bathing waters Directive (76/160/EEC)
- Shellfish Waters Directive (2006/113/EC)

Coastal processes and sediment transport

It is noted that Coastal Processes is a topic Chapter 23, in the Scoping Report dated October 2025. This should be a standalone chapter in the proposed ES.

The scoping request document notes that the study area for the scoping has been determined on the basis of modelling, with the study area (Figure 23-1 of scoping report), initially defined as the extent of one tidal ellipse around the project infrastructure, further extended to account for residual currents along the coastline.

DAERA Marine Conservation & Reporting, Coastal Processes team have noted that there is no reference made to the landfall elements of the facility and the potential impacts on local coastal processes and as such, should be considered and scoped into any future ES.

It is noted that although the caverns themselves have no pathway to increase suspended sediments or alter coastal processes such as waves, tides and sediment transport due to all construction activities taking place underneath the seafloor or on land. Scoping Report Chapter 23.5 of the scoping report (dated October 2025) notes that there is the potential of increased suspended sediment concentrations and associated depositions due to the presence of the project infrastructure.

Sediment transport has been addressed in Chapter 23.4.6 of the Scoping Report (dated October 2025). It is acknowledged that there are three pathways for the increase of suspended sediments during the construction and decommissioning phases relating to:

- The excavation of a tunnel reception pit to facilitate the recovery of the tunnelling machine
- Excavation to facilitate the seawater intake foundation installation
- HDD operations used in the installation of the brine outfall

DAERA Marine Strategy, Bathing Waters and Shellfish team recognise the inclusion of adjacent designated bathing and shellfish waters and the proximity to the proposed cavern location and the adherence to DAERA standing advice for any work that may impact the water environment.

Biodiversity

The department notes that Biodiversity has been considered within the Scoping Report Topic

Chapters 8 & 9:

- 8: Benthic Subtidal and Intertidal Ecology
- 9: Fish, Shellfish and Plankton Ecology

Biodiversity should be included as a standalone chapter in the proposed ES.

The embedded mitigation and monitoring throughout both the construction and operational phases are welcomed and further consideration should be given to responses from the following consultees (see Annex 2 for full consultation responses):

- RSPB – comments on potential impacts on ornithological features
- MFD Marine Wildlife – comments on the HRA and designated features and habitats

- DAERA MFD Marine Strategy, Inland and Sea Fisheries teams – comments on potential impacts on shellfish and fishery interests

Water quality / Air quality

The department notes the topic chapters considered in the Scoping Report relating to water and air quality and would welcome these as standalone chapters in the proposed ES.

- 19: Water Quality
- 21: Air Quality

DAERA MMAT team noted that the brine discharge during the construction phase is likely to have the most significant impact on coastal water quality.

MFD, Marine Strategy team acknowledge the inclusion of identified bathing waters at Browns Bay and Portmuck due to their proximity to the proposal and highlight that bathing water quality is particularly vulnerable to pollution. The team also note that the report has included designated shellfish waters in Larne Lough and the proximity to the proposed cavern locations. These designated sites contain commercial shellfish harvesting areas which must meet stringent standards so any development or subsequent works should not cause any negative impact on water quality.

The team highlight that care must be taken to minimise the impacts on the designated bathing and shellfish water sites, and as these sites are vulnerable to pollution, the applicant should ensure that appropriate measures are fully described and potential impacts considered in the proposed ES.

DAERA MFD Aquaculture reiterate the presence of commercial fisheries and aquaculture interests and risk of pollution on these interests. Fish populations and associated habitats are sensitive to reductions in water quality.

The applicant should consider and adhere to Standing Advice which is available at: Standing advice for development that may have an effect on the water environment (including groundwater and fisheries) | Department of Agriculture, Environment and Rural Affairs

Intertidal and subtidal benthic ecology

The department note the topic Chapter 8 '*Benthic, Subtidal and Intertidal Ecology*', in the Scoping Report. This should be considered and included as standalone chapter in the future ES.

The use of the Marine Evidence based Sensitivity Assessment (MarESA) tool to assess the sensitivity of benthic receptors is welcomed.

DAERA Marine Conservation & Reporting, Marine Wildlife are content with the conclusion for Annex I benthic habitats and welcome welcome sight of the following datasets/reports:

- Benthic Survey Reports
- New ongoing benthic survey data/reports

Their response also noted that it would be helpful to reference the hydrodynamic and dispersion modelling to demonstrate why no persistent changes could extend towards designated features.

It is also noted that the report (Page 24 4.2.3.4 of Scoping Report, dated October 2025) mentions that entrainment of smaller marine animals and plankton will occur and this still has to be assessed. Consideration should be made of any consequences for availability of prey to marine mammals and seabirds, as potentially food for fish could be impacted. Further survey data is underway to complete assessments for benthic and subtidal habitats. It would be helpful to confirm, using the brine dispersion and hydrodynamic modelling, that any benthic effects remain tightly confined to the outfall footprint with no wider depositional change expected in NI waters.

Marine habitats

MFD Marine Wildlife team are content with the conclusion for Annex I benthic habitats and potential impacts from the proposal *(also noted under 'Intertidal and subtidal benthic ecology')*

It is recognised that there are no European sites with relevant qualifying Annex I habitats that overlap with the project, so the reasoning that there were no further consideration of sites on this basis is accepted. The Maidens SAC is the closest designated site, 1km from project, with benthic qualifying interest features and so this has been considered in the assessments.

Refer to Biodiversity – Habitats – Annex I habitats layer in the Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs

It is noted that although the cavern construction activities occur entirely beneath the seabed, similarly during the operation phase, so there are no direct interactions with or pathway for impact on marine habitats. However, it is recognised that there is the potential for direct/indirect effects on sites designated for Annex I habitats as a result of impacts associated with increased salinity arising from the brine outfall.

The department welcomes the embedded mitigation measures for both the construction and operational phases and that the feasibility of these measures will be further scrutinised during consultation process as part of any future marine licence application.

Spawning areas, recreational and commercial fisheries and shellfisheries

It is noted that a range of potential impacts to commercial fisheries, fish and shellfish have been considered in the scoping report throughout both the construction and operational phases, and a buffer of 100km from the seawater intake and brine outfall has also been considered.
The department would welcome these topics are considered in standalone chapters in the ES.

The proposed area is a key migratory corridor for Diadromous fish such as Atlantic Salmon. The department notes the mention of embedded mitigation measures relevant to fish and shellfish, to include Environmental Management Plans (EMPs), real time monitoring methods and surveys of fishery locations throughout the construction phase, with further mitigation to include benthic grab, video and fishery surveys to monitor recovery at the site for two years following the completion of construction. (Chapter 9.7.2 of Scoping Report)

- *Commercial Fisheries*

DAERA MFD Sea Fisheries Inspectorate (including Aquaculture) highlights that Belfast Lough and Larne Lough both support commercial fisheries and aquaculture interests. Pollution, resulting from construction operations, in the marine environment has the potential to cause adverse impact to

these interests. The applicant must ensure adequate and appropriate pollution mitigation is in place to prevent the release of any deleterious material into their waters.

The applicant is reminded of Section 47 of the Fisheries Act (NI) 1966, which covers the applicant's responsibilities relating to penalties for pollution and the consequences of causing or permitting the release of any deleterious material into any waters.

The applicant should consider and adhere to the Standing Advice: DAERA Pollution Standing Advice

DAERA MFD Aquaculture recommended that the applicant is aware that Larne Lough supports commercial fisheries and aquaculture interests and that pollution, resulting from construction operations in the marine environment has the potential to cause adverse impact to these interests. Adequate and appropriate pollution mitigation should be in place prior to commencing construction operations.

Following a query by Mid and East Antrim during the scoping consultation *'Will there be a consultation with local aquaculture operators? We have Glenarm Organic Salmon operating not all that far away from the project area.'* RPS Tetra Tech noted that a stakeholder mapping exercise of all local aquaculture and fisheries groups has been completed. These stakeholders should continue to be engaged and this information should be included in any future licence application for reference.

- *Shellfisheries*

DAERA MFD Marine Strategy and Catchments Team acknowledged that the Scoping Report included the Designated Shellfish Waters in Larne Lough and recognises the proximity to the proposed cavern location.

The applicant must consider the risk of this proposal to impact Shellfish Water Protected Areas which are designated under The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017. These designated sites contain commercial shellfish harvesting areas which must meet stringent bacteriological and chemical standards as outlined in the Water Framework Directive (Classification, Priority Substances and Shellfish Waters) Regulations (Northern Ireland) 2015. Shellfish Water Protected Areas are particularly vulnerable to pollution and the applicant should ensure that appropriate measures are fully described in the ES.

Marine mammals

It is noted that there is a topic Chapter 10 '*Marine Mammals'*, in the Scoping Report dated October 2025.

The department welcomes embedded mitigation measures taking into consideration both the construction and operational phases noted in Chapter 10.7 of the Scoping Report. The appointment of an experienced MMO, submission of a comprehensive Environmental Management Plan (EMP) and monitoring programmes during construction and continual monitoring and surveys in the operational phase is welcomed.

The full response from DAERA MCR Marine Wildlife is noted in Annex 2 of this opinion and the comments provided should be fully considered prior to the submission of any future ES.

Ornithology

The Department note the inclusion of topic Chapter 7 *'Offshore and Intertidal Ornithology'* in the Scoping Report and this should remain as a standalone chapter in the ES. Consideration of terrestrial ornithology under topic Chapter 6 '*Terrestrial Ornithology'* of the Scoping Report is also welcomed to provide a full consideration of all ornithological features potentially impacted by this proposal.

The department note the inclusion of potential impacts to designated features and embedded mitigation for the construction phase to consider direct and indirect impacts.

We would refer to the DAERA marine map viewer for details on NI seabirds - Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs
RSPB have previously noted serious concerns with the potential impacts to ornithological features from this proposal. DAERA have summarised their response in this section, however the full detailed response to this scoping exercise is included in Annex 2 of this opinion and should be considered in full prior to the submission of any future ES.

For this scoping, RSPB highlighted that it is essential that sufficient information is contained in the proposed ES and HRA to ensure a robust and competent assessment of the potential impacts of the project on protected sites and species.

Previous concerns raised include-

- Potential impacts of the brine discharge site on designated sites and features due to its location within a highly designated area
- Potential impacts on the local benthic ecology and subsequent impacts on seabird feeding areas within Larne Lough and Portmuck
- The insufficiency of previous bird surveys to allow for any assessment of impacts on seabird species due to either being outdated or not carried out at the appropriate time of year
- Cumulative impacts on seabird species from underwater noise, brine discharge and seawater abstraction has not been adequately considered in previous assessments

    - *Surveys*

The Department welcomes the mention in Section 7.3.3 of the Scoping Report, regarding updated surveys ongoing at the time the scoping report was submitted, to include a Breeding Bird Survey, Coastal Bird Survey (Summer and Winter), Breeding Black Guillemot Survey, Overwintering Farm Bird Survey and Wetland Bird Survey have been commissioned and are underway.
RSPB also note that current survey data of foraging seabirds across the full breeding season, April to July inclusive, are essential to inform a robust impact assessment. Data from these surveys should be included in the proposed ES.

RSPB also welcome the updated bird surveys mentioned in Chapter 7.3.3 of the Scoping Report, however, have highlighted that without further details of methodology, comments cannot be provided on their suitability to inform the ES and HRA, and again reiterate the previous concerns on the timings of surveys.

It is also noted in the RSPB response that the new commissioned surveys listed in Chapter 7.3.3 of the Scoping Report, do not appear to include a repeat boat based transect surveys. The RSPB previously raised serious concerns regarding the timing of the 2019 boat-based surveys, which were carried out much too late in the seabird breeding season. We therefore recommend that new boat-

based surveys are undertaken to ensure that the Environmental Statement and HRA are informed by current and robust seabird foraging survey data.

The DAERA NED Ornithology team note the updated surveys completed as part of this project and are of the opinion that this new data will be sufficient to make an assessment on the impact of the proposal on ornithology features associated with the relevant designation

Designated sites

The proposed site of all three aspects of the project, including the one primary site and two ancillary sites lie within or adjacent to designated sites. The full list of designated sites is noted under Part 4, Annex 1 of this Scoping Opinion.

The Department welcomes the preparation and submission of the Likely Significant Effects (LSE) Habitats Regulation Assessment (HRA) Screening Report dated 19 September 2025, as well as a Marine Conservation Zone (MCZ) Screening dated September 2025 as part of the formal Scoping request for this proposal, submitted to the department in November 2025.

The Department would welcome an updated shadow Habitats Regulation Assessment (sHRA) in accordance with the Conservation of Habitats and Species Regulations (NI) 2017 as part of any future marine licence application package.

Invasive non native marine species

DAERA MFD Marine Wildlife team note that non-native species pathways have been scoped out via EIA. A statement is expected to be submitted as part of any proposed ES and licence application to confirm that standard marine biosecurity measures (vessel and equipment decontamination) will be secured.

The Marine Wildlife team note that the proposed ES would benefit from an explicit reference to NI's biosecurity measures and protocols:

- DAERA Marine Invasive Non-native Species Guidance
- Northern Ireland's Biosecurity protocols
- Check Clean Dry

Marine noise assessment

The Department notes the topic Chapter 11 *'Marine Noise'* in the Scoping Report (dated 2025).

The DAERA MFD Marine Wildlife team welcomed the assessments which have already been carried out to provide a baseline measurement of noise levels for the proposed work area. The team recommend that the assessment could be strengthened by briefly explaining why cumulative underwater noise remains unlikely to affect more distant SACs, and by linking the prey-availability reasoning more clearly to the fish and plankton baseline evidence.

Marine Wildlife also recommended that should any noise generating activities that qualify for logging in the JNCC Marine Noise Registry occur, then they could contribute to in-combination effects that take the North Channel SAC above target daily and/or seasonal noise footprint thresholds.

Guidance on noise management in harbour porpoise SACs (2020); New updated Effective Deterrent Ranges (2025) https://jncc.gov.uk/resources/2e60a9a0-4366-4971-9327-2bc409e09784 and the JNCC Marine Noise Registry https://mnr.jncc.gov.uk/ can be found at these links and should be reviewed and considered prior to the submission of a proposed ES.

The Department also recommends continual monitoring and embedded mitigation measures against the impacts of underwater noise during the construction phase of the project.

Flood risk

The Department note the inclusion of topic Chapter 20 *'Flood Risk'* in the Scoping Report (dated October 2025). This should be included as a standalone chapter in the proposed ES.

The location of the proposal may pose a coastal flooding risk. The flood risk assessment should be updated to reflect the impacts that climate change, most notably sea level rise and increased intensity of extreme storm events, may have upon this structure in the future. It is noted in Table 30.1 of the Scoping Report that Flood Risk has been scoped out for the Operation and Maintenance phase, however with future sea level rises and consequential risk of flooding and increased surface water run off due to Climate Change, post construction impacts should be considered in any proposed ES.

Consideration should be given to the strategic Flood Maps (NI), available through the Department for Infrastructure (DFI) online map viewer, to ensure all main sources of potential flooding have been assessed. Any assessments should fully explore the mitigation and management required to ensure that water draining from the proposed site is free from pollutants.

Historic environment

The Department notes the inclusion of the topic Chapter 24 '*Cultural Heritage and Archaeology'* in the Scoping Report dated October 2025.

Although Cultural Heritage and Archaeology has been scoped out as a standalone topic in the proposed ES, as noted in Chapter 24.6 of the Scoping Report, there should be clear representation of the evidence base supporting that decision in a proposed ES.

This evidence base should confirm the adequacy of existing survey coverage across all disturbance areas and describe standard mitigation measures, such as a Protocol for Archaeological Discoveries, to manage residual risk. In that context, the following matters should be addressed within the Environmental Statement (ES) in support of that position.

The full response from DAERA Marine Conservation and Reporting, Marine Archaeology team in Annex 2 should be fully considered prior to the submission of any proposed ES, with further consideration of the following:

- Baseline Coverage
- Consideration of Potential Effects
- Mitigation Measures

Pollution prevention

The Department note the significant risk of marine pollution being introduced into the marine environment through the project lifecycle from construction activities to create the primary and ancillary aspects of the proposal through to the operational phase.

There should be strict adherence to DAERA's Standing Advice on Pollution Prevention Guidance, Discharges to the Water Environment, and Abstractions and Impoundments, which are available at https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries

Consideration should also be given to Guidance for Pollution Prevention (GPP) guidance documents which can be found at the NetRegs site: https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents and DAERA standing advice on pollution prevention: DAERA Standing Advice - WTR - Pollution Prevention Guidance - Sept 2022 Final.pdf

The Department recommends continual mitigation measures including the submission of a Construction Environmental Management Plan (CEMP) / Construction Method Statement (CMS) for agreement prior to commencement of works.

The applicant should engage with the Department regarding necessary review of any existing permissions or applications for new permissions in relation to the ancillary sites where the saltwater intake and brine outfall are located.

Marine litter

The Department note the topic Chapter 25 '*Waste*' in the Scoping Report dated October 2025.

Marine litter can cause significant impacts to marine ecosystems, including direct damage to wildlife through entanglement, entrapment and/ or ingestion and can also destroy coastal habitats, by interfering with biological production and smothering of the seabed. It is recommended that consideration is given to how litter will be managed through the construction phase to prevent this entering the marine environment.

Further information can be found in the Marine Litter Standing Advice: DAERA Standing Advice - Marine Litter.pdf Furthermore, The Draft Marine Plan for Northern Ireland states that Public authorities must consider the potential risk of litter entering the marine area as a result of proposals. Where a proposal creates the potential for litter to enter the marine area, a Public Authority may require the proposer to demonstrate:

- how the risk has been considered;
- appropriate measures to minimise the risk.

Marine Information on how this is to be achieved is set out in paragraphs 187 to 199 of the Draft Plan for Northern Ireland: Marine Plan for NI

Navigation and safety

The Department note the topic Chapter 13 '*Shipping, Navigation and Safety'* in the Scoping Report dated October 2025. This should be a standalone chapter in the proposed ES and should supply

detail on the possible impact on navigational issues for both commercial and recreational craft in both the construction and operational phases, specifically:

• Collision Risk
• Navigational Safety
• Visual intrusion and noise
• Risk Management and Emergency response
• Marking and lighting of site and information to mariners
• Effect on small craft navigational and communication equipment
• The risk to drifting recreational craft in adverse weather or tidal conditions
• The likely squeeze of small craft into the routes of larger commercial vessels
• Deviation from established vessel routes and areas
• Cumulative and In-Combination Effects

The Department recognises that the location of the primary Islandmagee Gas Storage Facility at the mouth of Larne Lough and North Channel is the main navigation channel into the Port of Larne, and would agree with the recommendation from the Maritime & Coastguard Agency (MCA) to include a Shipping and Navigation Risk Assessment (NRA) and ensure it covers both the construction and operational phases of the project.

Consideration should be given to the response from Maritime and Coastguard Agency MCA), who noted that the project is located in a Statutory Harbour Authority (SHA) – Port of Larne, who are responsible for the safety of navigation within their waters. It was also noted that the intake and outfall works are located in the North Channel, therefore fall outside of SHA limits, meaning that the safety of navigation falls to the MCA.

To address the ongoing safe operation of the marine interface for any project works in SHA jurisdiction, the developers should refer to the Ports and Marine Facilities Safety Code (PMSC) and its Guide to Good Practice. A robust Safety Management System (SMS) should be developed with consultation with the SHA for the project under this code.

<u>Seascape, landscape and visual assessment</u>

The Department notes the topic Chapter 25, *'Seascape, Landscape and Visual Impact'* and that consideration has been given to all phases of the proposal, taking into account a 5km study area.

Seascape is a core policy of the Draft Marine Plan for Northern Ireland and states that '*public authorities must consider the potential impact from proposals on seascape, taking account of the existing character of an area, how highly is it valued, and its capacity to accommodate change'.*

It is noted that the proposal is set within potentially sensitive seascape character areas and consists of several elements across a wide geographic area, due to the proposals location within the marine environment, under the water level, the visual impacts post construction are limited however there is potential for visual impacts during the construction phase, which whilst temporary require assessment. Terrestrial impacts have been addressed under the extant Planning Permission Ref F/2010/0092/F

The Department is in agreement that a proposed Landscape and Visual Impact Assessment (LVIA), to identify significant effects during the construction and decommissioning stages, is required and is noted in Chapter 26.9 of the Scoping Report dated October 2025.

Mitigation and monitoring

The proposed ES should consider and include, but is not exhaustive, the following measures:

- Continuation of embedded mitigation measures'
- Continuous monitoring plans for marine biodiversity, ornithology, water quality and fishery and aquaculture interests;
- Regular reporting and engagement with relevant bodies to report findings and addressing concerns;
- Adaptive management strategies to address unforeseen issues and regular review of processes;

Cumulative impacts

It is noted in topic Chapter 3.1.5 '*Cumulative Impacts'* of the Scoping Report dated October 2025, that consideration will be given to cumulative effects of adjacent or nearby developments and its impact on seascape, landscape and visual resources.

Cumulative impacts and inter relationships should be presented within the proposed ES as a standalone chapter. It should also outline the main factors which would have cumulative / inter-relationship impacts. The ES should explain the interrelationship between each of the key considerations outlined in this Scoping Opinion, not just adjacent or nearby developments.

MFD Marine Wildlife team note that a short statement on cumulative marine pressures would be welcomed to confirm the absence of any overlapping pathways, to align with DAERA's Marine Coastal Zone (MCZ) assessment requirements.

RSPB also noted in their response that the cumulative impacts on seabird species from underwater noise, brine discharge and seawater abstraction has not been adequately considered in previous assessments. The RSPB consultation response in Annex 2 of this Scoping Opinion should be fully considered prior to submission of a proposed ES.

The Port of Larne commented that the assessment should consider other existing and planned marine activities within Larne Lough and adjacent waters to ensure that cumulative impacts on navigation and port operations are fully understood. This should also be considered prior to the submission of a proposed ES.

Standing advice

DAERA MFD Marine Conservation & Reporting, Marine Wildlife Team advised that the proposed ES would benefit from an explicit reference to NI's biosecurity measures and protocols:

- DAERA Marine Invasive Non-native Species Guidance
- Northern Ireland's Biosecurity protocols
- Check Clean Dry

The applicants attention is also drawn to the following links which provide standing advice to be considered:

- DAERA Pollution Standing Advice
- DAERA Marine Litter Standing Advice
- DAERA Marine Wildlife Disturbance Guidance
- Decisions affected by marine policy - authorisation decisions
- DAERA Standing advice for development that may have an effect on the water environment (including groundwater and fisheries)
- DAERA Culverting Standing Advice
- DAERA Discharges to the water environment Standing Advice
- DAERA Sustainable Drainage Systems Standing Advice

The applicant is advised that any planning application based on the information provided should be made to the local planning authority, Mid and East Antrim Borough.

Other issues for consideration

- Surveys and Data

DAERA MFD Marine Wildlife would welcome sight of the following datasets/reports as part of any proposed ES and licence application:

- Marine Environmental Conditions Update Report
- Islandmagee Gas Storage Facility Brine Dispersion Modelling
- Benthic Survey Reports
- New ongoing benthic survey data/reports

Comments on ornithological feature surveys have been included under the key consideration topic 'Ornithology' as well as Annex 2, of this Scoping Opinion.

- Habitats Regulations Assessment (HRA) LSE Assessment

RSPB provided comments on the strength and level of information of the assessment of the likely significant effects on all Larne Lough SPA interest features, as well as consideration of the features of Larne Lough Ramsar Wetland site and East Coast (NI) Marine potential SPA (pSPA). The full details of the RSPB concerns are included in the consultee response section in Annex 2 of this Opinion. DAERA Marine Licensing have taken note of these comments by RSPB and any future HRA submitted to the department as part of a marine licence application package will be assessed through the statutory consultation process.

DAERA MFD Marine Wildlife team agreed with the screening of SACs for Annex II marine mammals with potential connectivity and that the pathways identified and retained, (construction noise, vessel noise, collision risk, brine-related behavioural responses and prey-availability changes), should be taken forward to Appropriate Assessment.

The team also noted that the assessment could be strengthened by briefly explaining why cumulative underwater noise remains unlikely to affect more distant SACs, and by linking the prey-availability reasoning more clearly to the fish and plankton baseline evidence. This should be considered for the proposed ES.

- Decommissioning

We note that potential impacts of the decommissioning phase have been mentioned throughout the proposed chapters in the Scoping Report dated October 2025. The Department requires this phase to be considered within the proposed ES and within any HRA and that further environmental assessment and relevant consents for decommissioning will be required in the future.

MFD Marine Wildlife also recommended that decommissioning is addressed as thoroughly as possible prior to construction, acknowledging that further assessment work can be done at the time. The potential environmental impacts associated with decommissioning need to be identified clearly in advance so that there are assurances that there will be no significant issues down the line.

- Public Engagement

Whilst not a legislative requirement of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), the applicant is encouraged to carry out a pre application public and industry engagement exercise in relation to the proposal and to include within their package of information, details of any events carried out, comments received, responses to those comments and any changes or mitigations proposed to address any comments.

ANNEX 2. Full list of Scoping Consultation Responses

This annex contains the full consultee responses from the Scoping Consultation carried out by DAERA Marine Licensing in March 2026.

List of Consultees providing a response	List of Consultees **not** providing a response
- DAERA MFD Monitoring and Assessment Team - DAERA MFD Marine Strategy (Bathing Waters & Shellfish Team) - DAERA MFD Sea Fisheries Inspectorate (including Aquaculture) - DAERA MFD Fish Health Inspectorate - DAERA MFD Marine Conservation & Reporting - Marine Wildlife - DAERA MFD Marine Conservation & Reporting - Marine Archaeology - DAERA MFD Marine Conservation & Reporting - Coastal Processes - DAERA MFD Marine Conservation & Reporting - Marine Wildlife - Sea Bird Conservation advisor - DAERA NIEA Resource Efficiency Division Water Catchment Unit (WCU) Planning Team - DAERA, NIEA Natural Environment Division (NED) Species Team - DAERA, NIEA Natural Environment Division (NED) Freshwater Team - DAERA, NIEA Natural Environment Division (NED) Wildlife Team - DAERA, NIEA Natural Environment Division (NED) Ornithology Team - DAERA, NIEA Natural Environment Division (NED) Earth Science Team	- DAERA NIEA Natural Environment Division (NED), Conservation Designation and Protections Branch (CDP) - DAERA, NIEA Natural Environment Division (NED) Habitat Survey Team - DAERA, NIEA Natural Environment Division (NED) Evidence Team - DAERA, NIEA Natural Environment Division (NED) Biodiversity Team - DAERA, NIEA Natural Environment Division (NED) Invasive Species Team - UK Hydrographic Office - AFBI - The Crown Estate (NI Contact) - DfE

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- DAERA MFD Inland Fisheries - NIEA RED WMU Industrial Consents - RSPB - Mid & East Antrim District Council (formerly Larne, Carrickfergus & Ballymena) - The Commissioners of Irish Lights - Maritime & Coastguard Agency - Port of Larne	

EIA Scoping Responses	
Consultee	**DAERA MFD Monitoring & Assessment Team**
All environmental topics have been appropriately screened. The brine discharge, including the associated plume during the construction phase is likely to have the most significant impact on coastal water quality, plankton communities, benthic ecology, and fishes.	
Consultee	**DAERA MFD Marine Strategy (Bathing Waters & Shellfish Team)**
Having read through the EIA scoping report, Marine Strategy and Catchments acknowledges that the two identified bathing waters, Browns Bay and Portmuck have been included. We would like to reiterate the following information ahead of the ES. Bathing waters are identified under The Quality of Bathing Water Regulations (Northern Ireland) 2008, and protected under The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017. The identification of these bathing water sites reflects the high amenity and tourism value of the area. Water quality must be protected in this area to ensure public health standards are achieved for bathers and water users. Bathing water quality is particularly vulnerable to pollution. Care must therefore be taken to minimise the impacts on this identified site and the applicant should ensure that appropriate measures are fully described in the ES. Marine Strategy and Catchments acknowledge the EIA report has included the Designated Shellfish Waters in Larne Lough and recognises the proximity to the proposed cavern location. We would like to reiterate the following information ahead of the ES: The Department asks that any developments or subsequent work, in and around identified shellfish waters, should not cause any negative impacts on the water quality. The applicant must consider the risk of this proposal to impact Shellfish Water Protected Areas	

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which are designated under The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017. These designated sites contain commercial shellfish harvesting areas which must meet stringent bacteriological and chemical standards as outlined in the Water Framework Directive (Classification, Priority Substances and Shellfish Waters) Regulations (Northern Ireland) 2015.

Shellfish Water Protected Areas are particularly vulnerable to pollution and the applicant should ensure that appropriate measures are fully described in the ES.

Adherence to DAERA Standing Advice, for any work that may impact the water environment in order to minimise impacts on water quality, therefore must also be ensured and fully described in the ES.

We can confirm that we wish to be engaged if and when an application is received for this proposal.

Consultee	**DAERA MFD Sea Fisheries Inspectorate**

For the proposed area identified for the location of the gas storage caverns beneath Larne Lough, there is minimal direct interaction with commercial fishing activity. The caverns are located approximately 1,350 to 1,500 metres below the seabed and no targeted commercial fisheries are known to operate within the footprint of the proposed cavern area. Consequently, significant impacts on fishing operations within Larne Lough are considered unlikely. The project documentation also notes that the cavern construction itself will be undertaken from an onshore well pad, with no routine marine intervention required above the cavern locations.

In contrast, the proposed seawater intake and brine outfall infrastructure located off the Portmuck/Castle Robin Bay area lies within a coastal zone that is known to support static gear fisheries, primarily targeting lobsters and various species of crab.

These fisheries typically operate using pots and creels deployed seasonally throughout the area. As such, consideration should be given within the Environmental Impact Assessment to potential temporary and long-term effects on these fishing activities, including:

Temporary exclusion from fishing grounds during construction and installation works – prior communication with fishers who have a track record of fishing in this area to be notified.
Potential displacement or relocation of static fishing gear - prior communication with fishers who have a track record of fishing in this area to be notified.
Navigational and operational constraints associated with construction vessels and safety zones –
Potential impacts on shellfish species and their habitats arising from seabed disturbance, increased suspended sediments, underwater noise, seawater abstraction and hypersaline brine discharge.
Any long-term restrictions on fishing activity associated with the presence and maintenance of the intake and outfall infrastructure.

It should also be noted that there is a fisheries representative group for fishers in this area known as - North Coast Lobster Fisherman's Association.

The Environmental Statement should therefore include a detailed assessment of commercial fisheries within the Portmuck area, supported by up-to-date consultation with local fishermen and representative fisheries organisations, to quantify the importance of the area to the lobster and crab fishery and to identify any appropriate mitigation measures required to minimise impacts on established fishing activities.

Consultee	**DAERA MFD Fish Health Inspectorate**

The Fish Health Inspectorate has reviewed the information provided in regard to the above consultation. At this stage we do not require any additional information to be submitted by the applicant in relation to Fish Health implications from the proposed activity.

Consultee	**DAERA MFD Marine Conservation & Reporting - Marine Wildlife**

Marine Conservation

MCZ assessment

The Marine Conservation Branch is content that the MCZ Screening Report gives a fair and proportionate review of Northern Ireland's MCZ network in relation to the proposed marine works. Based on the locations of the seawater intake and brine outfall, none of the NI MCZs fall within a spatial range for direct or indirect water-borne effects. Rathlin MCZ (>51 km) and Strangford Lough MCZ (>30 km) sit well outside the 10 km ZoI for benthic or geomorphological effects, and black guillemot foraging ranges (~9 km) do not intersect with the project area or its marine operations.

That said, it would strengthen the assessment to reference the supporting hydrodynamic and marine water-quality evidence developed. This would help close off any questions around wider water-column connectivity and confirm that salinity changes, suspended sediment, drilling fluids, or accidental releases cannot be transported at ecologically meaningful concentrations toward any MCZs.

A short statement on cumulative marine pressures would also be welcomed, even if just to confirm the absence of any overlapping pathways, to align with DAERA's MCZ assessment requirements.

Subject to these minor clarifications, we are content with the screening outcome and agree that a stage 1 MCZ assessment is not required.

HRA (Likely Significant Effects (LSE) Screening Report)

We are content with the conclusion for Annex I benthic habitats. However, it would be helpful to reference the hydrodynamic and dispersion modelling to demonstrate why no persistent changes could extend towards designated features.

For Annex II marine mammals, we agree with the screening of SACs with potential connectivity. We also agree with the pathways identified and retained (construction noise, vessel noise, collision risk, brine-related behavioural responses and prey-availability changes) that should be taken forward to AA. The assessment could be strengthened by

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briefly explaining why cumulative underwater noise remains unlikely to affect more distant SACs, and by linking the prey-availability reasoning more clearly to the fish and plankton baseline evidence.

Page 17 4.1.5.1 Initial Identification of Sites - The Proposed East Coast (Northern Ireland) Marine SPA was included last time in the HRA.

Page19 Table 4-2: European sites designated for ornithological features screened into the HRA - Should Larne Lough Ramsar be listed here too? (Table 2-1 Criterion 2. It probably doesn't change the list of species considered.

Page 24 4.2.3.4 Effects on marine mammal receptors from entrainment and impingement associated with the operation of the intake (construction/decommissioning phase) Page119 of the EIA mentions that entrainment of smaller marine animals and plankton will occur. We note that this still has to be assessed and will welcome consideration of any consequences for availability of prey to marine mammals and seabirds, as potentially food for fish could be impacted.

Non-native species pathways have been scoped out via EIA, but we would expect a statement confirming that standard marine biosecurity measures (vessel and equipment decontamination) will be secured.

Subject to these points, we are content with the overall screening, the features identified, and the pathways taken forward to Appropriate Assessment.

Some minor corrections that could be applied to the HRA are noted below:

Page 12 Cetaceans - Ten European sites designated for harbour porpoise were identified to be taken forward for the determination of LSE (Table 4-1). There appear to be nine in Table 4.1

Page19 Table 4-2: European sites designated for ornithological features screened into the HRA - Should Larne Lough Ramsar be listed here too? (Table 2-1 Criterion 2. It probably doesn't change the list of species considered.

Page 25 4.2.3.7 Disturbance to Annex II seals at haul-out sites (construction/decommissioning phase) – The nearest seal haul-out is at Muck Island (1.6km), not The Maidens (9km). However, the case could still be made that this is far enough away to avoid significant disturbance (only small numbers present).

Page 39 Minor typo, it says "harbour porpoise" in part of the text and should say "grey seal"

Page 56 4.3 Approach to the In-Combination Assessment

Just noting that should any noisy activities that qualify for logging in the JNCC Marine Noise Registry occur, then they could contribute to in-combination effects that take the North Channel SAC above target daily and/or seasonal noise footprint thresholds. Links to references are provided below.

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Guidance on noise management in harbour porpoise SACs (2020); and New updated Effective Deterrent Ranges (2025) https://jncc.gov.uk/resources/2e60a9a0-4366-4971-9327-2bc409e09784

JNCC Marine Noise Registry https://mnr.jncc.gov.uk/

EIA

For benthic and subtidal habitats, we are satisfied with the pressures and effects scoped in and the use of MarESA. We note that further survey data is underway to complete assessments. It would be helpful to confirm, using the brine dispersion and hydrodynamic modelling, that any benthic effects remain tightly confined to the outfall footprint with no wider depositional change expected in NI waters.

For marine mammals, the EIA correctly scopes in underwater noise, vessel activity and potential prey-availability changes, given the proximity to North Channel SAC and The Maidens SAC. It would be useful to better link any prey-availability reasoning to the fish and plankton evidence base. We welcome proposed mitigation measures.

The EIA would benefit from an explicit reference to NI's biosecurity measures and protocols:

- DAERA Marine Invasive Non-native Species Guidance
- Northern Ireland's Biosecurity protocols
- Check Clean Dry

We also welcome the seascape assessment.
Subject to these clarifications, we are content that the topics relevant to marine conservation have been appropriately identified and scoped.

Other comments

We would welcome sight of the following datasets/reports:

- Marine Environmental Conditions Update Report
- Islandmagee Gas Storage Facility Brine Dispersion Modelling
- Benthic Survey Reports
- New ongoing benthic survey data/reports

Some minor corrections that could be applied to the HRA are noted below:

Page 130 - Aerial thermal imaging survey of seals in Northern Ireland 2017-2018 is referenced; note that DAERA can provide access to the report covering the 2024 survey.

Page132 - To date more than 24 species of cetacean have been recorded in Irish waters. Irish Whale and Dolphin Group website says at least 26 species. More than two species of seal have been recorded in Ireland so you could just add that this excludes vagrant species.

Page 140 Risso's dolphin – Minor problem with paste and copy as *minke whale* is mentioned in the section.

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Page 141 - A lack of sightings of grey seal in winter is also possibly related to lack of survey effort during those months. Additional information is available in later aerial survey reports for Grey Seal covering 2021 and 2024. During DAERA cetacean watches from Portmuck there are occasional sightings of seals. You are welcome to contact DAERA for any recent information.

Page 142 Harbour Seal - Larne Lough should not be described as a breeding site based on sightings in August and September (moult period). As stated in an earlier paragraph, pups are born in June and July so evidence would need to come from those months. (Harbour Seal are an ASSI feature at The Maidens.)

Page 146 – We wish to check if the Scottish site for Harbour Seals at South-East Islay Skerries SAC, approx. 90km should be added to Table 10.2? It exceeds 50km so can be excluded on that basis, but this seems to be a less precautionary approach than that used for other marine mammals. 50km range scopes in other Seal MUs for Harbour Seal so would that bring in South-east Islay Skerries SAC?

Page 146 10.5 states "Further environmental assessment and relevant consents for decommissioning will be required in the future." We recommend that decommissioning is addressed as strongly as possible prior to construction, acknowledging that further assessment work can be done at the time. The potential environmental impacts associated with decommissioning need to be identified clearly in advance so that there are assurances that there will be no significant issues down the line.

Page 147 Table 10-3 - It would help if "underwater noise" was added to the title of first cell.

Page 151 Table 10-3 – The closest seal haul-out is Muck Island, not The Maidens.

Page 155 - JNCC Guidance for Harbour Porpoise SACs was updated in 2025 with revised Effective Deterrent Ranges. *Guidance on noise management in harbour porpoise SACs (2020); and New updated Effective Deterrent Ranges (2025)*
https://jncc.gov.uk/resources/2e60a9a0-4366-4971-9327-2bc409e09784

Consultee	**DAERA MFD Marine Conservation & Reporting - Marine Archaeology**

From the perspective of the marine historic environment, there is no objection in principle to the proposed scope of the Environmental Impact Assessment.

Although Cultural Heritage and Archaeology have been scoped out as a standalone ES topic, the Environmental Statement should nevertheless clearly present the evidence base supporting that decision, confirm the adequacy of existing survey coverage across all disturbance areas and describe standard mitigation measures, such as a Protocol for Archaeological Discoveries, to manage residual risk. In that context, the following matters should be addressed within the Environmental Statement (ES) in support of that position.

Baseline Coverage
The ES should explicitly confirm that existing geophysical and desk-based data adequately cover all seabed areas subject to new disturbance, including HDD punch-out locations and seabed infrastructure footprints. Where gaps in coverage are identified,

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proportionate additional assessment (for example targeted data review or gap analysis) should be undertaken to address these.

Consideration of Potential Effects
In support of scoping archaeology out of the ES, the ES should clearly set out how the potential for previously unrecorded or buried archaeological remains has been considered, including indirect effects such as localised scour or sediment redistribution around permanent seabed structures and demonstrate how any residual risk would be appropriately managed.

Mitigation Measures
Although Cultural Heritage and Archaeology have been scoped out on the basis that significant effects are unlikely, the ES should nevertheless describe the application of standard marine archaeological safeguards to manage residual risk, including a Protocol for Archaeological Discoveries (PAD), clear reporting procedures for unexpected finds and proportionate archaeological monitoring where appropriate.

Subject to the above, the proposed EIA scope is considered acceptable from a marine historic environment perspective. These comments are offered on a precautionary and proportionate basis to support, and provide clarity around, the scoping of the Environmental Statement.

We would welcome continued engagement should an application be submitted.

Consultee	**DAERA MFD Marine Conservation & Reporting - Coastal Processes**
After assessing the Coastal Processes chapter of the EIA scoping report, we note that no reference is made to the landfall elements of this facility. We note that these elements may impact upon local coastal processes and as such should be scoped in.	

Consultee	**DAERA MFD Marine Conservation & Reporting – Seabirds**
The Marine Conservation Team is unable to provide comments relating to seabirds on this occasion due to the absence of specialist ornithological capacity within the team. It may be appropriate to seek advice from DAERA NIEA/NED Ornithologists, who have previously provided input on seabird matters. **The applicant should take account of comments above in relation to seabirds*	

Consultee	**DAERA MFD Aquaculture Fish Health Inspectorate**
The Fish Health Inspectorate has reviewed the information provided in regard to the above consultation. At this stage we do not require any additional information to be submitted by the applicant in relation to Fish Health implications from the proposed activity.	

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Consultee	DAERA NIEA Resource Efficiency Division Water Catchment Unit (WCU) Planning Team
Water Catchment Unit (WCU) Development Management Team (DMT) notes the information contained in Section 1.1.3 (Scope of Proposed EIA) of the Environmental Statement: T*errestrial elements of the facility are excluded in the grounds that they have previously been subject to EIA and are fully consented under the 2012 Planning consent.* On this basis, WCU DMT would make the following recommendations: We note that the project requires Water Order Consent (under the terms of the Water (Northern Ireland) Order 1999) and Abstraction Licences (under the terms of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006). The applicant should engage with the Department regarding any necessary review of any existing permissions or applications for new permissions. The Water Regulation Team can be contacted at industrialconsents@daera-ni.gov.uk and the DAERA Abstractions & Impoundments Licensing Team at ail@daera-ni.gov.uk The applicant should be aware that there is no guarantee that the relevant permits / consents will be reviewed / granted by the Department, as a number of site-specific factors need to be taken into account in assessing the suitability of the proposed discharges / abstractions. The applicant should refer and adhere to the precepts contained in DAERA Standing Advice on Discharges to the Water Environment, Pollution Prevention Guidelines, Abstractions and Impoundments, and Commercial or Industrial Developments, available at https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries	

Consultee	DAERA, NIEA Natural Environment Division (NED), Species Team
No concerns from Species Team	

Consultee	DAERA, NIEA Natural Environment Division (NED), Ornithology Team
The ornithology team have reviewed the EIA scoping report and LSE Screening report for this proposal. We are content with the updated surveys completed as part of this project and are of the opinion that this new data will be sufficient to make an assessment on the impact of the proposal on ornithology features associated with the relevant designations.	

Consultee	DAERA, NIEA Natural Environment Division (NED), Freshwater Team
I have gone through the material related to this and I see no Freshwater concerns.	

Consultee	DAERA, NIEA Natural Environment Division (NED), Wildlife Team
It's very unclear what we are being asking to comment on; this project has marine and terrestrial elements, clearly the teams being consulted primary concerns are the terrestrial	

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elements, which all seem to have been screened out within the documents supplied as they are covered by a terrestrial planning consideration? WLT would have concerns about several areas of the terrestrial plans if not properly assessed.	
Consultee	**DAERA, NIEA Natural Environment Division (NED), Earth Science Team**
I've read through the relevant scoping documents for this proposal, and I do not believe any additional information is required for terrestrial geoconservation.	
Consultee	**DAERA MFD Inland Fisheries**
Inland Fisheries notes the reason for consultation and is content that the EIA Scoping document, Islandmagee Gas Storge Facility – HRA - Likely Significant Effects (LSE) Screening Report addresses the relevance of the Scoping Opinion under Schedule 4 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), in respect to an Environmental Statement (ES) to be supplied for the above proposal. Inland Fisheries notes the criteria base for the conclusion that Annex 2 diadromous Species can be scoped out of the requirement to be included. It should be noted that the arbitrary distance of 100km radius for sites designated for such species does not mean they do not have the potential to be present in the vicinity of the marine element of this proposal, Inland Fisheries do accept however that potential impacts are likely to be localized and such species are mobile and likely vacate the impacted area. It should also be noted that these migratory species may originate from within other jurisdictions, and we would recommend that any transboundary consultees including the Loughs Agency are consulted.	
Consultee	**NIEA RED Water Catchment Unit (WCU) Industrial Consents**
In view of the fact that a Discharge consent and an Abstraction licence will be required, in addition to the marine licence, for the proposed development, Water Regulation team wish to be engaged when applications are received. The applicant will need to submit suitable applications for both these additional authorisations, to Water Regulation, which they have indicated will be the case in due course. The ES will need to contain sufficient detail to enable the effective assessment of impacts on the water environment arising from both the discharge and the abstraction activities.	
Consultee	**RSPB**
The RSPB has previously raised serious concerns regarding the proposed Islandmagee Gas Storage Facility (LGSF) and its potential to impact a wide range of species, including those forming part of sites designated for their international and national importance for wildlife. In addition, we have raised questions about the justification for the IGSF, as well as the compatibility of a scheme that would continue our dependency on fossil fuels, when considered against the UK's net zero targets and the associated	

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transition to low carbon energy systems. (For full details of our previous concerns, please see the RSPB's response to the Islandmagee Gas Storage abstraction and discharge review applications (TC 041/20 & AIL/2012/0033) dated 31 January 2021. Copy available from the RSPB on request.)

We note that the current consultation relates to new impact assessments – including Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) – of the marine elements of the IGSF, in order to inform new applications for a Water Order Consent, Abstraction Licence and Marine Construction Licence. This follows on from the previous Judicial Review and successful subsequent appeal against the earlier granting of marine consents for the scheme.

The RSPB has previously raised the following key concerns concerning the ecological impacts of the marine elements of the LGSF:

• The site of the brine discharge is within an area that is highly designated for nature protection, being within the East Coast (NI) Marine proposed Special Protection Area (SPA) and the North Channel Special Area of Conservation (SAC) and is functionally linked to a number of sites including Larne Lough SPA, Ramsar and Area of Special Scientific Interest (ASSI), Portmuck ASSI, The Gobbins ASSI and the Maidens SAC. Potential impacts of the proposals must be assessed on the interest features of each of these sites, as well as other priority wildlife in the area.

• The discharge of the hypersaline brine could result in impacts on the local benthic ecology and, subsequently, on feeding areas used by terns and other seabirds which breed in Larne Lough and Portmuck, and form part of the above listed designated sites. Even small-scale changes in salinity could have an impact on the prey of protected bird species, and therefore careful consideration must be given to the assessment of such effects.

• The previous bird surveys provided by the applicant were insufficient to allow any assessment of impacts on seabird species, as they were either out of date (surveys over five years old) or were not carried out at the appropriate time of year. In particular, current survey data of foraging seabirds across the full breeding season (April to July inclusive) are essential to inform a robust impact assessment.

• The impact on seabird prey species from the combination of underwater noise from construction, brine discharge and the seawater abstraction has not been adequately considered in previous assessments.

It is essential that sufficient information is contained within the new Environmental Statement and HRA in order to make a robust and competent assessment of the above potential impacts of the project on protected sites and other priority species within this sensitive area, and that the assessments do not repeat previous failings (including those raised by the RSPB and others during the Judicial Review and subsequent appeal in relation to the previous marine consents).

Environmental Impact Assessment (EIA) Scoping Report (October 2025)

We note that, other than the updated vantage point and dawn/dusk surveys from 2023/24, all of the ornithological data summarised in the Marine Consents Application EIA Scoping Report is already over five years old. Section 7.3.3 states that: "*A Breeding Bird Survey, Coastal Bird Survey (Summer and Winter), Breeding Black Guillemot Survey, Overwintering Farm Bird Survey and Wetland Bird Survey have been commissioned and are underway; however, data were not available at the time of writing to include in this Scoping Chapter.*"

These new surveys are welcome, but without further details on their methodology we cannot comment on their suitability to inform the EIA and HRA. We would however like to highlight our previous concerns regarding the timing of surveys. We also note that the new commissioned surveys, listed above, do not appear to include a repeat boat based transect surveys. The RSPB previously raised serious concerns regarding the timing of the 2019 boat-based surveys, which were carried out much too late in the seabird breeding season. We therefore recommend that new boat-based surveys are undertaken to ensure that the Environmental Statement and HRA are informed by current and robust seabird foraging survey data.

Notwithstanding the commissioning of additional bird surveys, with so much of the remaining ornithological data being relied upon significantly beyond the recommended lifespan for ecological assessment baseline data (https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf), we question whether the contemporary data will be sufficient to inform a robust assessment for such a dynamic environment, particularly for a scheme of this nature with such wide-ranging potential impacts.

In advance of the updated survey data and impact assessments, we consider that the Offshore and Intertidal Ornithology: Target Species Accounts presented in Appendix A of the EIA scoping report, and the individual species impact conclusions presented therein, are premature and largely unhelpful at this stage in the impact assessment process. We recommend that limited weight is therefore placed on the information contained in Appendix A at the current time.

Habitats Regulations Assessment (HRA) – Likely Significant Effects (LSE) screening report

We consider that the HRA LSE screening report (October 2025) presents a weak and unjustified assessment of the likely significant effects on Larne Lough SPA interest features, relying on baseless assumptions such as habituation of birds to unquantified noise impacts and reliance on incomplete contemporary survey data concerning bird distribution and movements in the affected area. As a result, the report recommends that all SPA features can been screened out in respect of all identified impact pathways, with the single exception of impacts from noise and visual disturbance during construction/ decommissioning on Common Tern.

We firmly disagree with this assessment and consider that, as competent authority under the Conservation (Natural Habitats etc.) Regulations (Northern Ireland) 1995

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(the Habitats Regulations), DAERA should ensure that sufficient information is provided by the applicant to allow for a full appropriate assessment of the identified impact pathways (alone and in combination) on all SPA interest features, including Pale-bellied Brent Goose, Sandwich Tern, Roseate Tern, Common Tern and Mediterranean Gull.

In addition, HRA must also be undertaken in respect of the features of the Larne Lough Ramsar Wetland site and East Coast (NI) Marine potential SPA (pSPA). The screening assessment current fails to reference these sites and their additional features, despite qualifying species of these designated sites having been scoped into the EIA assessment (see Table 7.12). This is a significant omission which needs urgently addressing to ensure that DAERA can fulfil its responsibilities as competent authority.

Consultee	**Mid & East Antrim District Council (formerly Larne, Carrickfergus & Ballymena)**

Council has now reviewed the relevant documentation. We would like to provide the following feedback, developed by Ryan Hack (Harbour Master):

1. On page 198: MEA (Harbours and Marinas) are not listed as a consultee for Navigational Risk Assessments. As we have commercial fishermen in the area who berth with us, as well as our own berth holders and visitors transiting the area in a leisure capacity I think it is important that we are at least consulted.
2. On page 212: Section 14.4.4 – Licenced Aquaculture Sites – will there be a consultation with local aquaculture operators? We have Glenarm Organic Salmon operating not all that far away from the project area.
3. On page 220: Section 15 – Material Assets – Infrastructure and Other Users – will there be a consultation involving MEA as well as local users and stakeholders?
4. On page 264: Section 19.4.2.3 – Bathing Waters – will there be a consultation involving MEA as well as local users and stakeholders?
5. On pages 319: Table 23-3 and page 414: table 30.1 – Suspended sediment has been scoped out of the construction, deconstruction and operational phases of the project. Can we have justification of this? Or evidence to back up why it has been scoped out? Any additional suspended sediment has the potential to silt up nearby places like Ballylumford Harbour and Portmuck Harbour. This could potentially place a financial burden on MEA if dredging was required.

Consultee	**The Commissioners of Irish Lights**

Please note below Irish Lights' response to the three questions posed in your letter regarding the proposal and Environmental Statement (ES):

1. Based on the EIA scoping report as provided by RPS Tetra Tech as the agent acting on behalf of IMEL, specifically the reference therein to a Navigation Risk Assessment to include an assessment of whether 'new Aids to Navigation (AtoN) may be required on the proposed project', Irish Lights is content with this approach and will review the NRA and EIA in due course, including the proposed extent for such AtoN.

2. Apart from the above, Irish Lights does not have any additional comment to make regarding the ES. Irish Lights is available to provide further advice on statutory requirements in relation to the Merchant Shipping Act 1995 regarding AtoN in advance of

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an application. In particular, the opportunity to participate in the HAZID workshop as referenced in paragraph 13.8 of the EIA scoping report would be welcomed. 3. Irish Lights requests that DAERA engage further if and when an application is received for this proposal.	
Consultee	**Maritime & Coastguard Agency**
The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The Scoping Report has been considered by representatives of the Marine Safety and PNT Services team at the MCA, and we like to comment as follows: The MCA notes that planning permission for the gas storage facility has been granted in 2012 and marine licenses for both the abstraction of seawater and the discharge of brine are being applied for once more as the previous marine licenses were challenged through a judicial review. This Scoping report forms part of the Environmental Impact Assessment for marine elements of the IGSF and will support the marine construction license application. We note that the marine elements of the project includes (but is not limited to): • the seawater intake • brine outfall (at 27 m water depth) • gas storage caverns located within salt beds approximately 1,350 metres (m) below Larne Lough. On this occasion, the works to develop the gas storage caverns are located within the jurisdiction of a Statutory Harbour Authority (SHA) - Port of Larne, and therefore they are responsible for the safety of navigation within their waters. We further note that the intake and outfall works located on the opposite side of Islandmagee fall outside of SHA limits meaning that the safety of navigation therefore falls to the MCA. We note that the proposed seawater intake is located on the eastern side of Islandmagee and will extract water directly from the Irish Sea, with the proposed intake head located in approximately 10m water depth and an intake structure of a maximum height of 0.75m and a minimum diameter of 1.20m. For the brine outfall, which has a 40m long diffuser head, we understand that the proposed discharge point is on the eastern side of Islandmagee, where a 450mm HDPE pipeline is proposed to discharge the brine directly to the Irish Sea. The diffuser head on the seabed will be kept in situ with concrete mattress protection. It is understood that the cavern construction will be undertaken from the land and therefore there are no planned risks to navigation. We note in section 4.3.1.1.2 of the Scoping report that "*the tunnelling machine, complete with buoyancy, will be towed to port for recovery*". The applicant is reminded that if there are any proposed surface tows at any point in the project works, this will require further consultation with the local MCA Marine Office as there will likely be survey and certification requirements. All vessels and barges etc., must be appropriately surveyed and certified	

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and that, prior to any towing operations, the MCA is contacted with respect to any survey and certification requirements of said tow. If Hazardous materials are identified, suitable notification / precautions are to be taken with regards to crew members of supply vessels used for transportation.

We acknowledge the intention to conduct a Navigation Risk Assessment (NRA) to inform the assessment within the EIA. The NRA should include a baseline study which will summarise the available background navigation data and focus on any key shipping routes and/or anchorage/disposal areas and fishing/recreational activity in the vicinity of the project. With supporting marine traffic surveys (data should ideally be provided from within two years of publication of the ES), the NRA should establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). The range of potential project impacts on shipping and navigation and other marine users should be identified which could occur during the construction, operation, and decommissioning phases of the project. We would like to point the applicant in the direction of the International Maritime Organization (IMO) Formal Safety Assessment (FSA) methodology, which is the internationally recognised approach for assessing the impact to shipping and navigation users.

We would highly recommend that nautical charts be used in the NRA to provide the reassurance, clarity and contextual understanding of the navigational environment. We would also expect local consultation with marine users on the proposed works and recognise that the applicant will undertake a Marine Hazard Identification workshop, including local ports, harbours, fishing and recreational operators, amongst other stakeholders as appropriate.

A range of potential project impacts on shipping and navigation and other marine users have been identified which could occur during the construction, operation, and decommissioning phases of the project. The MCA would expect the EIA report to detail the possible impact on navigational issues for both commercial, fishing and recreational craft, specifically:

• Collision Risk
• Navigational Safety
• Visual intrusion and noise
• Risk Management and Emergency response
• Marking and lighting of site and information to mariners
• Effect on small craft navigational and communication equipment
• The risk to drifting recreational craft in adverse weather or tidal conditions
• The likely squeeze of small craft into the routes of larger commercial vessels
• Deviation from established vessel routes and areas

The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the Navigation Risk Assessment and further stakeholder consultation. In Table 13-1 of the Scoping Report, we recommend that 'Collision during navigation' and 'Accident to the general public' should be assessed for the operational phase as well as the construction stage. These receptors should be assessed in the NRA to ascertain if risk mitigation measures are required; because the

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introduction of the intake and outfall into the marine environment are permanent infrastructures that remain after the construction phase.

The MCA notes that the seawater intake will be located in approximately 10m water depth (with an intake structure of a maximum height of 0.75m and a minimum diameter of 1.20m) and the brine outfall will be located at 27 m water depth. It would be helpful if the applicant can clarify the height of the outfall from the base of the seabed including the height of concrete mattress protection. The MCA would be willing to accept up to a 5% maximum reduction in surrounding navigable depths referenced to Chart Datum. Where this is not achievable, the applicant must discuss further with the MCA. This will be particularly relevant where depths are decreasing towards shore, at cable crossings, and where potential impacts on navigable water increase. In these cases, the MCA would expect discussion with the applicant to ensure safe, navigable waterways are maintained.

Finally, to address the ongoing safe operation of the marine interface for any project works in SHA jurisdiction, we would like to point the developers in the direction of the Ports and Marine Facilities Safety Code (PMSC) and its Guide to Good Practice. They will need to liaise and consult with the SHA and develop a robust Safety Management System (SMS) for the project under this code.

The MCA is satisfied with the scoping report at this stage as the basis for the Environmental Statement and the proposals for the NRA from the shipping and navigation perspective. We would like to be engaged when an application is received for this proposal.

Consultee	**Port of Larne**

In my capacity as Harbour Master for Larne Port, I wish to highlight several key navigational and operational considerations that should be fully addressed within the scope of any Environmental Impact Assessment and supporting documentation.

1. Navigational Safety and Vessel Traffic
Larne Lough and its approaches support a high volume of commercial vessel traffic, including ferries, cargo vessels, and associated port operations. The potential for interaction between project-related activities (including construction vessels, offshore infrastructure, and exclusion zones) and existing traffic must be robustly assessed.
It should be clearly recognised that all project-related vessels will be required to transit through Larne Harbour Ltd port limits and pilotage area to access the proposed development area.
This should include:

- Detailed Navigational Risk Assessment (NRA)
- Consideration of cumulative traffic impacts
- Implications for vessel routing, pilotage, and safe passing distances

2. Construction Phase Impacts
The presence of construction vessels, subsea works, and any temporary restrictions or safety zones could pose risks to safe navigation. Clear methodologies for:

- Vessel management
- Communication protocols (including VTS/Port Control coordination)

- Marking and lighting of works must be defined.

3. Operational Phase Considerations
Permanent infrastructure, including pipelines and any offshore installations, must be assessed for their impact on:

- Navigational routes
- Anchoring areas
- Emergency manoeuvring space
- Future port development

4. Emergency Response and Incident Management
The scope should include a comprehensive assessment of:

- Emergency scenarios (e.g. gas release, vessel collision, infrastructure damage)
- Implications for port emergency response procedures
- Coordination with harbour authorities and emergency services

5. Marine Environment and Sediment Dynamics
Any dredging, discharge (including brine), or seabed disturbance has the potential to affect:

- Navigable depths
- Sediment transport within the lough
- Berthing and channel maintenance requirements

These factors must be assessed in the context of maintaining safe and efficient port operations.

6. Cumulative and In-Combination Effects
The assessment should consider other existing and planned marine activities within Larne Lough and adjacent waters to ensure that cumulative impacts on navigation and port operations are fully understood. Given the strategic importance of Larne Port, it is essential that navigational safety and operational continuity are treated as primary considerations throughout the assessment process. I would welcome continued engagement as the project develops and request that the Harbour Authority is consulted on all navigational risk assessments and marine safety plans.

Standing Advice and information available from those consultees who did not provide a response

DAERA NIEA Natural Environment Division (NED), Conservation Designation and Protections Branch (CDP)	Protected areas | Department of Agriculture, Environment and Rural Affairs
DAERA NIEA Natural Environment Division (NED) – - Habitat Survey Team	Biodiversity | Department of Agriculture, Environment and Rural Affairs

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- Evidence Team - Biodiversity Team - Invasive Species Team	
UK Hydrographic Office	UK Hydrographic Office - GOV.UK
Agri Food and Biosciences Institute (AFBI)	Home | Agri-Food and Biosciences Institute
The Crown Estate	Home | The Crown Estate
Department for the Economy (DfE)	Home | Department for the Economy

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