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**Re: Draft Wicklow County Development Plan 2021-2027**

Dear Sir / Madam,

DP Energy and Iberdrola Renewables Ireland welcome the opportunity to make a submission on the draft Wicklow County Development Plan 2021 - 2027.

DP Energy, and Iberdrola Renewables Ireland have developed a united response to this consultation focused on offshore wind development in light of their joint venture to develop three offshore wind projects off the coast of Ireland. The projects involved in the DP Energy - Iberdrola Renewables Ireland joint venture have been in development since 2016 and include: Shelmalere Offshore Wind Farm, an approximately 1 GW fixed wind project off the coasts of counties Wexford and Wicklow; Inis Ealga Marine Energy Park, an approximately 1 GW floating wind project off the coast of counties Cork and Waterford; and Clarus Offshore Wind Farm, an approximately 1 GW floating wind project off the coast of counties Clare and Kerry. The JV goal, subject to consents, is that two of these three potentially 1 GW projects be operational by 2030, significantly contributing to Ireland's Climate Action Plan targets.

DP Energy is a Cork-based renewable energy company operating worldwide to develop sustainable renewable energy projects. DP Energy's current portfolio of development projects includes offshore & onshore wind, ocean energy, solar PV and storage technologies. In addition to our three advanced joint venture projects with Iberdrola, DP Energy is also bringing forward

a potential fourth project, Latitude 52 Offshore Wind Farm, located off the east coast of Ireland. As such, two of our sites, Shelmalere Offshore Wind Farm and Latitude 52 Offshore Wind Farm, are located off the coast of counties Wicklow and Wexford.

Iberdrola Renewables Ireland is part of global energy leader Iberdrola. Iberdrola is one of the world's largest renewable energy producers, and the third biggest electricity utility globally in terms of market capitalisation. The group supplies energy to almost 100 million people in dozens of countries, has more than 600,000 shareholders, a workforce comprising more than 38,000 employees and assets worth more than €123 billion.

The Wicklow County Development Plan 2021-2027 covers a period that will see significant activity and development for offshore renewable energy in Ireland. Our Shelmalere Offshore Wind Farm and Latitude 52 Offshore Wind Farm developments have the potential to contribute in a major way to Ireland reaching its Climate Action Plan targets of 70% renewable energy by 2030 and through the need for long term operation and maintenance support to provide substantial benefit to County Wicklow in terms of local jobs and potential use of port facilities. It is against this backdrop that we are especially invested in making this submission on the draft Wicklow County Development Plan 2021 – 2027. This submission comments on a number of sections of the draft Wicklow County Development Plan 2021 – 2027 as follows:

## **Chapter 2, Development Plan Strategy**

Section 2.4 sets out the three Strategic Principles that guide the Development Plan Strategy (Section 2.4.2). These are followed by ten Strategic County Outcomes (Section 2.4.3).

One of the three Strategic Principles focusses on Climate Action (Section 2.4.2). However, this Strategic Principle doesn't highlight the potential for County Wicklow to meaningfully contribute to Climate Action by supporting offshore wind developments. We believe that the Strategic Principle that focusses on Climate Action should be expanded **as follows**:

*'Integrate climate change objectives into the County Development Plan to facilitate the sustainable growth of the County, enhance climate resilience and enable the transition to a low carbon, environmentally sustainable economy. The County Development Plan plays an important role in influencing a reduction in GHG emissions by guiding the sustainable growth of the County, **supporting the development of renewable energy including the growth of offshore wind**, encouraging more compact mixed-use development and greater use of sustainable transport options such as cycling, walking and public transport, restricting development in areas that are at risk of flooding and protecting the natural landscape and biodiversity.'*

The ten Strategic County Outcomes (Section 2.4.3) include SCO7 'Climate Resilience & the Transition to a Low Carbon Economy'. However, again this Strategic County Outcome doesn't

highlight the potential for County Wicklow to meaningfully contribute to progress towards a Low Carbon Economy by supporting offshore wind developments. Given the significance and importance of the Climate Action Plan and its ambitious targets for offshore wind specifically, we believe that another Strategic County Outcome should be added to Section 2.4.3 as follows:

*‘Recognise and support the development of renewable energy solutions and projects, including offshore wind farm developments in alignment with Climate Action Plan and other national and international targets’.*

### **Chapter 9, Economic Development:**

Offshore renewable energy projects supported from County Wicklow have potential to deliver significant economic benefits for County Wicklow. We would like to suggest the inclusion of an acknowledgement to this effect in Chapter 9, Economic Development of the Wicklow County Development Plan 2021 – 2027.

#### **Section 9.3 The Role of Land Use Planning in Economic Development:**

DP Energy welcomes the inclusion of CPO 9.21 and CPO 9.22:

*‘CPO 9.21 To encourage and facilitate the development of ‘green’ industries, including industries relating to renewable energy and energy-efficient technologies, waste recycling and conservation.*

*CPO 9.22 To encourage and facilitate the development of off-shore wind operation and maintenance bases which will create new opportunities for employment and skills development. Such development is particularly suited to the redevelopment of brownfield harbour lands.’*

Outside of the examples of ‘offshore wind operation and maintenance bases’ set out in CPO 9.22, DP Energy would also like to highlight the critical role County Wicklow can play in encouraging and facilitating other onshore infrastructure associated with the construction, operation and decommissioning of large-scale offshore wind farms including but not limited to: temporary construction compounds; temporary lay-down areas for wind farm components; assembly areas for wind farm components; underground cabling from point of cable landfall at coast to point of connection; onshore substation; and port & harbour infrastructure.

DP Energy would like to request that CPO 9.22 of the draft Wicklow County Development Plan 2016 – 2022 be expanded to include more of these examples of the onshore infrastructure to which County Wicklow’s support is critical for the success of offshore wind ambitions off the County Wicklow coast.

## **Chapter 19, Marine Planning and Coastal Zone Management:**

**Section 19.0 ‘Introduction’** of the draft Wicklow County Development Plan 2021 - 2027 includes ‘energy production’ in the list of examples of diverse activities and industries associated with the County Wicklow coastline. The acknowledgement of ‘energy production’ here is welcomed.

Discussion on climate change in Section 19.0 is also welcomed, as is the acknowledgement that offshore wind has a role to play in contributing to the County Development Plan’s goals relating to ‘climate action’ and ‘economic opportunity’.

**Section 11.1 ‘Coastal Zone Management – Introduction’** of the Wicklow County Development Plan **2016 -2022** included text which read as follows:

*‘..any objectives set out in this chapter shall override any other objectives set out in this plan.’*

It is encouraging to see that this text is not included in Chapter 19 of the draft Wicklow County Development Plan 2021 – 2027. While DP Energy acknowledges the importance of effective coastal zone management, DP Energy’s offshore wind farm developments will each be subject to Screening for Appropriate Assessment (in accordance with Article 6 of the Habitats Directive) and full Environmental Impact Assessment Report (EIAR – in accordance with the EIA Directive). The project-specific EIAR will accompany the consent application for each offshore wind farm development. The EIAR Scoping Exercise for Shelmalere Offshore Wind Farm is scheduled to commence late 2021 with procurement of the lead EIAR Consultant currently underway. The fact that the text set out in italics above is not included in the draft Wicklow County Development Plan 2021 – 2027 is seen as acknowledgment of Ireland’s Climate Action Plan targets and the critical nature of those objectives set out throughout the Plan that relate to supporting the development of offshore renewable energy.

**Section 19.1 ‘Legislative & Strategy Context’** of the draft Wicklow County Development Plan 2021 - 2027 includes a sub-section dedicated to the ‘National Marine Planning Framework’ (NMPF). It is noted that this section will need updating now that the government’s 1<sup>st</sup> July 2021 launch of the NMPF has taken place. Update of this subsection to reflect current status of NMPF will be key and the current acknowledgement in Section 19.1 that the ‘County Development Plan must be consistent with the approved NMPF’ is welcomed.

**Section 19.1 ‘Legislative & Strategy Context’** of the draft Wicklow County Development Plan 2021 - 2027 also includes a sub-section dedicated to the ‘Marine Planning and Development Management Bill 2019’. It is noted that this section will need updating now that the ‘Marine Planning and Development Management Bill 2019’ has been superseded by the ‘Maritime Area Planning Bill 2021’ (MAP Bill). The inclusion of a subsection specific to the Bill is welcomed though it is noted that update of this subsection to reflect latest status of MAP Bill will be key. It also noted that references to the ‘Marine Planning and Development Management Bill / Act’, such as that in CPO 19.1 and CP19.2 (Section 19.4, pg 418), will also require update in light of the MAP Bill.

**Section 19.2 ‘Local Context & Strategy’** of the draft Wicklow County Development Plan 2021 – 2027 includes a sub-section entitled ‘Marine Economy / Blue Economy’. The final paragraph of this subsection (pg 414) states:

*‘There is a significant opportunity for Wicklow to take advantage of the Offshore Wind Sector and any associated spin offs such as on-shore ‘operations and maintenance’ facilities and the creation of ‘local offshore wind enterprise zones’.’*

This acknowledgement of the significant opportunity for County Wicklow to benefit from the development of Offshore Wind is welcomed. Outside of the example of ‘operations and maintenance’, DP Energy would also like to highlight the opportunity for County Wicklow in hosting other onshore infrastructure associated with the construction, operation and decommissioning of large-scale offshore wind farms including but not limited to: temporary construction compounds; temporary lay-down areas for wind farm components; assembly areas for wind farm components; underground cabling from point of cable landfall at coast to point of connection; onshore grid connection points; and port & harbour infrastructure. It is requested that the text in italics above be expanded to acknowledge these other examples representing opportunity for County Wicklow, and to which County Wicklow’s support is critical for the success of offshore wind ambitions off the County Wicklow coast.

**Section 19.4 ‘Marine Spatial Planning and Coastal Zone Management Objectives’** includes 27 no. objectives. We welcome the inclusion of ‘renewable energy’ in **CPO 19.3**, and the support for ‘the development or expansion of port facilities’ in **CPO 19.6**. We respectfully request that

our comments and observations on the following objectives are incorporated into the final Wicklow County Development Plan 2021 – 2027:

**CPO 19.2:**

*‘To work with the Department of Housing, Planning and Local Government and other relevant government departments and bodies on marine planning with particular reference to the following areas;*

- *the implementation of the National Marine Planning Framework (following its adoption),*
- *the implementation of any future Marine Planning and Development Management Act in so far as it relates to the duties and functions of the Planning Authority,*
- *the designation of the nearshore area for County Wicklow,*
- *the preparation of any sub-regional plans for the maritime area and nearshore area.’*

With respect to the 3<sup>rd</sup> bullet point of CP19.2, *‘the designation of the nearshore area for County Wicklow’*, we request that the commitment in the introductory paragraph is extended to work with ‘renewable energy developers’ also.

**CPO 19.8 and CPO 19.9:**

*CPO 19.8: ‘To protect the character and visual potential of the coast and conserve the character and quality of seascapes.’*

*CPO 19.9: To strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards, and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or potential threat to coastal habitats or features, and/or where the development is likely to result in undesirable patterns of erosion or deposition elsewhere along the coast.*

We recognise the importance of visual amenity as evidenced by the detailed Landscape, Seascape and Visual Impact appraisals carried out as part of the renewable energy project development process. As such, we acknowledge the importance of inclusion of CPO 19.8 and CPO 19.9 in the draft Wicklow County Development Plan 2021 – 2027. So that these objectives also reflect the draft Wicklow County Development Plan’s support for offshore renewable energy development, we respectfully request that either:

a) These specific objectives CPO 19.8 and CPO 19.9 be expanded to acknowledge the key role that offshore renewable energy development off the Wicklow coast has in helping Ireland achieve its renewable energy targets; or

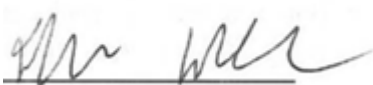
b) A new objective be added to Section 19.4 in support of the key role that offshore renewable energy development off the Wicklow coast has in helping Ireland achieve its renewable energy targets.

Lastly, and more generally, we would like to request that the Wicklow County Development Plan 2021 - 2027 acknowledges our Shelmalere Offshore Wind Farm and Latitude 52 Offshore Wind Farm developments which are both located off the county Wicklow and Wexford coasts. This approach has been taken by Cork County Council in the draft Cork County Development Plan 2022 – 2028 which references our Inis Ealga Marine Energy Park development located off the coast of counties Cork and Waterford (see Section 13.9.3 of 'Volume 1 Main Policy Material' of [draft Cork County Development Plan 2022 - 2028](#)).

In conclusion, we applaud Wicklow County Council in recognising the offshore renewable energy sector in the draft Wicklow County Development Plan 2021 – 2027 and we respectfully request that our comments and observations detailed above are incorporated into the final Wicklow County Development Plan 2021 - 2027.

Should you wish to have further information or clarifications in relation to DP Energy & Iberdrola Renewables Ireland's offshore wind development projects, please don't hesitate to contact us at the contact details provided on page 1 of this submission.

Yours sincerely,



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Consenting and Environment Manager  
Senior Planning & Environmental Policy Manager



**Grant Douglas MRTPI**

