

The logo consists of the letters 'O' and 'W' in a bold, dark blue, sans-serif font. The 'O' is a simple circle, and the 'W' is composed of two 'V' shapes joined at the top.

OCEAN WINDS

The background of the entire page is a photograph of several wind turbines on a beach. The sky is a mix of orange and yellow, suggesting a sunset or sunrise. The water in the foreground is a light, shimmering blue.

Ocean Winds Submission
to the Draft Wicklow
County Development Plan
2021-2027

Prepared by

OCEAN WINDS, Development Consenting Unit
Ocean Winds Ireland
Osprey Business Centre,
Devoy Quarter, Naas,
Co. Kildare,
W91 X40K

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1.0 INTRODUCTION

- 1.1 Ocean Winds welcomes this opportunity to make a submission to the Draft Wicklow County Development Plan 2021-2027 and supports the central role that County Development Plan will play in implementing the Irish Government’s Programme for Government (2020), Climate Action Plan (2019), draft National Marine Planning Framework (2020) and Offshore Renewable Energy Development Plan (OREDP, 2014).
- 1.2 This submission relates to the development of the proposed Cailleach Offshore Wind Farm. The site proposed for the Cailleach Offshore Wind Farm is located in the Irish Sea off the coasts of Counties Wicklow and Dublin. The site lies within the Irish Sea area identified in red under Figure 1.1 below.

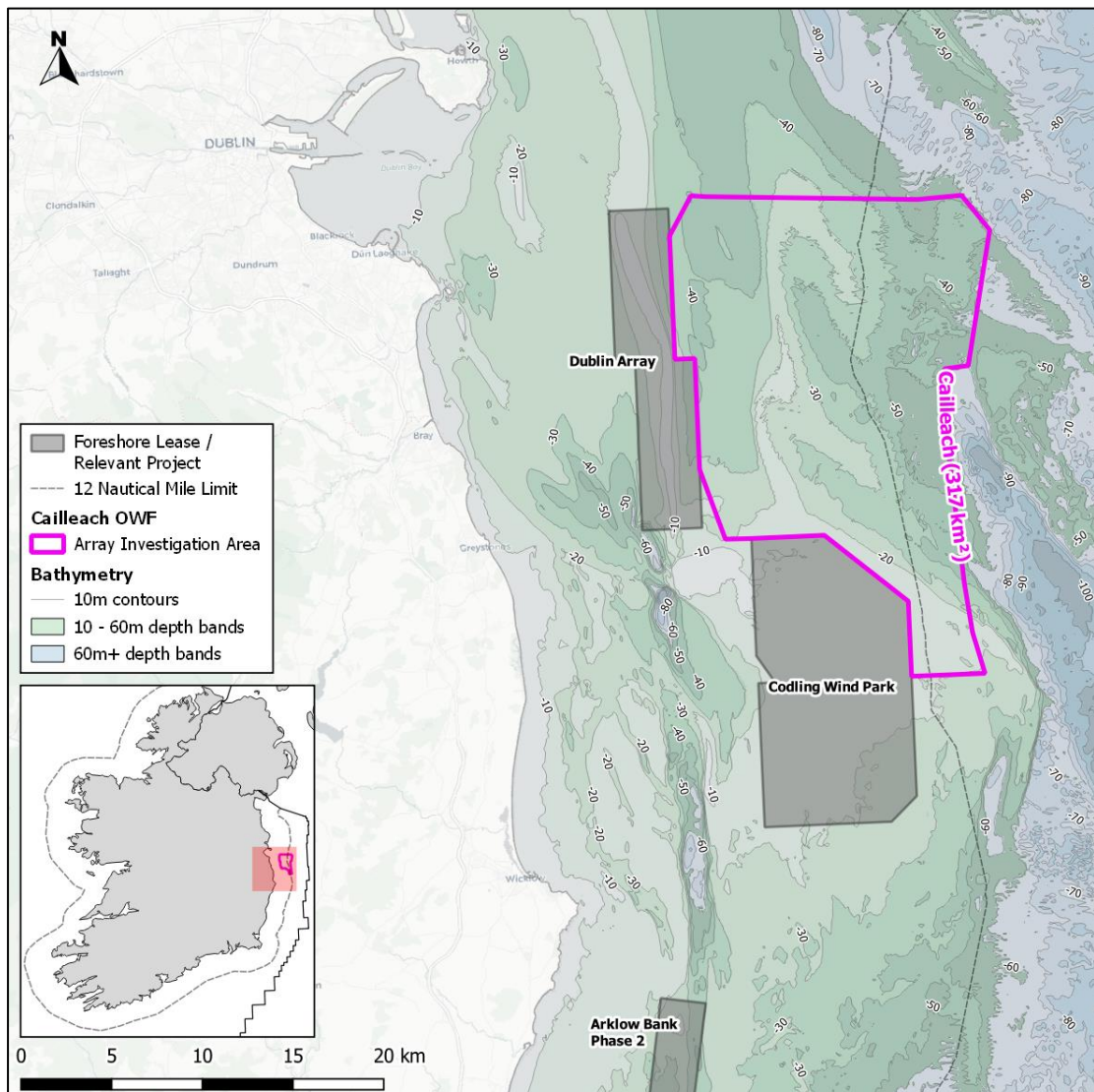


Figure 1.1 - Location of the Cailleach Offshore Wind Farm off the coast of Co. Wicklow and Co. Dublin (Area outlined in pink)

1.2 Ocean Winds have recently submitted a Foreshore Licence Application for the Cailleach Offshore Wind Farm with the Department of Housing, Local Government and Heritage. Ocean Winds notes that application identified three plausible landfall locations were shortlisted as follows;

- Northern Area (located at Poolbeg Substation);
- Central Area (located in Shankill area – south of Killiney and north of Bray); and
- Southern Area (located south of Greystones):

1.3 Figure 1.2 below shows the location of the landfall options for the Cailleach Offshore Wind Farm export cables and the resultant Proposed Cable Route Area. Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only.

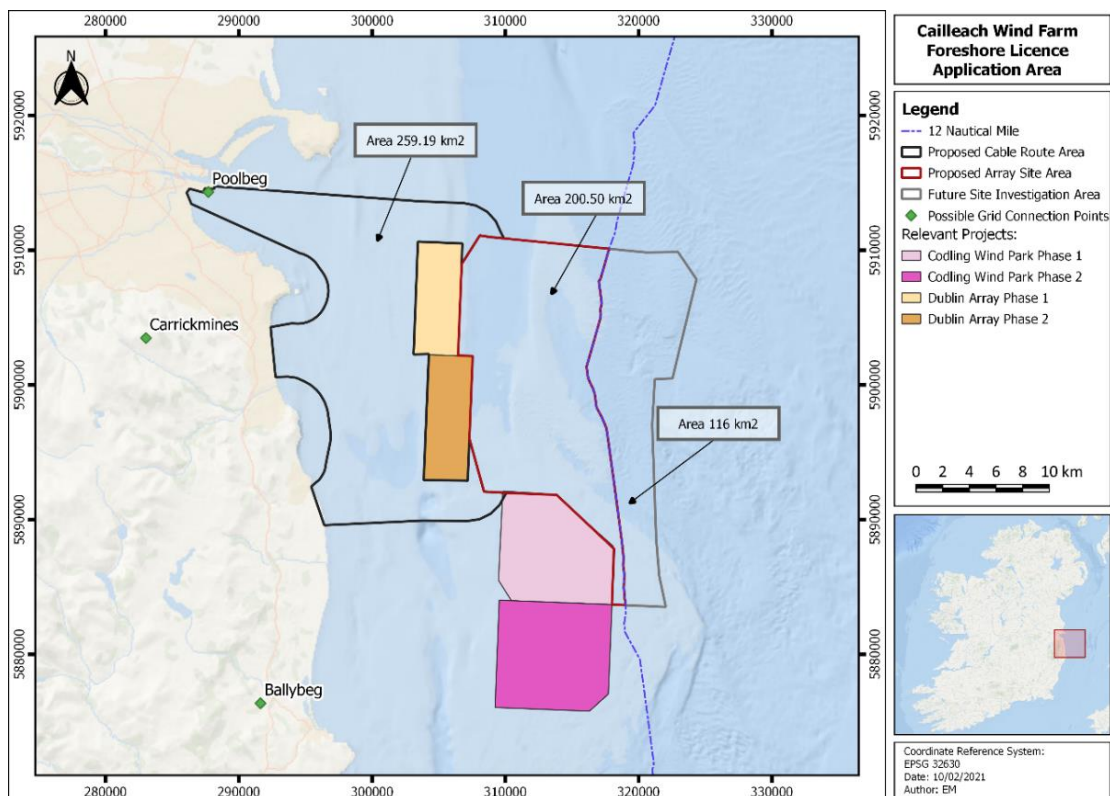


Figure 1.2 – Indicative Route and Investigation Map for the Cailleach Offshore Wind Farm. (Please note that the image below only presents potential and indicative routes and do not form part of any application and are only for illustrative purposes only)

1.4 Ocean Winds supports the vision and objectives included the Draft Wicklow County Development Plan 2021-2027. Ocean Winds recognise that Wicklow County Council has a strong reputation in placing climate action at the heart of all policies and strategies. However, given that there are three plausible landfall locations for the Cailleach Offshore Wind Farm and the plausible routes identified as part of the central and southern routes are located in Co. Wicklow, Ocean Winds wish to have a proactive and engaging relationship with Wicklow County Council regarding the Cailleach Wind Farm.

- 1.5 It is viewed that the grid connection from the Cailleach Offshore Wind Farm will require an underground transmission cable on land to connect to the main national grid. It is viewed that Wicklow County Council will be heavily involved in the overland process and will be a key player in the selection of this route. Ocean Winds remains open and committed to engaging with Wickow County Council in moving forward with this process in the immediate future.
- 1.6 In light of the comments and considerations presented above, Ocean Winds would like to draw attention to the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF). The Marine Planning and Development Management Bill (2021) seeks to establish a new consent process for the maritime area which will replace existing State and development consent regimes and streamline arrangements on the basis of a single consent principle i.e. one state consent (Maritime Area Consent) to enable occupation of the Maritime Area. It is viewed that Wicklow County Council will have a central role in supporting and enacting the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF).

2.0 WHO WE ARE – OCEAN WINDS?

- 2.1 Ocean Winds is the result of a 2019 joint venture by EDP Renewables (EDPR) and ENGIE. Both companies share the vision in which renewables, particularly offshore wind, play a key role in the global energy transition. That is why they created a 50-50 joint venture for offshore wind. All the existing and pipeline offshore wind projects portfolio of both companies have been included in the new Ocean Winds company, with a total of 1.5 GW under construction and 4.0 GW currently under development. Ocean Winds aim to reach 5 to 7 GW of projects in operation or under construction and have 5 to 10 GW under advanced development by 2025. The Ocean Winds business mainly targets markets in Europe, the United States and also in selected locations in Asia.

[Joint Venture Company Information: About EDPR](#)

- 2.2 EPPR has a portfolio of 11.6 GW of installed renewable energy capacity spread across 13 geographies. Its wind operations are headquartered in Edinburgh, Scotland, which was established in 2010. EDPR has been developing the Moray East Offshore Wind Farm in the Moray Firth, Scotland, which is currently in construction and has a capacity of 950 MW, with completion aimed at 2022. The Moray West Wind Farm Project, adjacent to Moray East has an expected future output of 800MW, was awarded the required consents and is at the stage of refining engineering and evaluating a route to market in advance of commencing construction. Other EDPR international projects involved development of offshore wind projects in France, Poland, the USA and Korea. EDPR also had a pioneering role in the development of floating offshore wind, through a project off the coast of Portugal, WindFloat Atlantic, which represented the first floating offshore wind turbine in the Atlantic Ocean and has continued to support the development of floating offshore wind e.g. by developing further pilot projects in France and Portugal and securing floating offshore wind projects in the USA and Korea.

[Joint Venture Company Information: About ENGIE](#)

- 2.3 ENGIE is a global energy company operating in almost 70 countries and having launched several wind projects around the world, it will achieve 33 GW of installed capacity in renewables by 2021. ENGIE is currently investing in major offshore wind projects, both bottom-fixed and floating with the aim of leading in renewable technologies, such as offshore wind energy. The company is both an energy trader and a licensed supplier selling to business customers in the United Kingdom. Its power purchase included Scottish windfarms, including the largest community owned renewables project - Point & Sandwick Trust. ENGIE projects in France include developments offshore of Le Tréport, Yeu and Noirmoutier islands and Dunkirk. It is also part of a consortium selected by the French government to develop and install two offshore wind farms with a total capacity of approximately 1,000 MW.

3.0 OVERVIEW OF CAILLEACH OFFSHORE WINDFARM

- 3.1 Ocean Winds UK Limited (Ocean Winds) has established a special purpose vehicle "Cailleach Offshore Windfarm Limited" for the purpose of investigating the feasibility of developing an offshore bottom-fixed wind farm in the East coast of Ireland. Cailleach Offshore Windfarm Limited is applying for a licence to undertake site investigation activities on a site called Cailleach Offshore Wind Farm (OWF) in the west Irish Sea. The Cailleach OWF is located inside and outside on the 12 nautical mile (NM) territorial limit and this licence application relates to the area within the 12 NM limit only (i.e. within the foreshore). The Cailleach OWF project is a key part of OW's wider portfolio of strategic offshore wind developments in Ireland.
- 3.2 Based on the above, three plausible landfall locations were shortlisted including the Northern Area (located at Poolbeg Substation), Central Area (located in Shankill area – south of Killiney and north of Bray), and Southern Area (located south of Greystones). Figure 3.1 below shows the location of these landfall options for the Cailleach Offshore Wind Farm export cables and the resultant Proposed Cable Route Area. Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only.

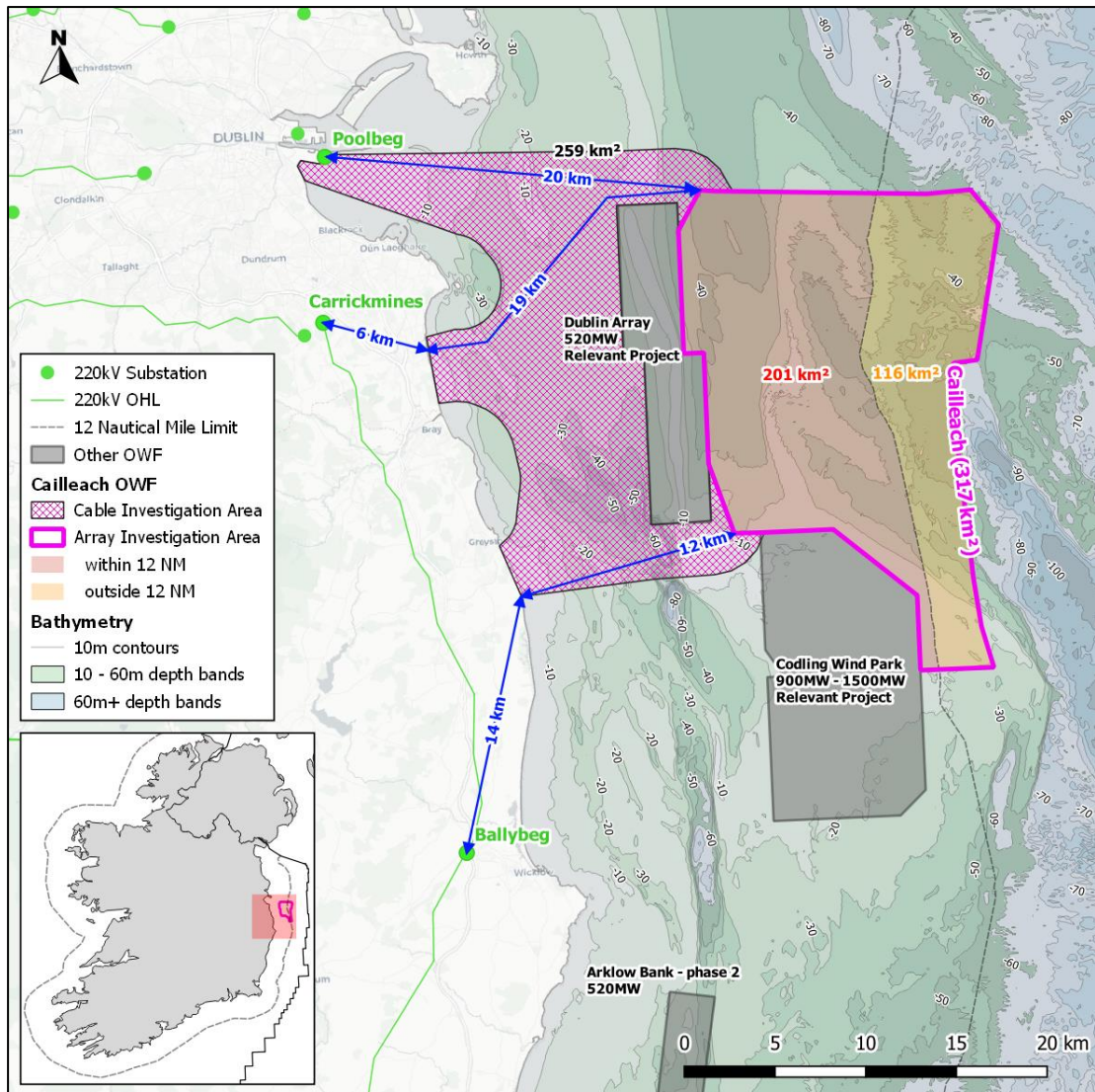


Figure 3.1 – Location of the Cailleach Offshore Wind Farm. (Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only)

Policy Background and Cailleach Alignment

3.3 In June 2019, the Climate Action Plan by the Irish government, announced the target to achieve 70% of electricity production from renewables by 2030. Offshore wind development is a key technology to achieve this target with “at least 3.5GW” to be generated by offshore wind by 2030 as per the action plan. In June 2020, the Programme for Government of the new coalition government increased the target to 5GW of installed offshore wind capacity by 2030. This will be supported by the Renewable Electricity Support Scheme (RESS) which has been developed to support renewable technologies and is key to achieving the target of 70% of electricity from renewable sources by 2030 as set out in the Climate Action Plan, with an offshore specific auction planned for late 2021 and subsequent auctions every 18-21 months thereafter. OW and the Cailleach Wind Farm project development can be a clear and significant contributor to this policy target and the Climate Action Plan..

4.0 THE MARITIME AREA PLANNING BILL (MAP) AND NATIONAL MARINE PLANNING FRAMEWORK (NMPF) VS THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027

- 4.1 On 30th June 2021, the Irish government published a pre-initiation draft of the Maritime Area Planning (MAP) Bill 2021 and also launched the National Marine Planning Framework (NMPF).
- 4.2 The Marine Planning and Development Management Bill (2021) seeks to establish a new consent process for the maritime area which will replace existing State and development consent regimes and streamline arrangements on the basis of a single consent principle i.e. one state consent (Maritime Area Consent) to enable occupation of the Maritime Area and one development consent (planning permission), with a single environmental assessment. In order to obtain authorisation for a proposed maritime usage a prospective developer will be required to apply to the relevant Minister for Maritime area consent (MAC). If such an application is successful, the prospective developer will be granted a MAC, conditional on securing planning permission from a coastal planning authority or An Bord Pleanála. Requirements in respect of environmental impact assessment (EIA), and in respect of appropriate assessment (AA) under the Habitats Directive will be fulfilled in the processing of the application for planning permission. If a proposal does not require planning permission, the EIA and AA assessments/screening will be undertaken by a coastal planning authority or An Bord Pleanála.
- 4.3 In order to support the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF), the Draft Wicklow County Development Plan 2021-2027 supports the following Marine Spatial Planning and Coastal Zone Management Objectives.

Marine Planning Objectives of the Draft Wicklow County Development Plan 2021-2027

CPO 19.1 – To review and update the County Development Plan if necessary to ensure that it is consistent with the following:

- *The National Marine Planning Framework following its adoption, and*
- *The Marine Planning and Development Management Act (following its enactment)*

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.*

CPO 19.3 – To support the development of the Marine Economy / Blue Economy sector, particularly in the renewable energy, shipping and fishing / aquaculture sectors. To support the work of the Wicklow Maritime Business Development Group and the implementation of strategies and projects related to enhancing the marine economy.

- 4.4. In light of the Coast & Marine Policy Objectives contained within the Draft Wicklow County Development Plan 2021-2027, Ocean Winds actively supports Wicklow County Council's vision in implementing and supporting the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPPF),

5.0 ENERGY INFRASTRUCTURE POLICIES AND OBJECTIVES OF THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027

- 5.1 The Draft Wicklow County Development Plan 2021-2027 supports the following Utility, Energy & Communication Policy Objectives.

Wind Energy Objectives of the Draft Wicklow County Development Plan 2021-2027

CPO 16.1 – To encourage the development of wind energy in accordance with the County Wicklow Wind Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:

- *Consideration of any designated nature conservation areas (SACs, NHAs, SPAs, SAAOs etc) and any associated buffers;*
- *Consideration of collision risk species (bird and bats);*
- *Impacts on Wicklow's landscape designations;*
- *Particular cognisance and regard being taken of the impact on wind turbines on Residential amenity particularly with respect to noise and shadow flicker;*
- *Impacts on visual and recreational amenity;*
- *Impacts on 'material assets' such as towns, infrastructure and heritage sites;*
- *Consideration of land cover and land uses on or adjacent to the site;*
- *Best practice in the design and siting of wind turbines, and all ancillary works including access;*
- *Roads and overhead cables.*

CPO 16.2 – To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required.

CPO 16.3 – To support community-based wind energy projects.

Transmission & Distribution Objectives of the Draft Wicklow County Development Plan 2021-2027

CPO 16.14 – To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.

CPO 16.15 – To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres.

CPO 16.16 – To support roll-out of the Smart Grids and Smart Cities Actions enabling new connections, grid balancing, energy management and micro grid development.

CPO 16.17 – To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid.

CPO 16.19 – To support and facilitate the development of landing locations for off shore generated wind energy and for any cross channel power interconnectors.

CPO 16.20 – Proposals for the undergrounding of cables should demonstrate that environmental impacts including the following are minimised:

- *Habitat loss as a result of removal of field boundaries and hedgerows by topsoil stripping*
- *Short to medium term impacts on the landscape where, for example, hedgerows are encountered;*
- *Impacts on underground archaeology;*
- *Impacts on soil structure and drainage; and*
- *Impacts on surface waters as a result of sedimentation*

5.2. In light of the Wind Energy, Transmission, & Distribution Objectives contained within the Draft Wicklow County Development Plan 2021-2027, Ocean Winds actively supports Wicklow County Council's vision in implementing and supporting offshore wind farm development.

6.0 CONCLUSION

6.1 The Wicklow County Development Plan 2022-2028 is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan can deliver a long-term strategic planning and economic framework for the development of the County.

6.2 Ocean Winds is available to discuss any aspect of our response if that would be helpful to Wicklow County Council.

6.3 The Council is requested, to include the energy targets for renewable and offshore renewable energy directly under the county development plan as high-level objectives

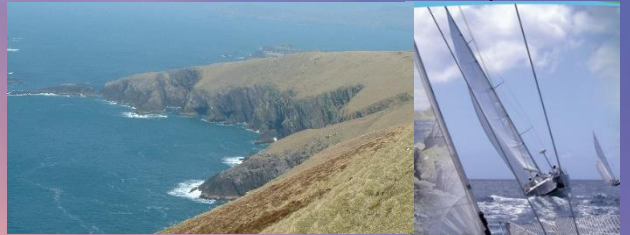
of the county development plan, for prior to 2030 and the targets for after 2030, as set out by the programme for government and associated policy statements.

- 6.4 It is submitted that the council should include the in-principle recognition of the importance of the fact that Bulk Marine Renewable-Energy Infrastructure Development is directly linked, and are critical to the achievements of the governments legal commitment to renewable energy targets for the periods pre-2030, post-2030 and the objective of zero carbon by 2050.
- 6.5 It is submitted that a high level policy be included in the county development plan that a whole of government approach should be followed on the plan, management and future consenting of offshore infrastructure policy as to “fully aligned with economic and social policy objectives” through consultation and discussion, “structured engagement and cooperation across all sectors of the public sector. It would be important to ensure that the county development develops its own level of objectives that directly integrates with the regional and national offshore renewable-energy objectives and not merely refer to the regional and national objectives, such as to create a whole of government integrated approach. A hierarchical tiered policy is required, where local county wide and county marine are wide renewable-energy targets, policy, policy objectives, marine spatial planning zoning designations and clearly formulated decision-making criteria are developed and included directly in the county development plan.
- 6.6 It is submitted that a strategic policy be added to indicate that in order to attract high quality industries like i.e. green linked data centres, green hydrogen and the clean and reliable manufacturing of ammonia fuel as then industries of the present and the future to the county that the development of offshore renewable energy and offshore wind farms need to be supported as these industries are circularly linked. If this can be achieved significant job creation and significant local economic growth with the Green Economy, within the county in industries that are both the present and the future of a sustainable and fully green economy, creating jobs for the next 50-100 years.
- 6.7 It is further submitted that a strategic objective be added that recognise the need for the electricity transmission grid as both a local and regional asset terrestrial and marine area, that needs to be developed in a sensitive and environmentally sustainable way to facilitate a new “local product” of offshore renewable energy that can be exported or imported to local business interests, exported to the country or abroad with the potential for very significant investment growth in the county and local community.
- 6.8 It is submitted that the county development plan should direct policy objectives to indicate that the council is committed to participate, encourage, facilitate and raise awareness of the need for public participation to during the present and future offshore consent processes that applies and will apply to “Bulk Marine Renewable-Energy Infrastructure Development” i.e. proposed MAC (Marine Area Consenting) leasing and the future “Strategic Marine Renewable-energy Infrastructure Consenting” process (directly similar to the Strategic Infrastructure Development application process) when incorporated under the Planning and Development Act 2000, as amended.

- 6.9 Early consultation and discussion with the marine offshore developers on planned "Bulk Marine Renewable-Energy Infrastructure Development" should be encouraged, with by the Local Council, specifically also when they are not the competent planning authority. The importance of the local council's role as prescribed bodies under the future the "Strategic Marine Renewable-energy Infrastructure Consenting" process (directly similar to the SID consenting regime), should be recognised and adequately resourced in the interest of representing the local community's interest.
- 6.10 It is submitted that the county development plan needs to develop, include and draft text to include decision making criteria and measures to consider the consenting and submissions "Bulk Marine Renewable-Energy Infrastructure Development" as a prescribed body to the future "Strategic Marine Renewable-energy Infrastructure Consenting". projects such as Offshore Wind Farms(bottom fixed and floating wind farms), Offshore and Onshore underground electrical transmission cables and substations, and other associated infrastructure and projects.

It is submitted that "In principle," principle", the local authority should through their terrestrial and future marine area local area plans provide policy and zoning objectives to facilitate the provision of "Bulk Marine Renewable-Energy Infrastructure Development" and energy networks, provided that it can be demonstrated that:

- *The proposed Bulk Marine Renewable-Energy Infrastructure development is a strategic project that will significantly contribute to meeting the local, regional and national renewable energy targets and objectives,*
- *The marine spatial location and marine and terrestrial route proposed have been identified with due consideration for social, environmental and cultural impacts;*
- *The design is such that will achieve least environmental impact consistent with not incurring excessive cost;*
- *Where impacts are inevitable mitigation features have been included.*
- *Where it can be shown the proposed development is consistent with international best practice with regard to materials and technologies, that will significantly contribute to meeting the local, regional and national renewable energy targets and objectives,*



Ocean Winds Ireland:

Osprey Business Centre, Devoy Quarter, Naas, Co. Kildare, W91 X40K

Head Office:

5th floor, Atria One, 144 Morrison Street, EH3 8EX, Edinburgh, UK

www.oceanwinds.com

Registered Office:

Octagon Point, 5 Cheapside,
London, EC2V 6AA

Company Number: 07101190