Oriel Wind Farm Project

Planning Report

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

A TETRA TECH COMPANY

PARK WIND
JERA GROUP

Energy for generations

ORIEL WIND FARM PROJECT

Planning Report

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Acronyms

Term	Meaning
AA	Appropriate Assessment
ABP	An Bord Pleanála
AIS	Air Insulated Switchgear
CER	Commission for Energy Regulation
CEMP	Construction Environmental Management Plan
CfD	Contract for Difference
CTMP	Construction Transport Management Plan
CPPA	Corporate Power Purchase Agreement
CAP	Climate Action Plan
CPA	Coastal Planning Authority
CRU	Commission for Regulation of Utilities
DMAPS	Designated Maritime Area Plans
EMP	Environmental Management Plan
DECC	Department of the Environment, Climate and Communications
EIAR	Environmental Impact Assessment Report
EIS	Environmental Impact Statement
EMRA	Eastern and Midlands Regional Assembly
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HWM	High water Mark
LAT	Lowest Astronomical Tide
MAC	Maritime Area Consent
MAPA	Maritime Area Planning Act
MARA	Maritime Area Regulatory Authority
MJA	Maritime Jurisdiction Act 2021
MPPS	Marine Planning Policy Statement
NHA	Natural Heritage Area
NIS	Natura Impact Statement
NMPF	National Marine Planning Framework
NPF	National Planning Framework
NPWS	National Parks and Wildlife Service
OREDP	Offshore Renewable Energy Development Plan
RSES	Regional Spatial and Economic Strategy
SAC	Special Area of Conservation
SPA	Special Protection Area
TJB	Transition Joint Bay
WTG	Wind Turbine Generator

1 INTRODUCTION

1.1 Introduction to the Project

This Planning Report has been prepared by RPS Group Limited (RPS) to accompany an application for permission made by the Applicant, Oriel Windfarm Limited[1] to An Bord Pleanála (ABP / the Board) for the Oriel Wind Farm Project (hereafter 'the Project'). The application is being made under Section 291 of the Planning and Development Act 2000, as amended (hereafter, the Act).

The Project is situated partially in the outer maritime area, partly in the nearshore area of Louth County Council and partially onshore within the following Townlands in Co. Louth; Dunany, Mitchelstown, Port, Nicholastown (Electoral Division of Dysart in the Barony of Ferrard), Boycetown, Togher, Clonmore, Tullydonnell, Corstown (Electoral Division of Drumcar in the Barony of Ardee), Corstown (Electoral Division of Dunleer in the Barony of Ferrard), Drumcar, Mullincross, Charleville, Dromgoolestown, Richardstown (Electoral Division of Stabannan in the Barony of Ardee), Harristown and Stickillin.

The proposed development consists of the following principal elements:

A. Offshore renewable energy infrastructure in the outer maritime area located between approximately 6 km south of Cooley Point and approximately 10 km north-east of Dunany Point across an offshore wind farm area of approximately 27.7 km^2 and consisting of the following:

   i. 25 No. offshore wind turbines with a maximum tip height of 270 m above the Lowest Astronomical Tide (LAT) attached to the seabed by monopile foundations with associated scour protection and with a combined Maximum Export Capacity of 375 MW.

   ii. A network of 41 km of 66 kV subsea inter-array cables linking each of the proposed offshore wind turbines to the offshore substation including associated cable protection.

   iii. 1 No. offshore substation with a height of 48 m above LAT attached to the seabed by a monopile foundation with associated scour protection. This includes a prefabricated structure containing electrical equipment and ancillary equipment including a telecommunications mast.

B. A single 16 km long 220 kV subsea export cable and associated cable protection located within an offshore cable corridor of approximately 25 km^2 between the south-west corner of the offshore wind farm area and a landfall which is situated approximately 700 m south of Dunany Point.

C. An underground Transition Joint Bay (TJB) at the proposed landfall in the townland of Dunany. The TJB consists of a fully buried concrete chamber with a total area of 32.5 m^2, where the proposed offshore export cable will be connected to the underground onshore export cables.

D. Installation of underground onshore export cables, approximately 20.1 km in length, connecting the proposed TJB in the townland of Dunany to the proposed onshore substation in the townland of Stickillin. The cables will be laid in a standard trench of approximately 700 mm in width and 1425 mm in depth.

E. Installation of fibre optic, telecommunication and other associated cabling all carried in underground ducts within the proposed trench.

F. Installation of 2 No. additional fibre optic cable ducts within the underground cable trench of approximately 1500 mm in width, from the proposed onshore substation in the townland of Stickillin along the N33 for approximately 3 km and connection into a 110 kV double wooden poleset on the existing Drybridge-Louth 110kV overhead line in the townland of Richardstown, (Electoral Division of Stabannan).

G. Installation of the cables will require associated joint bays and link boxes, located at approximately 700 m intervals along the underground cable alignment. The cable installation will also require the construction of temporary passing bays and the use of either Horizontal Directional Drilling (HDD) or open cut construction techniques for utility crossings of water, rail, gas and motorway.

[1] With an address at the Digital Office Centre, Balheary Demesne, Swords, Co. Dublin, K67 E5AO.

H. A new onshore electricity substation adjacent to the proposed connection point in the townland of Stickillin. The onshore substation will comprise of the following main elements:

   i. Compound 1 Onshore Transmission Connection.

   ii. Compound 2 Offshore Transmission System.

   iii. Entrance Compound providing access to Compound 1 and Compound 2.

   iv. Common Areas.

I. 2 No. line cable interface masts of 27 m in height will be constructed adjacent to the onshore substation. This will require an existing 220 kV tower (31 m in height) and associated infrastructure to be decommissioned.

J. A temporary construction compound adjacent to the onshore substation with a footprint of approximately 12,860 m^2 including welfare and storage areas. 3 No. additional temporary construction compounds located along the onshore cable route varying in footprint from 3,000 m^2 to 4,200 m^2 and 8 No. temporary HDD compounds (4 off road HDD's) varying in footprint from 100 m^2 to 4,500 m^2.

K. All associated and ancillary above and below ground development including works comprising or relating to construction works, roadworks, excavation (including HDD) and vegetation clearance.

Planning permission is sought for a period until the expiry of the Maritime Area Consent for the Project on 22 December 2067.

1.2 Project context

Ireland's *Climate Action Plan 2024* proposes to increase the proportion of renewable electricity to up to 80% by 2030 and targets *"at least 5 GW"* of offshore wind energy by 2030. The delivery of the Project will contribute to meeting this key national policy objective.

The Project has been progressed for over 20 years, from the conception of the Project in 2001, through to the acquisition of a Foreshore Licence and subsequent marine based exploratory works in 2005. Environmental assessments were undertaken during the period 2005 to 2007 for the marine elements of the Project culminating in an Environmental Impact Statement (EIS) being prepared and submitted as part of a Foreshore Lease application in February 2007.

A draft Foreshore Lease was issued to the Applicant on 10 November 2010. The Applicant was provided with a grid connection offer under the Commission for Energy Regulation's (CER's) Gate 3 connection process. Firm access was ultimately granted to the Applicant in 2012 (Ref. TG86). In accordance with the provisions of Section 182E of the Act and the associated consenting regime at the time, the Applicant engaged in pre-application consultation with An Bord Pleanála from 2010-2020 (ABP Ref. PL 15.VC0052).

Having met the definition of 'Relevant Project' as defined in the Marine Area Planning Act 2021 (MAPA), (also known as a 'Phase 1 Project'), the Applicant was invited to apply for a Maritime Area Consent (MAC) to the Minister for Environment, Climate and Communications. Following an assessment process the Minister granted a MAC to the project on 22 December 2022 for the occupation of a maritime site for the purposes of the Project.

The MAC (Ref. No. 2022-MAC-001) received from the Minister granted the Applicant permission to construct and operate an Offshore Wind Farm and associated infrastructure (including decommissioning and other works required on foot of any Development Permission for an Offshore Wind Farm). As illustrated in Figure 1-1 below, the location of the maritime site i.e. the consent area that this MAC concerns, constitutes the approximately hexagonal shaped array area that is outlined in red and the associated cable corridor area, the extent of which is outlined in black.

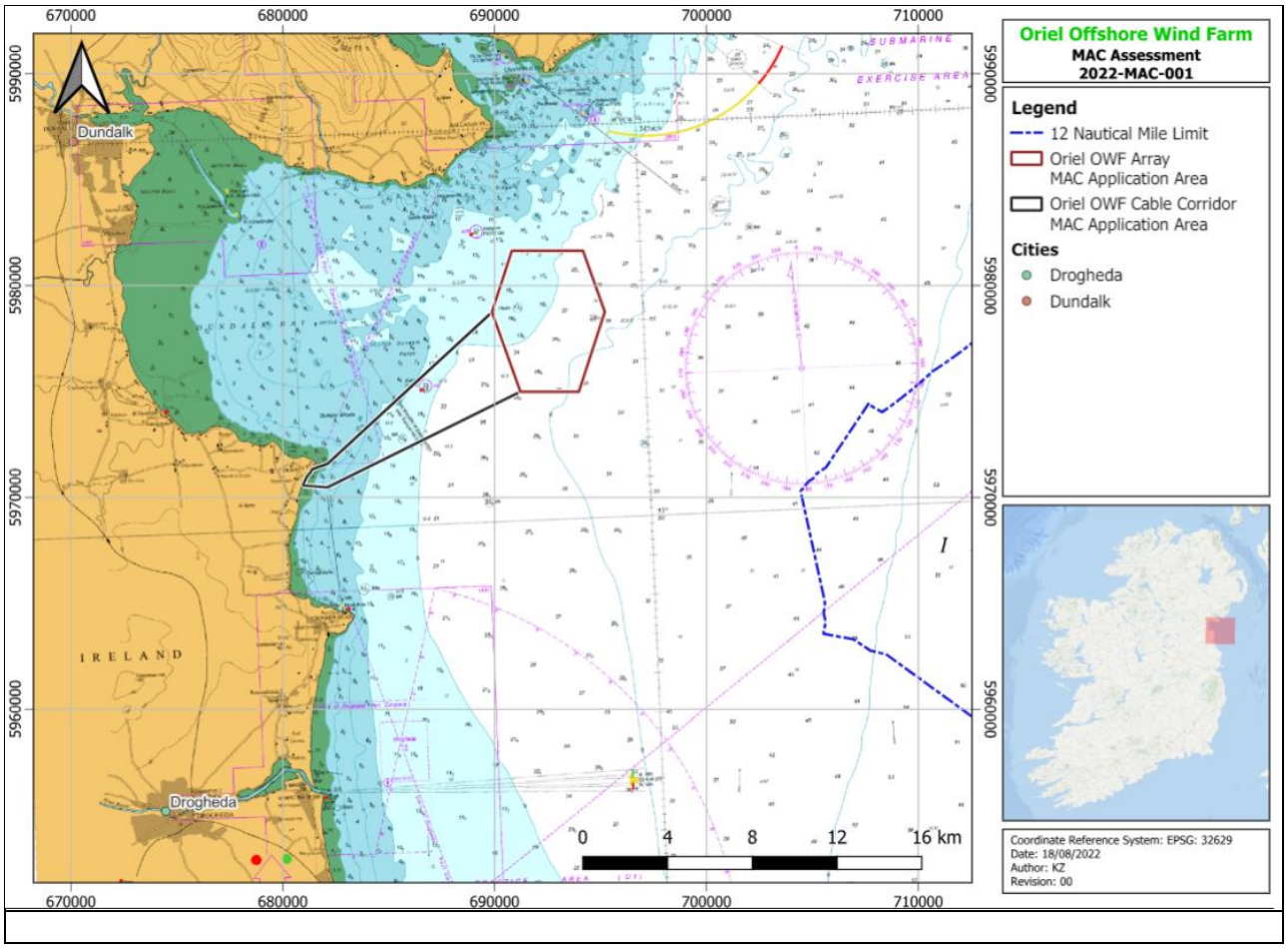


Figure 1-1: Location of the MAC area associated with the Project (not to scale).

1.3 Purpose and structure of the report

The purpose of this Planning Report is to present an overview of the land and marine usage planning aspects and planning issues associated with the Project. It is intended to assist ABP in determining whether the Project is in accordance with principles of proper planning and sustainable development, and accordingly whether permission should be granted for the Project. It references other particulars accompanying the application which are intended for the information of parties to the application and the Board in its determination of this application. The structure and contents of this Planning Report is set out in Table 1-1.

Table 1-1: Planning Report Structure and Contents.

No.	Section Title	Description of Key Contents
1	**Introduction**	Introduction to the Oriel Wind Farm Project, project context, purpose and structure of report, details of the Applicant, details of the project team, summary description of application enclosures.
2	**Need for the Project**	The need for the Project in so far as it is related to the climate imperative, the national target for at least 5 GW of offshore renewable energy, national energy security and other positive impacts arising.
3	**Project Evolution**	Evolution of the Project including the relevant background and a description of key project elements that have changed and remained unchanged over the past 20 years.
4	**Consultation**	Consultation with various stakeholders and how this has fed into the design of the Project.
5	**The Project**	This section provides a description of the site location, a description of the project details including design flexibility, the construction, operational and maintenance, and decommissioning phases and relevant planning history.

No.	Section Title	Description of Key Contents
6	**Key Consenting Legislation**	Key consenting legislation from a marine spatial planning perspective, a Climate Action and Low Carbon Development Act perspective, an Environmental Impact Assessment perspective and an Appropriate Assessment perspective.
7	**Planning and Development Policy Context**	An examination of the Project in the context of relevant European, national, regional and local planning and development policy, objectives and guidance.
8	**Planning Appraisal**	An evaluation of the Project having regard to relevant considerations, policies and objectives.
9	**Conclusion**	Relevant conclusions to aid the decision making process with respect to the Project.

1.4 Details of the Applicant (Oriel Windfarm Limited)

The Applicant, Oriel Windfarm Limited is an Irish company established in 2005 to develop the Project. The Project is a joint venture between Parkwind N.V. (Parkwind) and ESB Wind Development, a wholly owned subsidiary of Electricity Supply Board (ESB). A joint venture agreement has been executed between Parkwind and ESB to formalise the joint development of the Project. Parkwind hold a controlling number of shares in the joint venture company.

The details of the Applicant are:

Registered Name:	Oriel Windfarm Limited
Registered Address:	Digital Office Centre, Balheary Road, Swords, Co. Dublin, K67 E5AO
Company Directors:	Daniel O'Connor, Eric Antoons, François Van Leeuw, Gary Connolly, Richard Scott
Company Registration No.	318186

1.4.1 Parkwind

Parkwind became a partner to the proposed Project in September 2017. Parkwind was founded in Belgium in 2012 as a full life-cycle business that develops, finances, and operates offshore wind farms. The company address in Ireland is Digital Office Centre, Balheary Road, Swords, Co. Dublin, K67 E5AO. Since July 2023, Parkwind has been operating as part of JERA Co., Inc. (hereafter, JERA). JERA is one of the largest power generational companies in the world. Together, Parkwind and JERA have more than a decade of experience and over 1,500 MW of offshore wind assets under operational management and construction in Belgium, Germany, the United Kingdom of Great Britain and Northern Ireland (hereafter, the UK), Taiwan and Japan, in addition to an extensive pipeline of offshore wind projects in development around the world including in Belgium, Germany, Ireland, the UK, Norway, Greece, and Australia/New Zealand.

Parkwind currently has 771 MW under operational management spread across four wind farms in the North Sea and 577 MW under development; it has steadily become one of Europe's leading independent offshore industry companies. Parkwind is recently completed a fifth wind farm in the German Baltic Sea. The Arcadis Ost project is a 257 MW wind farm located north-east of the island of Rügen, Germany.

1.4.2 ESB

The ESB became a partner on the Project in January 2019. ESB is Ireland's leading electricity utility which was established in 1927 and has an address at 27 Fitzwilliam Street Lower, Dublin 2, D02 KT92. It is 96% owned by the Irish Government. As the national electricity provider, ESB invest in wind farm energy in order to deliver long-term social, economic and environmental benefits for the state.

Since the 1980s, ESB have been involved in the development and construction of wind farms in Ireland and the UK, through to their operation and maintenance. Launched in 2023, *Networks for Net Zero Strategy* outlines ESB's commitment to futureproofing Ireland's electricity network and making the country's goal of net zero by 2050 a reality. ESB plan to deliver a fivefold increase in their renewable generation portfolio to 5,000 MW by 2040.

1.5 Overview of project team

The main Agent on behalf of the Applicant is Valerie Brennan, Town Planner with RPS, West Pier Business Campus, Dún Laoghaire, Co. Dublin, A96 N6T7.

The Environmental Impact Assessment Report (EIAR) was co-ordinated by Cathriona Cahill of RPS. Details of contributors to the EIAR are provided within chapter 1: Introduction of the EIAR.

The Habitats Directive Appraisals, notably the Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) were prepared by Dr Miles Newman, Ecologist with RPS.

1.6 Documents submitted as part of the Application

The Applicant has created a website for the purposes of enabling the public to view the plans and particulars of the application for permission: https://www.orielwindfarm-marineplanning.ie. This website is structured, as follows:

- Planning Documents – contains a copy of the Planning Particulars and the subject Planning Report;
- Planning Drawings – contains a copy of the offshore infrastructure drawings, the onshore cable drawings and the onshore substation drawings; and
- Environmental Documents – contains a copy of the EIAR, the Report to Inform Screening for AA and the Natura Impact Statement.

Prior to making this application, the plans and particulars enclosed herewith have been screened with reference to the Planning and Development Regulations of 2001, as amended (hereafter, 'the Regulations'). With regard to the application particulars, we note the following:

A copy of the MAC (MAC No. 2022-MAC-001) that was received from the Minister for Environment, Climate and Communications for all elements of the Project that are located in the marine area is included. In addition, a number of letters of consent are included as part of the Planning Particulars, including a letter from:

- Louth County Council for certain onshore aspects of the project that concern lands that are in their management control;
- Irish Rail;
- Uisce Éireann (formerly Irish Water); and,
- Landowners whose lands are located within the planning application boundary.

The site which is the subject of this application is outlined in red on the Regional Context Map (Drawing No. A01 PE605-D027-038-002 REGIONAL CONTEXT MAP) and Figure 5-2, prepared by RPS. The land which adjoins, abuts or is adjacent to the land to be developed is outlined in blue.

The position of the Site Notices erected at key nodes associated with the Project in order to ensure maximum public awareness of the nature and the extent of the Project are identified on the Regional Context Map. The Site Notice (which is contained on 2 no. A3 sized pages) is situated at 9 no. separate locations.

The documents and drawings listed in Table 1-2 are contained within this application to the Board.

Table 1-2: Application items as submitted.

Items	Contents of Items Submitted
Planning Particulars	Cover Letter Schedule 1: Planning Application Form Schedule 2: Drawings Schedules Schedule 3: Ordnance Survey Map Reference Numbers Schedule 4: Copy of Newspaper Notices and Site Notice Schedule 5: Letters of Consent Schedule 6: Copy of Marine Area Consent Schedule 7: Form 22 Design Opinion Schedule 8: Schedule of Pre-Application Consultations Schedule 9: Schedule of Notified Prescribed Bodies, Notified Transboundary States and Sample Copy of Notification Schedule 10: Copy of EIA Portal Confirmation Notice
Planning Report	Planning Report (including, *inter alia,* Appendix A containing a National Marine Planning Framework Compliance Report and Appendix B containing maps of the Relevant Planning History)
Drawings	Drawings and plans illustrating the offshore and onshore aspects of the Project
EIAR	Environmental Impact Assessment Report[2] • Volume 1: EIAR Non-Technical Summary; and • Volume 2: EIAR Holistic Assessment of All Elements (includes appendices)
Appropriate Assessment	Report to Inform Screening for Appropriate Assessment Natura Impact Statement (NIS)
Spatial Data	Application Site Boundary in shapefile format
Soft Copy of Application	Electronic machine readable (soft) copy of all documents and drawings associated with the Application

[2] Note that a confidential appendix including details on survey results indicating the location of species vulnerable to persecution has also been supplied to ABP.

2 NEED FOR THE PROJECT

2.1 The Climate Imperative

The United Nations COP 28 conference which took place in November – December 2023 recognised international scientific research which indicates that global greenhouse gas emissions need to be cut 43% by 2030, compared to 2019 levels, to limit global warming to 1.5°C. The *Climate Action Plan 2024* (CAP 2024)[3] notes, *inter alia*, that the world's climate is changing rapidly with temperatures increasing faster since 1970 than in any other 50-year period over at least the last 2,000 years. Met Éireann's Annual Climate Statement for 2023 has revealed that 2023 was the warmest year on record in Ireland, with above average rainfall.

The energy sector is a significant generator of greenhouse gas. Offshore wind energy can play a key role in helping to achieve national renewable energy and decarbonisation targets through use of renewable energy sources. These targets are driven by European policy, with the European Union (EU) setting overall renewable energy targets for the EU, and specific targets being set for each member state. The Revised Renewable Energy Directive which came into force on 20 November 2023 sets an overall renewable energy target of at least 42.5% binding at EU level by 2030. The CAP 2024 targets 80% renewable electricity in Ireland by 2030. The widespread development of offshore wind energy is a vital vehicle for achieving our renewable energy targets.

The Project can also contribute towards Ireland's net-zero emissions targets and our transition to a low-carbon and climate-resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy as underpinned by the *Climate Action and Low Carbon Development Act 2015,* as amended. This Act requires relevant authorities to perform their functions in a manner that is consistent with the more recent CAP, in so far as practicable. In addition to the economic gains of pursuing this development, greenhouse gas emissions would be reduced through the displacement of fossil fuel-related energy usage. Energy demand is increasing across all sectors in Ireland. However, in order to become sustainable and carbon neutral, these energy demands need to be offset by electricity generated from renewable sources.

Furthermore, the other key national plans such as the *National Planning Framework* (NPF) and the *National Development Plan 2018 – 2027*, call for increased electrification of the heat and transport sectors. Schemes such as the Renewable Electricity Support Scheme (RESS) aims to decarbonise electricity generation. This would strengthen Ireland's overall performance in terms of sustainable development, in line with the United Nations Sustainable Development Goals – particularly Goal 7 (Affordable and Clean Energy) and Goal 13 (Climate Action) (UN, 2015), inevitably leading to improved environmental and societal wellbeing.

2.2 National target of at least 5 GW of Offshore Renewable Energy

In response to the climate imperative, the government has set at national target of at least 5 GW (i.e. 5,000 MW) of offshore wind energy by 2030 in the CAP. The *National Marine Planning Framework* (NMPF), which is Ireland's national marine spatial plan, published in June 2021, supports offshore renewable energy development, recognising it as a pathway to decarbonisation and it also includes the target for at least 5 GW. The decarbonisation pathway to 2030 as set out in the *Programme for Government Our Shared Future* also outlines that at least 5 GW of offshore wind is required in the renewable electricity mix by 2030 off Ireland's eastern and southern coast.

At present, there are just 0.025 GW / 25 MW of offshore wind energy being generated in Ireland. In proposing to generate up to 0.375 GW / 375 MW, which would represent approximately 6.6% of the 5 GW of offshore wind energy objective, the Project can help enable the achievement of the national target when operational.

In addition, the Project has a number of advantages meaning that it can contribute to meeting 2030 renewable energy targets:

- Significant preparatory work including extensive consultation and long running environmental assessments with surveying and data collection have been undertaken;

[3] Currently published in draft format.

- The Project was granted a MAC by the Minister for the Environment, Climate and Communications (dated 22 December 2022);
- The Project is located along the east coast where the grid infrastructure is already in place to accommodate the energy being generated; and
- The Applicant includes experienced operators (Parkwind and ESB) who are strategic partners to drive the Project forward.

2.3 National Energy Security

Energy security is a cornerstone of national societal and economic well-being. While this has long been understood at EU and national levels, recent events, including the Covid-19 pandemic and the Russian invasion of Ukraine have reinforced the risks inherent in long supply chains and dependence upon other states for energy sources.

REPowerEU, presented by the European Commission in May 2022, is a joint European action for more affordable, secure and sustainable energy. It is an emerging policy that has arisen from the global energy market disruption caused by Russia's invasion of Ukraine. The REPowerEU Plan seeks to accelerate clean energy transition; diversity energy sources; and reduce demand. A key objective of REPowerEU is to reduce dependence on fossil fuels and increase European renewables target for 2030 from 40% to 45%.

In the interest of REPower EU and national energy security, the Department of the Environment, Climate and Communications published *Energy Security in Ireland to 2030* in November 2023. This report notes that Ireland is currently one of the most energy import dependent countries in the EU, having imported 77% of its energy supply in 2021. It further notes that, "*investment in a diverse number of renewable energy sources, Ireland will reduce its dependence on imported fossil fuels and dramatically reduce its vulnerability to energy shocks."*

Ireland's *Offshore Renewable Energy Development Plan* (OREDP) identifies the Irish marine area as one of the most productive in Europe, with a potential for large scale development of offshore renewable energy technologies. Therefore, the development of the Irish offshore wind energy sector has the potential to provide Ireland with a reliable and resilient energy source for the foreseeable future.

2.4 Positive Economic Impacts

From an economic perspective, *The EU Blue Economy Report 2023* identifies marine renewable energy (offshore wind) development to be an established sector in Europe since 2021 and an increasingly important area for employment, gross value addition, gross profit, net investment in tangible good and turnover. While the economic advantages of the development of marine renewable energy in Ireland are significantly underdeveloped when compared to Germany, Denmark and the Netherlands, it is clear that the development of offshore wind farms in Ireland will have a very positive impact on the economy broadly through the provision of clean, reliable, cost-effective energy and a reduction in the need to import fossil fuels.

In addition, the development of the Project will generate employment directly at construction, operational and maintenance, and decommissioning phases, while also generating indirect and induced employment. Chapter 18: Population and Human Health of the EIAR supports the view that there is the potential for the Project to provide minor to moderate beneficial effects in relation to population and human health which are significant in EIA terms.

Offshore wind energy development therefore has a critical role to play in contributing to national and EU targets, with the Project capable of delivering up to 375 MW of offshore wind energy for Ireland.

3 PROJECT EVOLUTION

3.1 Background to Original Proposal

The Oriel Wind Farm Project was first conceived in 2001. Details in relation to the alternatives considered and the proposed overall design and general layout are set out in chapter 4: Consideration of Alternatives of the EIAR. The Project's location was selected following an assessment of environmental and technical constraints. While the Project has evolved and now benefits from having strengthened legislation and national policy in addition to technological developments (notably, it can now deliver a MEC of 375MW as opposed to 330MW), the project offshore location has remained consistent and continues to represent the optimal design and layout requirements in light of these developments.

3.1.1 Foreshore Licence

In 2005, the Applicant secured a Foreshore Licence from the Department of Communications, Marine and Natural Resources which granted permission to carry out technical work to investigate the suitability of an area to the east of Dundalk Bay for the construction of on offshore wind farm. Having received this Licence, the Applicant completed a number of environmental and technical assessments during the period 2005-2007, including a geotechnical site investigation, an engineering assessment, an Environmental Impact Statement (i.e. an EIS which is the equivalent of an EIAR) and an NIS, all of which were completed by 2007.

3.1.2 Foreshore Lease

In February 2007, the Applicant applied for a Foreshore Lease to the then Department of Communications, Marine and Natural Resources to construct an offshore generating station, under the Foreshore Act. The application was accompanied by the EIS.

The policy of that Department at the time was to agree a form of Foreshore Lease with the Applicant and confirm to the Applicant in an accompanying letter ('a Conditional Offer Letter') that, subject to satisfying certain conditions, including obtaining all necessary rights and consents for the Project such as onshore planning approval and a grid connection, that the Applicant would be offered a Foreshore Lease in the form appended to the letter. A draft foreshore lease with a draft conditional offer letter (unsigned) was issued to the Applicant on 10 November 2010 that was subject, *inter alia*, to planning permission being granted for the onshore elements. The Applicant has continued to consult with the Department on Foreshore Lease related matters since 2010.

During 2011, the emergent economic conditions resulted in the introduction of the proposed offshore tariff scheme being postponed in January 2012 by the then Minister for Communications, Energy and Natural Resources. As a result of this, the Applicant was forced to put the onshore planning process on hold until further clarification on a route to market was established.

As a result of the offshore tariff scheme being withheld in 2012, the Project rested in abeyance with the Department. However, during this time, the Applicant continued to engage with relevant Department officials to find a way forward.

3.1.3 Onshore Infrastructure

A number of onshore cable routes and possible grid connection points were identified in the EIS that was prepared in 2007, however, these were not assessed as the final connection point, the offshore cable route and the location of the landfall had not yet been selected.

Subsequently, possible landfall locations were further considered and a preferred site in the Castlebellingham area emerged. An Appropriate Assessment (AA) Screening Report of this landfall site was prepared in 2010 which concluded that the proposed offshore / onshore transition bay, at that time, would not negatively impact on the integrity or conservation objectives of the nearby Special Protection Area (SPA) i.e. (the Dundalk Bay Site Code: IE004026).

3.1.4 Securing and Retaining a Grid Connection Offer

In 2007, the Applicant applied to EirGrid to connect a 330 MW wind farm to the electricity transmission system. In 2011, the Applicant received a grid connection offer for 330 MW from the Commission for Energy Regulation (CER). In 2012, the Applicant accepted a (Gate 3) firm grid connection offer from the CER on a 'contestable' basis. This enabled the Project to undertake the planning and construction of the shallow connection assets (project specific assets) required to connect the Project to the existing grid infrastructure. Between 2010 and 2016, the Applicant continued to make relevant grid connection offer payments.

3.1.5 Site and Route Selection

During 2011, the Applicant undertook a substation site and cable route selection assessment which included:

- Substation location options in terms of proximity to the existing 220 kV Louth to Woodland overhead transmission line; and
- Underground grid connection cable route options from the landfall to the substation location under the existing 220 kV transmission line.

A number of potential cable routes were considered and assessed from the offshore substation to the shore along with a consideration of different landfall locations. Following the completion of constraint mapping, consultation with statutory and local organisations, site surveys, etc., an emerging preferred substation site and grid connection route was established. The onshore element of the preferred underground cable route stretched from the landfall to the 220 kV transmission system along a route that primarily concerned the existing road network as this avoided the need for any new overhead power lines.

Following on from this, RPS undertook a further site and route selection review in 2019. This process involved a consideration of all relevant environmental, planning and technical constraints. A full description of this process is contained in chapter 4: Consideration of Alternatives of the EIAR. Ultimately the offshore cable route between the offshore substation and the landfall located approximately 700 m south of Dunany Point, the landfall and the onshore cable route between the landfall and the connection point at the Townland of Stickillin emerged as the optimum site and route for numerous reasons, including:

- It minimises effects on all European Designated Sites;
- It avoids established centres of population;
- It accords with the rural housing policy zoning objectives within which the onshore aspects of the Project are located; and
- It has the required space and accessibility to accommodate all temporary and permanent works.

3.1.6 Grant of Maritime Area Consent

The *Maritime Area Planning Act 2021* (MAPA) created a new State consent, the Maritime Area Consent (MAC), which entitles the holder of a MAC to occupy a specified part of the maritime area. In 2022, the Minister for the Environment, Climate and Communications invited MAC applications for Phase One projects relating to 'relevant maritime usage'.

The MAPA defines 'relevant maritime usage' as any proposed maritime usage which is for the purposes of producing, from wind, offshore renewable energy where the usage is either;

a) the subject of an application for a foreshore authorisation made before 31 December 2019 and which has not been finally determined, or abandoned or withdrawn, before the coming into operation of section 101,

b) the subject of a foreshore authorisation, or

c) was, on 31 December 2019, the subject of—

i. a valid connection agreement from a transmission system operator, or

ii. a confirmation by a transmission system operator as being eligible to be processed to receive a valid connection offer.

As the project met the definition of 'relevant maritime usage' it was invited to apply for a MAC as a 'Relevant Project'. Following an assessment of an application made by the Applicant to the Department of Environment, Communications and Climate, the 'Relevant Minister' granted the Applicant a MAC on 22 December 2022 for the occupation of a maritime site for the purposes of the Project. The MAC received from the Minister granted the Applicant permission to construct and operate an Offshore Wind Farm and associated infrastructure (including decommissioning and other works required on foot of any Development Permission for such Offshore Wind Farm), subject to all necessary planning consents being secured.

The first Offshore Renewable Electricity Support Scheme (ORESS) subsidy auction in the state was held in May 2023. While the Applicant was not successful in this first ORESS auction, this has not affected the intent of the prospective applicant or the anticipated timelines for the early development of the Project. The Project can be realised under a 'Merchant Route' to market as provided for in the MAC and Commission for Regulation of Utilities Decision, CRU 2023156, Grid Connection Pathway for Phase 1 Offshore Wind (Merchant projects).

3.2 Evolution of Proposed Design

Advances in offshore wind farm technology and design coupled with the feedback from stakeholder consultation have provided opportunities for the design proposals associated with the Project to be enhanced, while the overall Project has remained consistent. The project location and the approximately 27.7 km^2 area within which the wind turbine array will be situated remains unchanged. Key project elements that have been enhanced over the last 10 years are:

- Arising from technological advances, the number of offshore WTGs proposed has reduced from 55 to 25 representing a net reduction of 30 WTG;
- A preferable turbine layout is now possible, albeit within the current array boundary (further details are included in chapter 4: Consideration of Alternatives of the EIAR);
- An alternative turbine specification and the use of a monopile foundation for each WTG and the offshore substation is now possible; and
- A landfall has been identified that minimises effects on all European Designated Sites (further details are included in chapter 4: Consideration of Alternatives of the EIAR).

4 CONSULTATION

4.1 Introduction

The consultation on the Project has sought to ensure that the requirements have been met and exceeded. The process has ensured that clear, factual information has been made available to all and that an open and transparent approach has been undertaken at all times. The consultation used a number of engagement methods both online and via in person events. Where practicable, the results of this consultation has been incorporated into the design.

Throughout the pre-application phase of the Project and as part of the preparation of the EIAR, an extensive stakeholder consultation process was undertaken. This included public consultation events and engagement with key statutory and non-statutory stakeholders. Chapter 6: Consultation of the EIAR sets out an account of the consultation that has taken place with various stakeholders and the *Public and other Stakeholders Consultation Report* contained in appendix 6-1 of the EIAR provides further details in relation to the consultation that has been undertaken. It also sets out how particular items raised during the consultation process have been considered in the EIAR. The focus of the subject Planning Report is outlining firstly pre-application consultation that has taken place with relevant Planning Authorities from a planning perspective and also setting out the consultation that has taken place with directly impacted landowners, members of the public, prescribed bodies, utilities, public bodies, interested bodies and transboundary consultees.

4.2 Pre-Application Consultation with An Bord Pleanála

Under the previous consenting regime, Section 182E of the Act required that prior to making an application for approval for an electricity transmission development, a prospective applicant should enter into pre-application consultation with the Board in relation to the Project. Accordingly, pre-application consultation meetings were held between representatives of the Board and the Applicant on seven occasions via Case No. PL 15.VC0052. While these meetings occurred prior to the commencement of the Maritime Area Planning Act 2021, the Planning and Development, Maritime and Valuation (Amendment) Act 2022 and the Planning and Development Foreshore (Amendment) Act 2022, all of which have resulted in a new consenting regime for developments in the maritime area, the form and nature of these meetings was similar to the Section 287 pre-application consultation meetings that were held in relation to the subject application.

A list of all of the dates during which the Applicant held pre-application consultation with the Board is set out in Table 4-1, together with the Applicant's summary of the key matters that were discussed at those statutory pre-application consultation meetings. The reason for including this information in the subject report is to demonstrate that early feedback that was received from the Board informed the overall project.

Table 4-1: Pre-Application Consultation with the Board Under the Previous Consenting Regime.

No.	Dates	Key Matters Discussed with Representatives from the Board from 2010 - 2020
1	03/12/2010	The need for and benefits of the Project. Updates on Foreshore Lease Application and EIS lodged by the Applicant in 2007 and the project consenting timeline envisaged. Key characteristics of the proposal, the project constraints, the substation types, the proposed consultee list and the project consenting requirements and timeline.
2	01/03/2011	Updated project details including potential substation location, potential grid connection route corridor options and substation design options. The planning consenting requirements of the Project.
3	05/07/2011	Updated project details including the substation and the grid route corridor. Update on 1st round of statutory consultations completed and proposed series of 2nd round statutory consultations. Updates on EIA related work undertaken to date and proposed to be undertaken. The planning consenting requirements of the Project. ABP gave the preliminary view that the Project is SID.
4	18/08/2011	The planning consenting requirements of the Project. ABP reiterated preliminary view that the Project is SID. The proposed list of prescribed bodies to be notified about the proposal.

No.	Dates	Key Matters Discussed with Representatives from the Board from 2010 - 2020
5	13/02/2018	The Applicant introduced Parkwind as its new strategic partner and updates were provided on the process of finalising the Foreshore Lease. The planning permission, EIA, AA and consultation requirements of the project. ABP reiterated the preliminary view that the Project is considered to be SID.
6	03/10/2019	The Applicant introduced RPS as now being the project's lead consultants and noted that ESB are now a strategic partner to Parkwind. Updates were provided on consultations that have taken place since the last meeting with the Department of Housing Planning and Local Government. Updates were provided on progress in relation to environmental baseline surveys and studies and how the findings were influencing the evolution of the project design process. ABP committed to coming back in relation to the extent of their jurisdictional authority.
7	27/07/2020	Agreement was reached that more pre-application meetings would likely be required given the fluid situation regarding marine planning legislation. Updates were provided regarding Client initiatives that were being progressed in order to further minimise the visual impact of the Project and avoid the project being located within a Natura 2000 Designated Site. Updates were provided in relation to ongoing public and landowner engagement.

Following on from this and under the current consenting regime as set out in Section 287 of the Act, the Applicant has engaged in four pre-application consultation meetings with the Board via Case No. ABP-315803-23. A list of all of the dates during which the Applicant held those pre-application consultation with representative from the Board is set out in Table 4-2, together with the Applicant's summary of the key matters that were discussed at those statutory pre-application consultation meetings.

Table 4-2: Pre-Application Consultation with An Bord Pleanála Under the Current Consenting Regime.

No.	Dates	Key Matters Discussed with Representatives from the Board during 2023
1	15/06/2023	General overview of Project, the history of the Project and the details of the Project. The fact that a Circular is due from the Department of Housing, Local Government and Heritage regarding Design Flexibility. The Applicant confirmed that the RESS outcome does not affect the project timelines. ABP requested that transboundary issues be dealt with fully in the application.
2	31/08/2023	Updates regarding consultation meetings held with other Phase 1 Projects off the east coast to ensure alignment. ABP asked that the manner in which the project is consistent with the 92 objectives in the NMPF be set out in application documentation. A dumping at sea licence may be required, if so, this should be referenced in public notices. Any transboundary effects arising should be referenced in public notices. A separate Section 287A meeting will be scheduled to discuss design flexibility. Procedural matters relating to the application were discussed at a high level.
3	09/11/2023	The Applicant advised ABP that they had submitted a Request for an Opinion on Design Flexibility to the Board. Advice on various EIAR matters was provided by the Board. The likely submission date for the application. It was suggested that an additional Section 287 pre-application consultation meeting be held in December to focus on procedural requirements associated with the application.
4	11/12/2023	The focus of the meeting was on procedural items relating to the submission of the planning application. The Board advised that it intends to close the Section 287 and the Section 287A consultation and complete the relevant Inspectors' Reports. Thereafter, the Board shall consider these reports and issue relevant correspondence to the prospective applicant. The application must be consistent with any Opinion issued by the Board under Section 278B of the Act. The prescribed bodies will be confirmed by the Board in future correspondence with the Applicant regarding the closure of pre-application consultation.

4.2.1 Addressing Matters Raised by ABP during Pre-Application Consultation in 2023

The project's design team and the Applicant has had due regard to the various matters that were raised by the Board during the pre-application consultation meetings that took place in 2023 and these are reflected in the design, the content of the EIAR, the content of the AA Reports and all of the application documentation. Amongst the high level matters that have been undertaken in response to the pre-application consultation include:

- Systematically assessing the application on the basis of each of the overarching marine planning policies and the sectoral marine planning policies for offshore renewable energy contained in the NMPF using the best available data and science in the assessment – please refer to Appendix A of this report which contains further details in this respect;
- Consulting with the project teams of other Phase 1 projects located off the east coast, particularly in relation to potential cumulative effects; and
- The activities proposed for the installation of the wind turbine foundations and the subsea cables will be the subject of a separate Dumping at Sea Permit obtained from the Environmental Protection Agency (EPA).

In preparing the subject application documentation, the project team have acted upon the recommendations of ABP. In this respect, the Applicant has:

- Provided sample drawings to the Board prior to the lodgement of the application to ensure that they are acceptable to the Board;
- The statutory notice published in 1 no. national newspaper and 1 no. local newspaper and a sample site notice were issued to the Board prior to the submission of the application to ensure that all dates referenced are correct;
- Provided a standalone and clearly titled website containing an electronic copy of the entire application;
- Referenced that a separate Dumping at Sea Permit will be applied for in statutory notices;
- Indicated in the notices that the application will be available for public inspection and that the time period for making submissions or observations by members of the public is eight weeks;
- The service of notice of application to the prescribed bodies includes a statement that the body can make a submission to the Board by the same deadline as specified in the statutory notice;
- Ensured that letters of consent that the Applicant has received from landowners have been included in the planning application pack in the appropriate manner having regard to EU General Data Protection Regulation 2016/679 (i.e. relevant GDPR legislation);
- Provided the requested number of hard copies and electronic copies of the application to ABP and Louth County Council and a consolidated number of drawings has been provided as part of the planning pack; and
- The proposed approach to community gain is addressed in the application documentation (see section 8.9 of this report).

A table of topics raised during pre-application consultation with ABP is included in chapter 6: Consultation of the EIAR (vol. 2A).

4.2.2 Pre-Application Consultation in Relation to Design Flexibility

Owing to the complex nature of offshore wind developments which concern the constantly moving marine environment, certain details of a proposed scheme may be unknown to the Applicant at the time of submitting an application to the Board, including for example, the exact optimal location for installation of a foundation for a wind turbine. Coupled with this, particularly where technological developments are evolving at pace, it may not be possible to confirm the final details of a proposed development at the point in time when the planning application is being submitted.

Accordingly, a degree of flexibility at planning application stage is required for certain options and/or parameters or both options and parameters that are based on known unknowns. This is an accepted position

and one that has been set out in Circular Letter: MPP 01/2023 issued to the Board by the Department of Housing, Local Government and Heritage on 17 July 2023 and provided for in the Act.

With regard to design flexibility and pursuant to Section 287A of the Act, the Applicant submitted an application for an opinion under Section 287B of the Act, as amended by the Planning and Development, Maritime and Valuation (Amendment) Act 2022, for consideration of the design flexibility required for the Project. Those items unlikely to be confirmed at the time of the Application include:

1. The final exact location of each offshore wind turbine and the offshore substation;
2. The final height of offshore infrastructure;
3. The final route and length of the offshore export cable and offshore inter-array cables;
4. The location and layout of the landfall transition joint bay; and
5. The final design for the type and siting of outdoor equipment within the proposed onshore substation compound.

A Section 287A pre-application consultation meeting was held with the Board on 11 December 2023. During this meeting, representatives from ABP advised that they are of the opinion that it is appropriate that the proposed application be made and decided before the Applicant has confirmed certain details that are unlikely to be confirmed at the time of Application.

The reasons provided by ABP states that this is due to ongoing advances in technology and recognition of the need to install project infrastructure efficiently, at optimal locations within the context of specified parameters and options.

4.3 Pre-Application Consultation with Louth County Council

The Applicant has held a number of pre-application consultation meetings with various departments of Louth County Council. Louth County Council have provided a letter of consent to include any lands that are under the effective control of Louth County Council as part of the application. A copy of this letter of consent which provides a list of the relevant land folios is contained in Schedule 5 of the Planning Particulars. Table 4-3 sets out the key matters discussed in relation to these meetings. In addition to these meetings, the Applicant has liaised with various representatives of Louth County Council by telephone and email on numerous other occasions during the evolution phase of the Project.

Table 4-3: Pre-Application Consultation Meetings with Louth County Council.

Department / Entity	Key Matters Discussed	Meeting Dates
Chief Executive Officer and Director of Services	• An overview of the Project presented. • It was noted that Louth County Council (LCC) are preparing a Climate Change Adaptation Plan and new Louth County Development Plan. The Applicant advised they may make submission to these documents in so far as they may be relevant to the Project. • LCC suggested that the Project be presented to Councillors. Accordingly, the Applicant gave a presentation about the Project, followed by a Question and Answers Session, to Ardee District Councillors on 14/01/2021.	23/07/2019
Roads	• LCC representatives were briefed on requirements for onshore cable route and onshore substation.	12/11/2019
Land and Legal	• Areas of LCC lands under consideration for the onshore cable route were presented and discussed.	30/03/2020
Roads and Planning	• An update was provided on project design, expected timeline and underground cable construction.	02/12/2020
Director of Services	• A presentation was given to the Directors of Services on the status of the Project.	01/02/2022
Roads	• The project design along roads and the role of LCC and TII was discussed.	04/09/2023
Chief Executive Officer and Management Team	• An update on the status of the Project, the design following consultations and the expected timeline for the making of an application was given.	23/01/2024

4.4 Pre-Application Consultation with Other Local Authorities

While the Project is in Co. Louth, the Applicant has also held pre-application consultation meetings with neighbouring Meath County Council and Newry, Mourne and District Council. The key matters discussed and the dates that these meetings were held is set out in Table 4-4.

Table 4-4: Pre-Application Consultation Meetings held with Other Local Planning Authorities.

Local Authority	Key Matters Discussed	Meeting Date(s)
Meath County Council	• An overview of the Project was provided by the Applicant. • Meath County Council representatives noted that new Meath County Development Plan and Climate Change Strategy were being prepared.	01/10/2019
Newry, Mourne and District Council	• Newry, Mourne and District Council representatives advised that Newry, Ardglass and Kilkeel should be included in any further communications. • The focus of discussions during the meeting was on fishing related matters. The Council also asked whether any Community Fund would include Northern Ireland. • The consultees indicated that the visual impact of the Project was not a major issue for them. • The presentation was well received and the fact that the Applicant engaged in transboundary consultation with the Council was appreciated.	09/02/2021

4.5 Consultation with Landowners

The Project concerns proposed works on privately owned lands in addition to works on lands that are in the management control of LCC and St. John of Gods. Accordingly, the Applicant has consulted with and all directly impacted landowners and received a letter of consent by all directly affected landowners. All letters of consent that have been received are included as part of the Planning Particulars. For General Data Projection Regulation (GDPR) reasons, a redacted version of the letters of consent that have been received from private landowners is being submitted to ABP for inclusion on the public file (and an unredacted version is being sent by the Applicant for the information of ABP only).

4.6 Consultation with Members of the Public

The Act does not specify the extent or nature of consultation that should be undertaken with the public prior to the lodgement of an application for approval. Notwithstanding this, in the interest of best practice and to ensure the inclusion of the observations from members of the public in the design process, an extensive programme of public consultation was undertaken during the pre-application phase of the Project.

While public consultation had taken place as part of Case No. PL 15.VC0052, as part of Case No. ABP-315803-23, two main public consultation events were held in 2021 and 2023. These sought the views of the wider public on the Project. Overall, both the 2021 and 2023 consultations achieved their intended goals of increasing awareness of the Project and seeking feedback from the public regarding the Project. The full details of this exercise is provided in chapter 6: Consultation of the EIAR and appendix 6-1 of the EIAR.

Further to the significant level of consultation undertaken in relation to the Project to date, a further public information exercise will be undertaken to inform all stakeholders of the Project when the application is submitted to the Board. The purpose of this information exercise, which is in addition to the statutory notification procedures required in relation to the Project, will be to inform the public of the development proposals, the impacts arising and to ensure that they are aware of the opportunities available to them to participate in the development assessment process. The Project's standalone website (www.orielwindfarm.ie) includes contact details for the developer, an option to receive regular email updates, and details of alternative ways to engage on the project.

Post lodgement of the application, there will be a statutory eight week long consultation period when all application documentations will be available to review in hard copy at the offices of ABP and LCC. The application may also be viewed or downloaded on the following website:

www.orielwindfarm-marineplanning.ie.

All interested parties can make submissions or observations to the Marine/Climate Section of the Board during this eight week public consultation period relating to:

i. The implications of the proposed development for maritime spatial planning, and

ii. the implications of the proposed development for proper planning and sustainable development, and

iii. the likely effects on the environment or any European site of the proposed development, if carried out.

Submissions or observations made to the Board must include the following information:

i. The name of the person making the submission or observation, the name of the person acting on his or her behalf, if any, and the address to which any correspondence relating to the application should be sent,

ii. the subject matter of the submission or observation, and

iii. the reasons, considerations and arguments on which the submission or observation is based in full. (Article 5 of the Planning and Development Act (Marine Development) Regulations 2023 refers).

Any submissions or observations which do not comply with the above requirements cannot be considered by the Board. The Board may at its absolute discretion hold an oral hearing on the application.

4.7 Consultation with Prescribed Bodies

As required by the Planning and Development (Maritime and Development Regulations) 2023, the Applicant consulted with the full list of Prescribed Bodies set out in Table 4-5 on a variety of meeting dates. The details of these meetings are contained in chapter 6: Consultation of the EIAR. Also, within each topic chapter of the EIAR, there is a specific table under the sub-heading *"Consultation"* that outlines any feedback / issues raised and where they have been addressed in the chapter.

Table 4-5: Consultation with Prescribed Bodies.

Name of Prescribed Body	Dates of Consultation
Minister for Housing, Local Government and Heritage	May 2023
An Taisce	September 2019
Commissioner of Irish Lights	July 2019, September 2019, February 21, October – November 2022, January – March 2023
Commission for Regulation of Utilities	September 2019
Eastern and Midland Regional Assembly	May 2023
EirGrid	September 2019
Fáilte Ireland	September 2019
Fingal County Council	September 2019
Health and Safety Authority	September 2019
Inland Fisheries Ireland	2019, 2021
Irish Aviation Authority	September 2019, February 2021, November 2022, January – March 2023
Irish Coastguard	August 2019, September 2019, February 2021, October – November 2022, February 2024
Louth County Council	July 2019, September – November 2019, September 2022, September 2023, January 2024
Marine Institute	September 2019 and March 2021
Meath County Council	September 2019
Minister for Agriculture, Food and the Marine	May 2023
Minister for Defence	May 2023
Minister for Environment, Climate and Communications (DECC)	May 2023
Minister for Rural and Community Development	May 2023
Minister for Transport	May 2023

Name of Prescribed Body	Dates of Consultation
National Monument Service (NMS) Underwater Archaeology Unit (UAU)	2020 (UAU) 2021 and 2023 (NMS)
National Parks and Wildlife Service (NPWS)	2019, 2020, 2021, 2022 and 2023
National Transport Authority	September 2019
The Environmental Protection Agency	September 2019, 2021, 2022, 2024
The Maritime Regulatory Authority	May 2023
Sustainable Energy Authority of Ireland	September 2019

4.8 Consultation with Transboundary States

During the pre-application phase of the Project, consultation has been undertaken with a variety of countries (i.e. Transboundary States) located both within the UK and outside the UK. More specifically, as set out in Table 4-6, transboundary consultation as taken place with Northern Ireland, Great Britain and the Isle of Man regarding the potential for transboundary impacts from the Project.

Table 4-6: Transboundary Countries Consulted with Regarding the Potential for Transboundary Impacts.

Transboundary States	Name of Transboundary Consultee	Dates of Consultation
Northern Ireland	Department of Agriculture, Environment and Rural Affairs (DAERA)	2019 and 2023
	Department of Infrastructure	2023
	Loughs Agency	2019 and 2023
Great Britain	Ministry of Housing, Communities and Local Government	2023
Isle of Man	Department of Environment, Food and Agriculture	2019, 2023
	Department of Infrastructure	2023, 2024

Feedback was provided by DAERA in 2019, as part of the EIA scoping process and a further response was provided in 2023. The Loughs Agency, the Northern Ireland Department of Infrastructure and the Isle of Man (Infrastructure) provided a response in 2023. Further details in relation to transboundary consultation is set out in chapter 6: Consultation of the EIAR.

4.9 Consultation with Stakeholders

Consultation was undertaken with a wide volume of local, regional and national stakeholders at part of the EIAR Scoping Stage of the Project. The form of this consultation included issuing the EIA Scoping Report (RPS, 2019) with a request for feedback on the proposed content of the EIAR and on the proposed assessment methodologies. Table 4-7 lists the 116 no. stakeholder entities who were consulted with in this manner. The responses received have been considered as part of the topic assessments of the EIAR (see volume 2B and 2C). Details of where in the EIAR the items raised have been addressed are set out in Table 6-1 of chapter 6: Consultation of the EIAR (vol. 2A).

Table 4-7: Organisations Consulted with as Part of EIAR Process.

Organisations Consulted with as part of the EIAR Process		
Airspeed	EirGrid	Minister for Agriculture, Food and the Marine
An Taisce	Environmental Protection Agency	Minister for Culture, Heritage and the Gaeltacht
Anglo Northern Ireland Fish Producers Organisation	Ericsson	Minister for Defence
Arqiva	ESB	Minister for Foreign Affairs
Atkins Global	ESB Networks	Minister for Housing, Local Government and Heritage
Bat Conservation Ireland	Fáilte Ireland	Minister for Housing, Planning and Local Government

Organisations Consulted with as part of the EIAR Process		
Belfast City Airport	Fingal County Council	Minister for Rural and Community Development
Belfast International Airport	Gas Networks Ireland	Minister for the Environment, Climate and Communications
BirdWatch Ireland	Geological Survey Ireland	Minister for Transport
Irish Brent Goose Research Group	Greenore Port	Ministry of Defence (UK)
Bord Iascaigh Mhara	Health & Safety Authority	2RN
BT	Health Service Executive	National Monuments Service
Carlingford Lough Commissioners	Heritage Council	NPWS
Carlingford Lough Yacht Club	Imagine Group	National Transport Authority
Carlingford Sailing Club	Industrial Development Authority of Ireland (IDA)	National Air Traffic Services
Celtic Adventures Ltd.	Inland Fisheries Ireland (IFI)	Netshare
Canadian Helicopters Corporation	Irish Powered Paragliding and Handgliding Association	Northern Ireland Fish Producers Organisation
Civil Aviation Authority (UK)	Irish Aviation Authority (IAA)	ObSERVE
Clogherhead Fisherman's Association	Irish Coast Guard	Ofcom (UK)
Clogherhead Fishing Co-operative	Irish Cruising Association	Office of Public Works
Commission for Regulation of Utilities	Irish Cruising Club	Ronaldsway Airport
Commissioners of Irish Lights	Irish Environment Network	Royal National Lifeboat Institution
ComReg	Irish Fish Producer's Organisation	Sea Fisheries Protection Authority
Córas Iompair Éireann (CIÉ)	Irish Hang Gliding and Paragliding Association	Sea Watch Foundation (UK)
Department of Culture, Heritage and the Gaeltacht	Irish Rail	Skerries Sailing Club
Department of Defence	Irish Sailing	Sustainable Energy Authority of Ireland (SEAI)
Department of Regional Development, Ports and Public Transport Division (Northern Ireland)	Uisce Éireann (Irish Water)	TETRA Ireland
Department of the Environment, Climate and Communications	Irish Whale and Dolphin Group (IWDG)	The Arts Council / An Chomhairle Ealaíon
Marine Survey Office of the Department of Transport	Joint Nature Conservation Committee (JNCC)	The Irish Tourist Industry Confederation
Department of Transport, Tourism and Sport	Joint Research Centre (European Commission) (JRC)	Loughs Agency
Drogheda Harbour	Local Bird Watch	Three (Ireland)
Drogheda Port	Louth County Council	Transport Infrastructure Ireland (TII)
Dublin Airport Authority (DAA)	Cetacean Strandings Investigation Programme (UK)	UK Cetacean Strandings Investigation Programme Investigation
Dunany Lobster and Crab (Seafood supplier)	Marine Institute	Viatel
Dundalk Port Company	Marine Protected Area Management and Monitoring	Vodafone
Dundalk Sub Aqua Club	Marine Survey Office	Warrenpoint Harbour Authority
Eastern and Midland Regional Assembly	Maritime Area Regulatory Authority (MARA)	Westmeath County Council – Westmeath National Roads Office

Organisations Consulted with as part of the EIAR Process		
Eir	Meath County Council	Weston Airport
Eircom	Meteor	

4.10 Consultation with Utilities and Public Bodies

In order to ensure the feasibility of the proposed infrastructure having regard to any relevant existing or proposed utilities or other infrastructure, the Applicant has met or liaised with utilities and public bodies. These meetings have informed the project design. The details of the key consultations held in this respect are set out in Table 4-8 below.

Table 4-8: Consultation with Utilities and Public Bodies.

Utility / Public Body	Key Matters Discussed	Dates of Consultation
Uisce Éireann	• Having ensured that there were no conflicts arising having regard to Irish Water infrastructure, the Applicant ultimately secured a Confirmation of Feasibility Letter from Uisce Éireann on 29 March 2023.	2019, 2021, 2022, 2023
ESB Networks	• ESB Networks have confirmed that while they do not issue letters of consent and are happy to have been informed about the Project.	2019, 2022
Iarnród Éireann (Irish Rail)	• Iarnród Éireann have advised that they consider the design of the Project to be acceptable. • It was noted that should the Project secure development consent, an application for a licence to pass under the railway line will need be made.	2019, 2020, 2024
Gas Networks Ireland	• Gas Networks Ireland have issued an email to the Applicant confirming that the design is in compliance with their requirements.	2019, 2022

4.11 Conclusions in Relation to Consultation

The prospective Applicant and the project team have consulted widely in the preparation of the planning application. Pre-application submissions and comments received by the Applicant in relation to the Project have been fully considered by the Applicant in the design of the Project and by RPS in the preparation of the EIAR and the planning pack.

The design of the Project and the contents of the application documentation reflect the advice given by ABP during the long pre-application consultation phase associated with the Project, which dates back to 2010. Pre-application consultation with Louth County Council and other Local Authorities has also informed the development of the Project. Having been consulted over many years, the directly affected landowners concerned have all provided their written consent to the project. The Applicant has also held extensive public consultation in relation to the Project, all of which has informed the ultimate proposal.

In addition, the Project has been discussed with a long list of prescribed bodies, all relevant utility providers and public bodies, all of whom have confirmed that they consider the design to be acceptable. Over 116 no. stakeholder entities have been consulted with as part of the EIAR Scoping of the Project and transboundary consultation with Northern Ireland, Great Britain and the Isle of Man. Every effort has been made to address all of the matters raised as a result of the consultation that has taken place and, where practicable, mitigation measures have been proposed to minimise the environmental impact of the Project.

5 THE PROJECT

5.1 Overview of the Project

The Project comprises an offshore wind farm with associated electrical infrastructure including an onshore and an offshore substation and associated underground and subsea cables. A schematic representation of the Project including the onshore and offshore elements is shown in Figure 5-1.

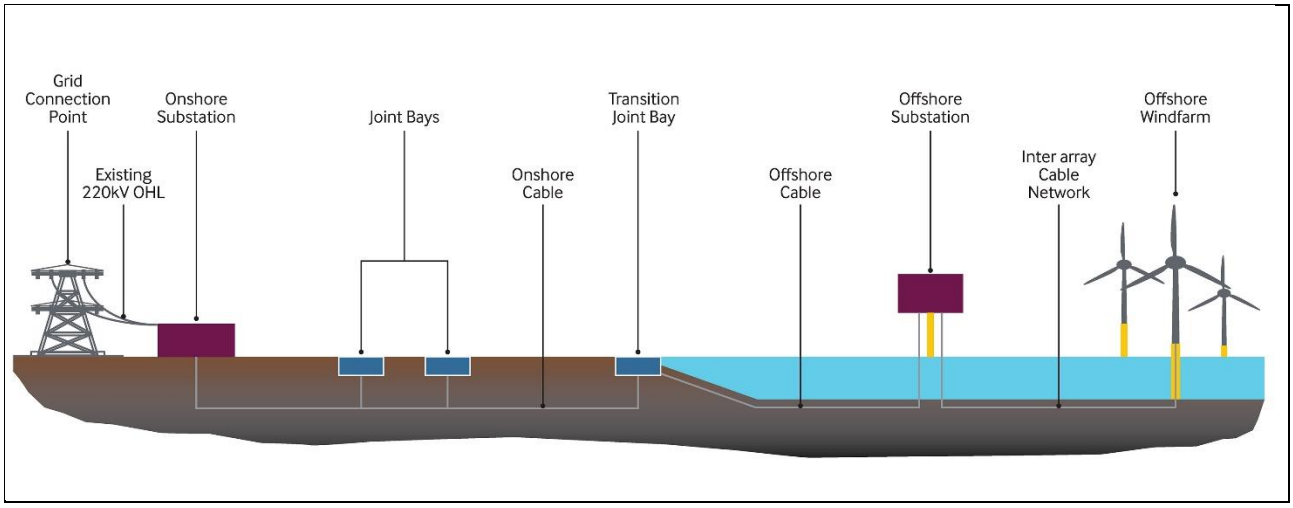


Figure 5-1: Schematic Representation of Key Components of the Project.

5.2 Site Location

Figure 5-2 illustrates the location of the Project. The Project specifically consists of:

- The offshore wind farm area which is where the offshore wind farm components will be located within the Irish Sea, to the east of Dundalk Bay and approximately 22 km east of Dundalk Town Centre. This area will include the offshore wind turbine generators and their associated foundations on the seabed, inter-array cables, the offshore substation in addition to a portion of the “export cable” (i.e. the cable which exports renewable energy generated from the offshore substation).
- The offshore cable corridor: This is where the offshore export cable will be largely located. The offshore cable extends from the offshore wind farm area to a landfall location south of Dunany Point.
- The onshore cable route which is proposed to be located underground primarily along existing public roads between the landfall location and the onshore substation location which is situated approximately 20.1 km to the east of that in the Townland of Stickillin to the east of Ardee in Co. Louth. It is proposed that the underground onshore cable and associated underground components (joint bays and link boxes) will be located within a trench of approximately 1 m in width.
- The onshore substation location which is an agricultural field where the proposed onshore substation including the connections to the existing 220 kV overhead electricity transmission system power line (National Grid) will be located.

5.2.1 Description of the Location of the Project

The offshore wind farm area concerns a broadly hexagon shaped area of approximately 27.7 km^2 and approximately 5.3 km west to east and 6.6 km north to south. The offshore wind farm area is positioned approximately 5 km south of the Cooley Peninsula in Co. Louth, 18 km east of Blackrock, 22 km east of Dundalk and 10 km north-east of Dunany Point. The closest offshore wind turbine is proposed to be located approximately 6 km from the closest shore on the Cooley Peninsula.

The offshore substation is proposed to be located in the south-west corner of the proposed offshore wind farm area. The offshore export cable is proposed to be located in an offshore cable corridor which is

approximately 0.6 – 4 km in width and runs in a south-westerly direction from the proposed offshore wind farm to the proposed landfall location situated c. 700 m south of Dunany Point (i.e. the landfall), a distance of 11 km in length.

In the interests of environmental protection, the proposed offshore wind farm area itself avoids all designated European Natura 2000 Sites off the coast of Co. Louth, notably, the Dundalk Bay Special Protected Area (SPA) and the North-west Irish Sea cSPA[4]. In addition, in terms of national designations, the Project entirely avoids the proposed Dundalk Natural Heritage Area (pNHA) and the extent to which the Project concerns the proposed Dunany Point NHA (pNHA) has been kept to an absolute minimum. Approximately 2 km of the offshore export cable will be constructed within the North-west Irish Sea SPA.

The proposed onshore infrastructure is located approximately halfway between Drogheda and Dundalk and to the west of the town of Ardee in Co. Louth. More specifically, it is located in the following Townlands in Co. Louth; Dunany, Mitchelstown, Port, Nicholastown (Electoral Division of Dysart in the Barony of Ferrard), Boycetown, Togher, Clonmore, Tullydonnell, Corstown (Electoral Division of Drumcar in the Barony of Ardee), Corstown (Electoral Division of Dunleer in the Barony of Ferrard), Drumcar, Mullincross, Charleville, Dromgoolestown, Richardstown (Electoral Division of Stabannan in the Barony of Ardee), Harristown and Stickillin.

The onshore cable route commences at the landfall south of Dunany Point and follows local roads heading south through the townlands of Dunany, Mitchelstown and Port before heading westwards on local roads through Nicholastown (Electoral Division of Dysart in the Barony of Ferrard), Boycetown, Togher and Clonmore. At Keenan's Cross, it continues westwards through Tullydonnell before angling northwards through Corstown (Electoral Division of Drumcar in the Barony of Ardee) and Corstown (Electoral Division of Dunleer in the Barony of Ferrard).

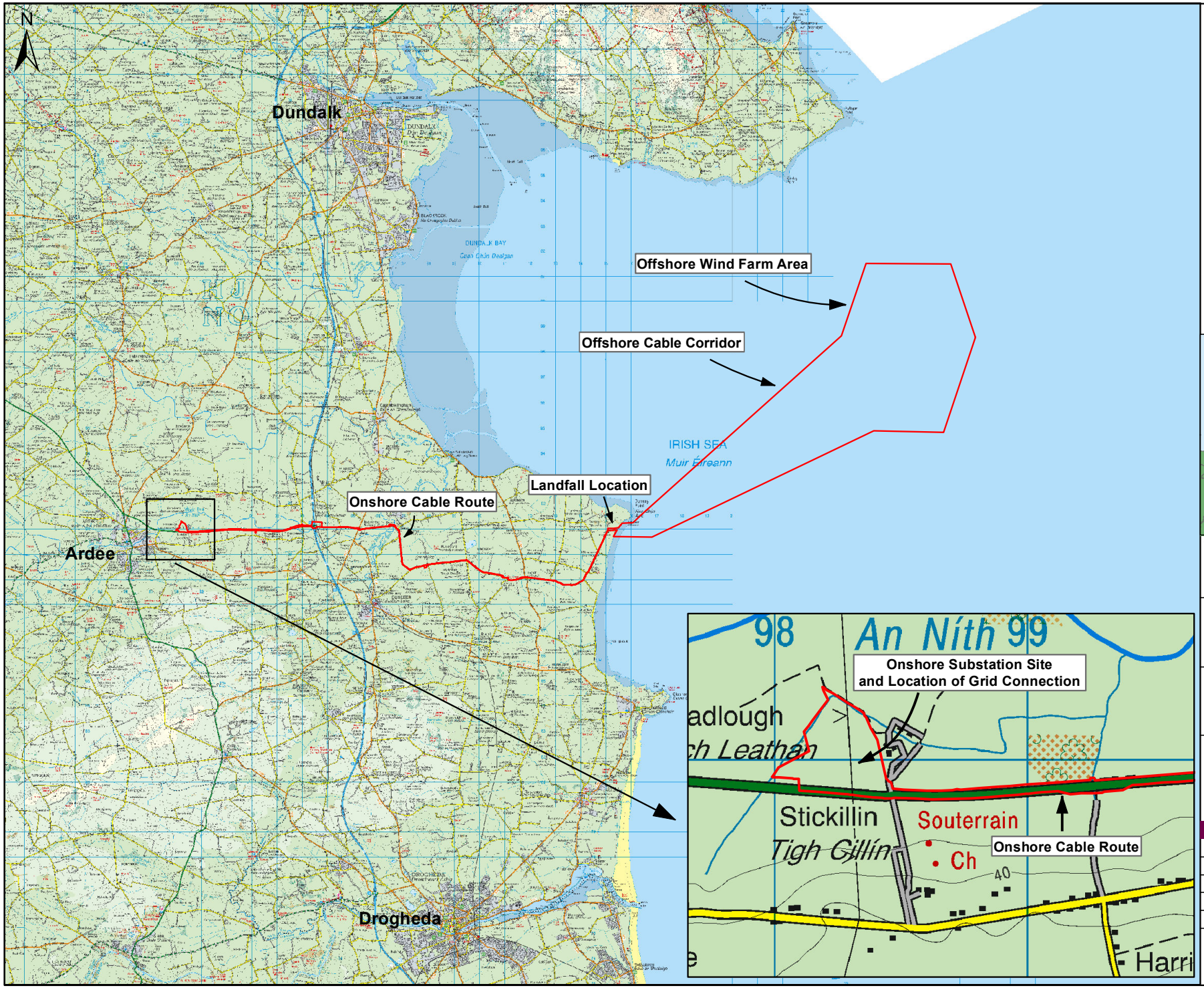
The onshore cable route crosses the River Dee at Drumcar Bridge and continues along local roads. Heading in a westerly direction, at Mullins Cross the onshore cable route crosses the R132, then the M1 and Dublin to Belfast Rail Line. It then follows the N33 and crosses the River Dee for a second time and then continues westwards to tie-in to the existing overhead line in the townland of Stickillin. The proposed 220 kV substation lands are located c. 3 km to the east of Ardee, c. 16 km south of Dundalk and c. 16 km north of Drogheda, Co. Louth. The entire length of the onshore cable route is approximately 20.1 km. The location of the onshore cable along existing public roadways has significant benefits in terms of reducing environmental impacts.

The onshore substation site is proposed to be located approximately 3 km east of the town of Ardee and on lands that are located directly north of the N33 national route. As illustrated in Plate 1, the substation site is currently in agricultural use and the lands are generally flat in grade. The substation site is already well screened form the N33 owing to the dense vegetation that is located along the boundary with the national road and the fact that the field itself is at a lower level than the national road.

The agricultural field, which is approximately 9.7 hectares in area, has an existing access from the N33 which services the field and neighbouring agricultural buildings. The existing 220 kV overhead line from the Louth substation (east of Dundalk) to Woodland substation (south of Dunshaughlin, Co. Meath) passes from north to south over the field. The area of land that the substation is proposed to occupy concerns an area of approximately 3.1 hectares to the east of the existing overhead line within the agricultural field.

The nearest residential dwelling to the substation site is located approximately 500 m to the south of the site as the crow flies. The substation lands allow for a loop-in connection to be made to the already existing Woodland – Louth 220 kV overhead transmission line which passes just east of the site. The 220 kV substation site will be securely fenced with a second property fence at 5 m beyond the compound fences.

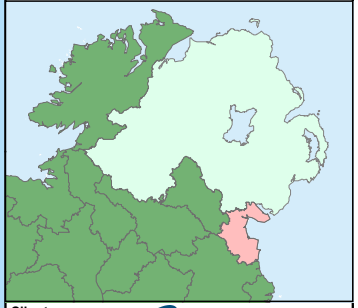
[4] The North-West Irish Sea candidate SPA (cSPA) was first notified to the pubic in July 2023, and conservation objectives were published in October 2023. The Minister proposes to classify this site as a SPA following statutory periods of consultation. The site will hereafter in this report be referred to as the "North-West Irish Sea SPA



Legend

Planning Application Boundary

Data Sources: OWL, OSi.



Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Figure 5-2:
Overview of Oriel Wind Farm Project

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Issue Details

Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3072F02
Approved By: CC	
Scale: 1:200,000 @ A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 12/01/2024	

Plate 1: Proposed Substation Site at Stickillin, east of Ardee in Co. Louth.

5.3 Description of the Project

A detailed description of the Project is contained in chapter 5: Project Description of the EIAR. The proposed development consists of the following principal elements:

A. Offshore renewable energy infrastructure in the outer maritime area located between approximately 6 km south of Cooley Point and approximately 10 km north-east of Dunany Point across an offshore wind farm area of approximately 27.7 km^2 and consisting of the following:

   i. 25 No. offshore wind turbines with a maximum tip height of 270 m above the Lowest Astronomical Tide (LAT) attached to the seabed by monopile foundations with associated scour protection and with a combined Maximum Export Capacity of 375 MW.

   ii. A network of 41 km of 66 kV subsea inter-array cables linking each of the proposed offshore wind turbines to the offshore substation including associated cable protection.

   iii. 1 No. offshore substation with a height of 48 m above LAT attached to the seabed by a monopile foundation with associated scour protection. This includes a prefabricated structure containing electrical equipment and ancillary equipment including a telecommunications mast.

B. A single 16 km long 220 kV subsea export cable and associated cable protection located within an offshore cable corridor of approximately 25 km^2 between the south-west corner of the offshore wind farm area and a landfall which is situated approximately 700 m south of Dunany Point.

C. An underground Transition Joint Bay (TJB) at the proposed landfall in the townland of Dunany. The TJB consists of a fully buried concrete chamber with a total area of 32.5 m^2, where the proposed offshore export cable will be connected to the underground onshore export cables.

D. Installation of underground onshore export cables, approximately 20.1 km in length, connecting the proposed TJB in the townland of Dunany to the proposed onshore substation in the townland of Stickillin. The cables will be laid in a standard trench of approximately 700 mm in width and 1425 mm in depth.

E. Installation of fibre optic, telecommunication and other associated cabling all carried in underground ducts within the proposed trench.

F. Installation of 2 No. additional fibre optic cable ducts within the underground cable trench of approximately 1500 mm in width, from the proposed onshore substation in the townland of Stickillin along the N33 for approximately 3 km and connection into a 110 kV double wooden poleset on the existing Drybridge-Louth 110kV overhead line in the townland of Richardstown, (Electoral Division of Stabannan).

G. Installation of the cables will require associated joint bays and link boxes, located at approximately 700 m intervals along the underground cable alignment. The cable installation will also require the

construction of temporary passing bays and the use of either Horizontal Directional Drilling (HDD) or open cut construction techniques for utility crossings of water, rail, gas and motorway.

H. A new onshore electricity substation adjacent to the proposed connection point in the townland of Stickillin. The onshore substation will comprise of the following main elements:

i. Compound 1 Onshore Transmission Connection comprising:

- 220 kV Gas Insulated Switchgear (GIS) equipment contained within a building of approximately 20 m x 60 m and a height of 17 m.
- 6 No. lightning protection poles of approximately 3 m in height located on the parapet of the GIS building.
- A lattice steel telecommunications mast of 36 m in height.
- 5 No. associated car parking spaces, an internal access road 5 m in width and a house transformer.

ii. Compound 2 Offshore Transmission System comprising:

- 220 kV Air Insulated Switchgear (AIS) equipment at an approximate height of 10 m, including a transformer bay, 2 No. harmonic filter bays, shunt reactor bay, 2 No. cable bays, 220 kV busbar, and ancillary control equipment.
- A control building of 34 m x 10 m and a height of 11 m with up to 6 No. lightning protection poles of approximately 3 m in height located on the parapet of the building.
- A statcom building of 14 m x 28 m and a height of 10 m with associated ancillary equipment.
- 12 No. lightning protection poles of approximately 20 m in height will be placed within the compound. It will include a lattice steel telecommunications mast of approximately 36 m in height, standby diesel generator and a house transformer.
- 4 No. associated car parking spaces and an internal access road 5 m in width.

iii. Entrance Compound providing access to Compound 1 and Compound 2 and including:

- A telecommunications building of 15 m x 4 m and a height of 4 m.
- A standby diesel generator and 1 no car parking space.

iv. Common Areas:

- All compounds will be bounded by a 2.6 m high green palisade security fence / gates.
- The existing entrance will be widened to 6 m in width.
- 1.4 m high property fence / gates will surround the site.
- All associated landscaping.
- All other associated site development works such as surface water infrastructure and attenuation tanks to facilitate development.

I. 2 No. line cable interface masts of 27 m in height will be constructed adjacent to the onshore substation. This will require an existing 220 kV tower (31 m in height) and associated infrastructure to be decommissioned.

J. A temporary construction compound adjacent to the onshore substation with a footprint of approximately 12,850 m^2 including welfare and storage areas. 3 No. additional temporary construction compounds located along the onshore cable route varying in footprint from 3,000 m^2 to 4,200 m^2 and 8 No. temporary HDD compounds (4 off road HDD's) varying in footprint from 100 m^2 to 4,500 m^2.

K. All associated and ancillary above and below ground development including works comprising or relating to construction works, roadworks, excavation (including HDD) and vegetation clearance.

Planning permission is sought for a period until the expiry of the Maritime Area Consent for the Project on 22 December 2067.

The proposed development is not likely to have significant effects on the environment of the United Kingdom of Great Britain and Northern Ireland and including the environment of the Crown Protectorate of the Isle of Man, which are parties to the Transboundary Convention (the United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context, done at Espoo in Finland on 25 February 1991).

A separate 'Dumping at Sea Permit' application will be made to the Environmental Protection Agency to regulate the dumping of any materials at sea.

5.3.1 Overview of Design Flexibility

The design of the Project is well advanced and the Applicant has made every effort to finalise details of the Project, insofar as possible. For reasons that are not in the control of the Applicant, including the constantly moving nature of the marine environment and ever-changing nature of offshore wind farm technology, there are some details of the design requiring finalisation, which cannot be completed in advance of submission of the application. Therefore, the Applicant submitted an application for an opinion under Section 287B of the Act, as amended by the Planning and Development, Maritime and Valuation (Amendment) Act 2022, for consideration of the design flexibility required for the Project as set out in section 4.2.2 of this report.

In accordance with Section 287B (2) of the Act, the Board formed an opinion in relation to the degree of design flexibility that the Project required on 25 January 2024. ABP determined that due to the specific circumstances of the development, it is satisfied that the proposed application can be made and decided before certain details of the application are confirmed. The information and the associated details/circumstances that were considered by the ABP are set out below. A description of details or groups of details where design flexibility was sought are provided in the sub sections below under the sub-heading 'Design Flexibility' together with details on the opinion from An Bord Pleanála.

5.3.1.1 Final Exact Location of each offshore wind turbine and the offshore substation

Detailed geophysical studies have been completed for each proposed foundation location.

A future offshore geotechnical survey (under Foreshore Licence FS007383 issued 17 May 2023) is planned. This will drill a minimum of one borehole at each proposed foundation location inform the final detailed design of each foundation. The survey has been consented under Foreshore Licence.

Variable ground conditions across the foundation sites have been identified. Ground conditions such as boulders would result in the requirement to move the foundation. While a proposed layout for the offshore wind turbines has been included as part of the planning drawings, a 50 m radius of lateral deviation in the final location of each offshore wind turbine and the offshore substation is required and has been assessed in the EIAR. The proposed radius of lateral deviation is sufficient to identify alternative, feasible locations. Therefore, the exact location of each offshore wind turbine and the offshore substation will be confirmed after the proposed application has been made and decided.

5.3.1.2 The final height of offshore infrastructure

Owing to the fact that variable ground conditions exist across the foundation sites, it is not possible to confirm the exact height of the offshore infrastructure until the proposed application has been made and decided. More specifically, the wind turbine hub height will vary within the range 145-152 metres above Lowest Astronomical Tide (maLAT) across the wind farm site due to the specific height of each foundation being a variable factor. A maximum tip height of 270 maLAT (152 maLAT + 118 m) and a minimum tip height of 27 maLAT (145 maLAT – 118 m) is presented and assessed in the EIAR. Notwithstanding this, a preferred wind turbine model of 15 MW has been selected and the wind turbine rotor diameter is fixed at 236m (i.e. 118 m radius).

The exact final height of offshore infrastructure will be confirmed following detailed geotechnical investigations and analysis of ground conditions.

5.3.1.3 The final route and length of the offshore export cable and offshore inter-array cables

A preferred route for each inter-array cable and export cable has been identified following detailed geophysical and geotechnical site investigations. Arising from the fact that the final exact routes and level of burial and cable protection are subject to change due to potential unexpected ground conditions and obstructions, design flexibility is required in relation to the final route and length of these subsea cables.

The maximum length of export cable from the offshore substation to the landfall is 16km and the maximum length of the inter-array cables within the wind farm area is 41km. The maximum potential lengths of inter-array and export cable and the maximum portion of the cable requiring protection by rock or concrete mattress have been assessed in the EIAR and the NIS.

Cables will be buried to a depth of 3m where possible. If burial is not feasible due to hard seabed conditions the cable will be laid on the surface of the seabed and protected with rock placement or concrete mattresses. The maximum portion of the cable requiring surface protection is 50%.

In terms of the subsea cables, ABP decided not to accept the request for design flexibility for the extent and nature of the protection of subsea cables associated with the proposed development as the Board considered that this element of the proposed development relates to normal construction practices that are intrinsic to the installation for the development.

5.3.1.4 The location and layout of the landfall transition joint bay

A transition joint bay, which is a buried chamber, is required to connect the single offshore export cable to three onshore cables. Two options for the location of the Transition Joint Bay (TJB) are presented in the Application. The two options are in close proximity and approximately 40 m from each other. More specifically:

- Option 1 is close to the beach at Dunany above the high-water mark; and
- Option 2 is in an agricultural field adjacent to the beach.

Flexibility was sought in relation to the location of the TJB owing to the fact that the cable needs to be kept at a certain temperature in order for it to perform effectively. Therefore, the final location of the TJB will be confirmed on examination of the electrical and thermal properties of the selected offshore export cable and the ground conditions at the landfall. As a result of this, the exact location and location of the TJB will be confirmed after the proposed application has been made and decided.

5.3.1.5 The final design for the type and siting of outdoor equipment within the proposed onshore substation

An onshore substation design is presented and assessed in the EIAR. The onshore substation design adheres to the requirements of the current EirGrid functional specification and utilises current best available technology. Detailed parameters for the buildings, two new line cable interface masts (pylons to support the existing overhead line) and outdoor equipment are presented in the application. However, owing to technological advances, amendments to the final design for the type and siting of outdoor equipment within the onshore substation may be required. Therefore, the final design for the type and siting of outdoor equipment within the proposed onshore substation will be confirmed after the proposed application has been made and decided.

5.3.2 Description of the proposed offshore infrastructure

5.3.2.1 Offshore Wind Turbines

Each wind turbine generator (WTG) will be a three-bladed, horizontal rotor axis type, designed for offshore conditions. The blades will be connected to a central hub, forming a rotor which turns a shaft connected to a generator. The generator is part of the drive train, which will be located within a containing structure, known as the nacelle, situated adjacent to the rotor hub. Together it is referred to as the rotor nacelle assembly (RNA). A hoist platform is mounted on the roof of the nacelle to allow for emergency access and egress.

The nacelle will be mounted on top of a tubular steel tower structure affixed to the foundation which forms the connection to the subsea soil. The nacelle will be able to rotate or 'yaw' on the vertical axis in order to face the incoming wind direction. It is proposed that the colour of the components will be light grey (RAL 7035 or 9010) apart from the hoist platform, navigation markings and the foundation. An illustration of this design is presented in Figure 5-3.

The project design parameters for the WTGs are provided in Table 5-1. The parameters are defined relative to LAT. All wind turbines will be marked for aviation and navigation purposes.

Table 5-1: Project design parameters for the WTGs.

Offshore Wind Turbine Parameters	Values
Number of WTG	25 No.
Minimum height of lowest blade tip above LAT	27 m
Maximum blade tip height above LAT	270 m
Hub height above LAT[5]	145-152 m
Rotor diameter	236 m

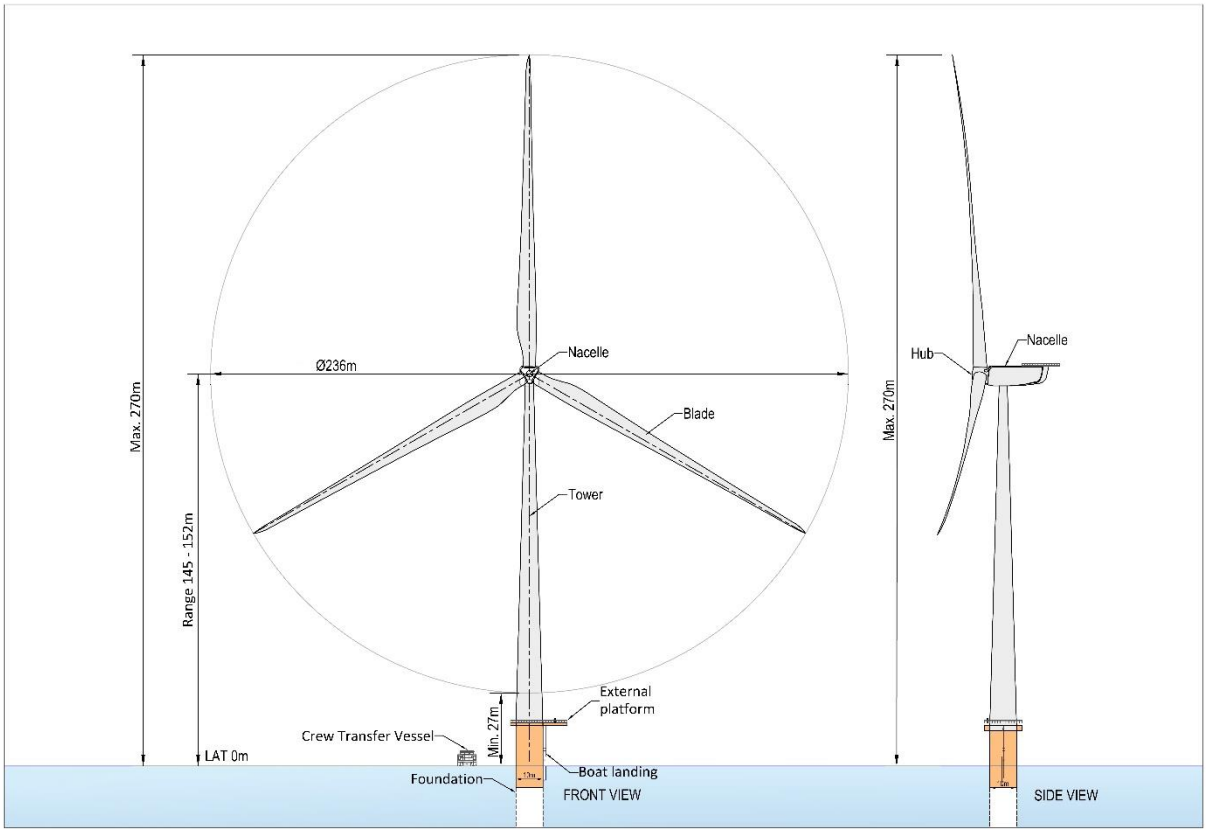


Figure 5-3: Illustration of composition of each offshore WTG.

[5] Wind turbine hub height will vary within the range stated across the offshore wind farm area. The design and height of each wind turbine foundation is specific to the subsoil geology and geotechnical properties at each wind turbine location. The foundation height will affect the hub height of each wind turbine.

5.3.2.2 Offshore Substation

Situated in the south-west corner of the wind farm area, the offshore substation will transform the electricity generated by the WTGs from 66 kV to 220 kV before transmission to shore via the offshore export cables. The offshore substation will comprise a prefabricated structure mounted on a fixed foundation similar to the WTGs. The height of the main substation structure will extend to approximately 40 m above LAT. The key design parameters of the above-water portions of the offshore substation (i.e. the topside of the substation) are set out in Table 5-2.

Table 5-2: Project design parameters for the offshore substation.

Element of Above-Water Element of Offshore Substation	Design parameter
Height of main structure (above LAT)	40 m
Height of lightning protection (above LAT)	48 m
Height of crane (above LAT)	48 m
Topside length	40 m
Topside width	30 m
Topside weight	3,000 t

To limit the visibility against the sky, it is proposed that the offshore substation topside structure will be coated in a light grey colour. It will house auxiliary equipment and facilities for operating, maintaining, and controlling the substation and will perform a range of functions including transforming the generated electricity to 220 kV High Voltage Alternating Current (HVAC) and export the power through a single cable consisting of three internal conductor cores. The offshore substation will not be manned but once functional, it will be subject to periodic operational and maintenance visits.

5.3.2.3 Description of Offshore Export Cable

The offshore cable corridor is approximately 11 km in length and covers an area of approximately 25 km^2. The corridor is approximately 4 km at its widest point, south-west of the offshore wind farm area, and narrows to approximately 0.6 km at its narrowest point, just before landfall south of Dunany Point. An offshore export cable will transmit electricity from the offshore substation to the landfall point where this cable will connect with the onshore transmission infrastructure.

Similar to the inter-array cables, the offshore export cable will be buried below the seabed where feasible to a minimum burial depth of 0.5 m and a maximum burial depth of 3 m or laid on the seabed and protected with materials such as concrete / steel mattresses and / or rock projection as shown in Figure 5-4. It is anticipated that up to 50% of the offshore export cable may require cable protection.

5.3.2.4 Description of inter-array cable

The offshore inter-array cables will connect the WTGs into ‘strings’ and each string will be connected to the offshore substation. Inter-array cables will be buried wherever possible to a minimum burial depth of 0.5 m and a maximum burial depth of up to 3 m, as determined by seabed conditions.

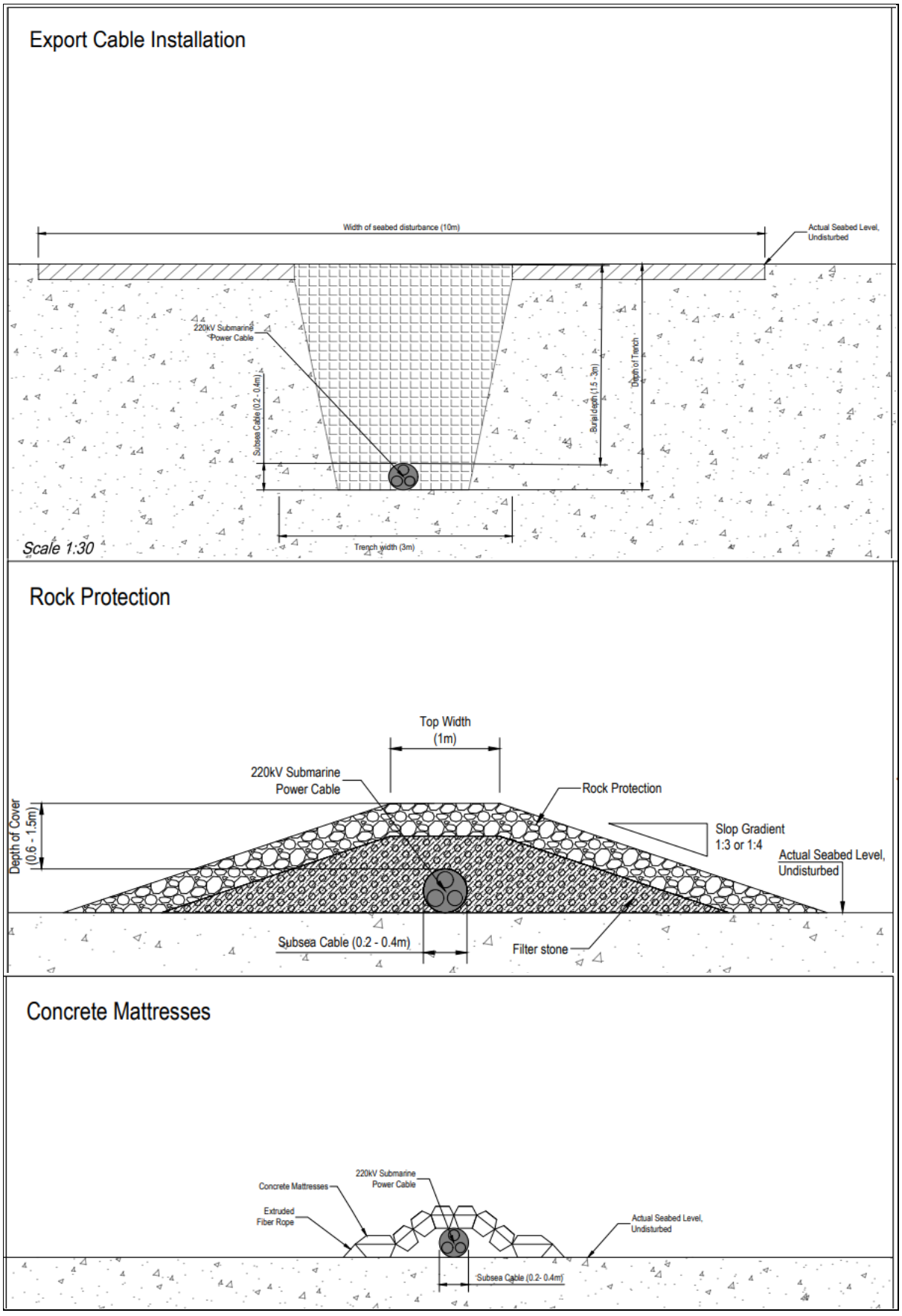


Figure 5-4: Offshore Cable Arrangements (not to scale).

5.3.3 Description of the proposed onshore infrastructure

The onshore infrastructure concerns the following three primary elements:

i. Underground infrastructure at the landfall point (i.e. the location of the landfall);

ii. An onshore underground grid connection between the landfall point and the 220 kV substation; and

iii. A 220 kV onshore substation and associated grid connection to the existing 220 kV overhead line.

5.3.3.1 Description of Landfall Location

Situated approximately 700 m south of Dunany Point, a Transition Joint Bay (TJB) serves the purpose of connecting the offshore subsea cable to the onshore cable at the landfall location. The TJB is a fully buried concrete chamber which is located as close to the High Water Mark as is feasible in order to minimise the length of offshore export cable on land. The TJB will concern an area of approximately 32.5 m^2 and it will be constructed with concrete walls and a concrete floor and a link box will be accessible in a concrete well via a manhole to enable periodic testing. A communication chamber will also be provided adjacent to the TJB in order to allow termination and testing access for the communications cables.

After cable installation, the TJB will be covered by soil / sand or similar and the original surface will be reinstated. The offshore cable will be brought into the TJB in a buried section. Further details in relation to the landfall location are contained in chapter 5: Project Description of the EIAR (volume 2A).

5.3.3.2 Description of Onshore Underground Grid Connection Cable

The onshore cable route of approximately 20.1 km in length is required in order to connect the offshore cable at the TJB to the 220 kV substation. This 220 kV circuit has been designed and will be installed in compliance with the published Functional Specification of the Transmission System Operator (TSO), EirGrid. The proposed onshore cable route will pass under both the M1 motorway and the Dublin to Belfast railway line. The use of HDD methods is proposed for the crossing of larger watercourses and other obstacles as it allows installation of the onshore cable underneath those watercourses / obstacles, thereby avoiding having a direct impact on these features. The onshore cable will also transverse a number of drains and ditches. The open trench method will be used for crossings of drains and ditches. The full list of the eight proposed underground cable crossings and proposed crossing methods are detailed in Table 5-3.

Table 5-3: Proposed Underground Cable Crossings methods.

No.	Underground Cable Crossing	Proposed Method
1	River Dee at Richardstown, N33	HDD
2	High Pressure Gas Main at Richardstown N33	Open Trench
3	M1 Motorway and Dublin Belfast Rail Line at Charleville	HDD
4	River Dee at Drumcar	HDD
5	High Pressure Gas Main at Drumcar	Open Trench
6	Port Stream tributary at Clonmore	Open Trench
7	Port Stream at Togher	HDD
8	Salterstown Stream at Salterstown	HDD

The proposed underground cable route will comprise of three buried High Voltage Alternating Current (HVAC) power cables and two associated communications cables. The communications cables will consist of multicore fibre-optic cables that are dedicated to the control of and communication with the offshore substation and wind turbines.

Each power cable will have cross-linked polyethylene insulated electrical conductors, surrounded by a copper screen typically surrounded by High Density Polyethylene, with a diameter of approximately 10 cm. The operating voltage of these cables will be 220 kV. The three cables will be laid in trefoil arrangement except for crossings where flat arrangement may be required. The insulated cables will be enclosed in protective plastic ducts, which are then protected by being buried, typically at a depth of 1.2 m, with a protective concrete surround and hardcore backfill up to the reinstated surface. These ducts along with two communication cables as typically arranged within a single trench are illustrated in Figure 5-5.

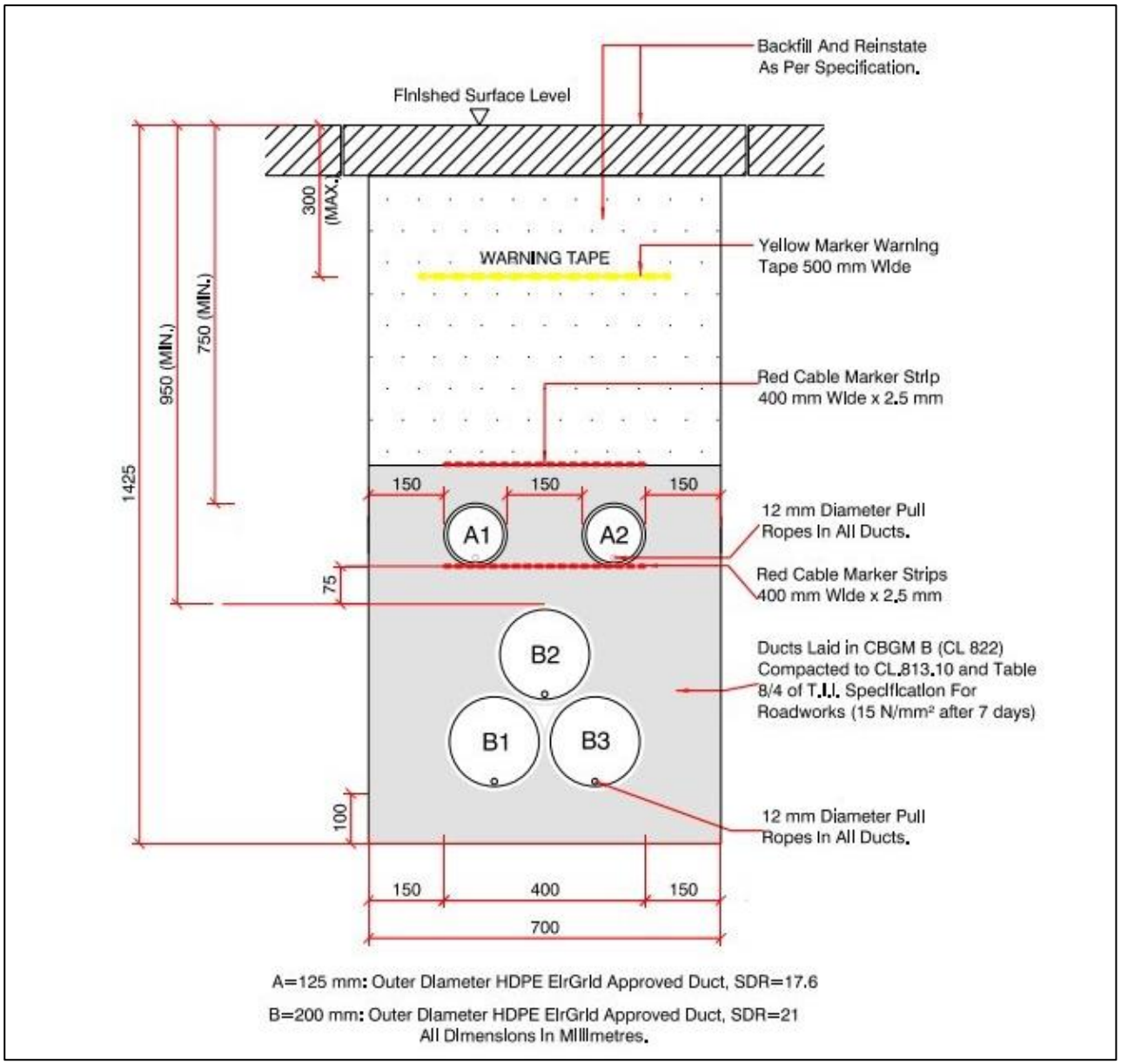


Figure 5-5: Typical Onshore Cable Arrangement Section (not to scale).

There will also be a need for 29 no. buried cable joint bays along the onshore element of the cable. This is due to the fact that the cables are manufactured in lengths of approximately 700 m, and during installation, each cable length must be jointed to the next cable at intervals of approximately 700 m, in a cable joint bay (typically 10 m x 2.5 m x 2 m).

The cable joint bays are buried and not visible and the majority are proposed to be located under the public road. Those that are proposed to be located in agricultural land are proposed on the edge of fields and will be available for agricultural use once they have been installed. At the cable joint bay locations, the copper cable screens are also jointed in link box chambers, which have a surface access pit lid. Where feasible, passing bays are proposed adjacent to joint bays to enable through traffic during the construction and cable installation at the joint bays.

Link boxes and communication chambers will also be required along the onshore cable route. These are smaller pits, compared to joint bays, which house connections between the cable shielding, joints for fibre optic cables and other auxiliary equipment. Land above the link boxes and communication chambers will also be reinstated, however, they may need manhole covers for access during the operational phase.

5.3.3.3 Description of 220 kV Onshore Substation and Grid Connection to Existing Overhead Line

The proposed onshore substation will contain equipment required to filter, monitor and control electricity received from the offshore wind farm to the requirements for grid connection to the electricity grid. The onshore substation equipment will be maintained by the Transmission Asset Owner (ESB Networks) and operated by the Transmission System Operator (EirGrid). The substation will connect to the existing Woodland to Louth 220 kV overhead line which traverses the substation site. The proposed substation site will comprise of the following main elements:

Compound 1 (GIS) (Onshore Transmission Connection): This compound will contain the 220 kV Gas Insulated Switchgear (GIS) infrastructure within a building with a gross floor area of approximately 2,155 m^2 and a height of approximately 17 m. The entire compound has an area of approximately 4,600 m^2. Associated development within the compound will include a lattice steel telecommunication mast of approximately 36 m in height and six lightning finials of approximately 3 m in height located on the parapet of the GIS building. There will be 5 No. car parking spaces located within this compound. An access road 5 m in width will loop around the building and connect with the entrance compound. An MV/LV house transformer will be located near the main entrance to the compound. The compound will be bounded by a secure palisade fence, 2.6 m in height.

Compound 2 (AIS) (Offshore Transmission System): This compound will contain a control building with up to six lightning finials of approximately 3 m in height located on the parapet of the building. The compound will also contain 220 kV Air Insulated Switchgear (AIS) infrastructure for the TSO's control in accordance with the grid connection offer and will include equipment for dynamic and/or static reactive power compensation, harmonic filtering and switching. In summary, the AIS compound will contain the following type of equipment:

- 1 x 220 kV AIS busbar;
- 1 x 220 kV statcom bay including statcom building;
- 1 x 220 kV transformer bay;
- 2 x 220 kV harmonic filter bays;
- 1 x 220 kV shunt reactor bay;
- 2 x 220 kV cable bays;
- 1 x control building; and
- 1 x MV/LV house transformer.

The compound has an area of approximately 17,200 m^2. 12 No. lightning monopoles of approximately 20 m in height will be placed within the compound for lightning protection and will include a lattice steel telecommunication mast of approximately 36 m in height. There will be 4 No. car parking spaces located within this compound. The compound will be bounded by a green palisade fence 2.6 m in height. An access road of 5 m in width will run alongside the eastern and northern palisade fences and connect with the entrance compound.

Entrance Compound: The entrance is shared by compound 1 and compound 2 with an area of approximately 600 m^2. The compound will contain a telecommunications building, which will be 15 m x 4 m and a height of 4 m. It will also contain a backup bunded diesel generator. There will be 1 No. car parking space located within this compound. The area will be bounded by a secure palisade fence 2.6 m in height.

Works below ground level: There will be 2 No. 220 kV underground network circuits from the GIS building to the new line cable interface mast (LCIMs). There will also be 1 No. 220 kV underground circuit to Compound 2 (AIS). The depths of excavations for construction of the onshore substation infrastructure will not exceed 2 m below ground level (bgl). A new underground drainage network will be installed as part of works. The depths of excavation for construction of pipework, inspection chambers and other related underground elements will not exceed 3 m below the proposed finished floor level or 2 m below the existing ground level.

Line Cable Interface Masts (LCIM): Two LCIMs will be constructed in the agricultural field adjacent to the onshore substation. An existing 220 kV ESB tower (approximately 31 m in height) will be decommissioned to allow for the construction of the two new LCIMs. The LCIMs will be approximately 27 m in height to facilitate

the connection of the overhead lines to underground cables that will run from the towers into a termination point in the GIS building in Compound 1. This will facilitate the removal of a section of existing OHL (approximately 50 m).

Ancillary Elements and Landscaping: It is proposed that the substation (containing the Compound 1, Compound 2 and an entrance compound) and palisade fence are bounded within a post and rail property fence that is 1.4 m in height. There is planting of native trees proposed along the northern boundary of Compound 2. A single main entrance to these areas will utilise the existing access route off the N33 national road. Existing vegetation on either side of the entrance will be trimmed back to achieve the required sightlines.

The layout of the proposed substation associated with the project is shown in Figure 5-6.

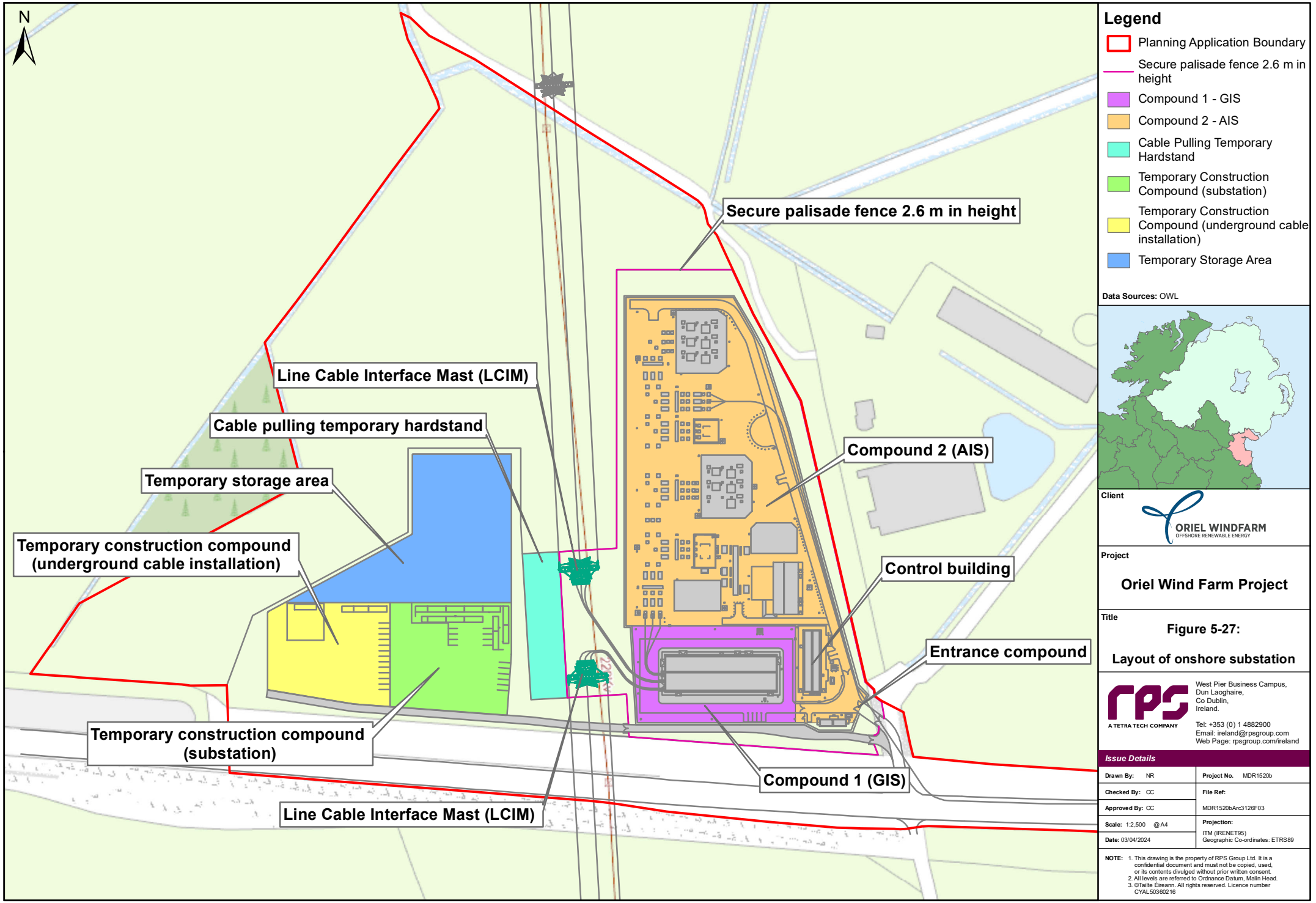
5.3.3.4 Description of Temporary Construction Compounds

It is proposed that 7 no. temporary construction compounds will be required to support the construction of the onshore cable and onshore substation. It is proposed that these temporary compounds would operate as a base for the onshore construction works and would house the offices, welfare facilities, and stores, as well as acting as a staging post and secure storage for onshore equipment and component deliveries. The sites identified will require hard standing suitable for the temporary placement of site facilities (such as offices, briefing rooms, catering facilities, storage etc., typically housed in port-a-cabins) and to allow plant and materials to be stored safely and securely.

Post-construction of the relevant works it is proposed that the construction compounds will be removed and the sites restored to their original condition. Information regarding the proposed location and duration of these temporary construction compounds is set out in Table 5-4.

Table 5-4: Location of Temporary Construction Compounds and Proposed Activities.

Location	Proposed activities	Proposed duration
Site of onshore substation at Stickillen	Storage and offices	27 months
East and west of River Dee at Richardstown	HDD Compounds	3 months
East and west of the M1/Railway	Storage and HDD compounds	HDD: 3 months Storage compound: 18 months
River Dee at Drumcar	HDD Compounds	3 months
Adjacent to JB17	Storage	18 months
Port Stream at Togher	HDD Compounds	1 month
Dunany; Landfall	Storage	18 months



Legend

- Planning Application Boundary
- Secure palisade fence 2.6 m in height
- Compound 1 - GIS
- Compound 2 - AIS
- Cable Pulling Temporary Hardstand
- Temporary Construction Compound (substation)
- Temporary Construction Compound (underground cable installation)
- Temporary Storage Area

Data Sources: OWL

Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

Figure 5-27:

Layout of onshore substation

rps
A TETRA TECH COMPANY

West Pier Business Campus,
Dun Laoghaire,
Co Dublin,
Ireland.

Tel: +353 (0) 1 4882900
Email: ireland@rpsgroup.com
Web Page: rpsgroup.com/ireland

Issue Details

Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3126F03
Approved By: CC	
Scale: 1:2,500 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 03/04/2024	

5.3.3.5 Temporary Traffic Passing Bays

It is proposed that at 16 no. locations along the onshore cable route, temporary traffic passing bays, each occupying an area an area of approximately 60 m x 10 m including storage areas for topsoil, materials and equipment and a temporary works area. These will be installed adjacent to cable joint bays to enable through traffic during the construction and cable installation at the joint bays. A typical arrangement for the Passing Bay is shown in Figure 5-7.

The construction and removal of the temporary passing bays will require the removal of vegetation to a licensed facility. Measures to protect biodiversity will be implemented as outlined in chapter 19: Onshore Biodiversity of the EIAR in addition to the erection of temporary stockproof fencing and the excavation of topsoil and store for reinstatement. Following the laying of cable, the passing bay will be reinstated with the excavated soil, the temporary stockproof fencing will be removed any vegetation removed will be replanted.

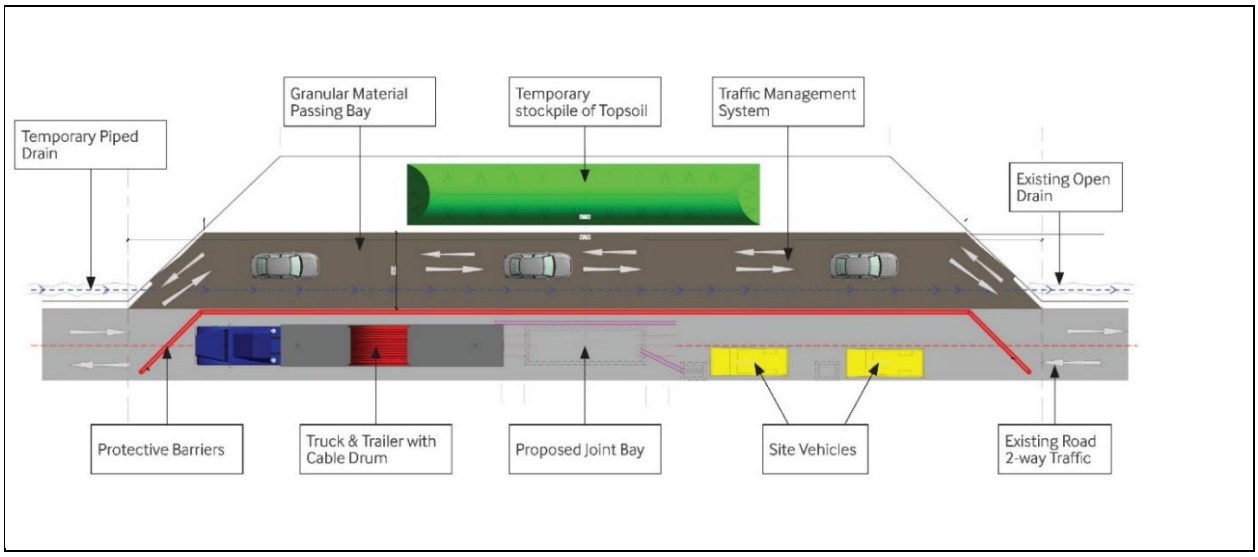


Figure 5-7: Typical Passing Bay.

5.4 Construction Methodology

The measures included in the Project include a number of management plans, which the Applicant is committed to implementing. These management plans are considered standard industry practice for offshore wind development and will be further developed prior to construction. The plans are listed below and are included in volume 2B of the EIAR. Final management plans will be submitted for approval to the relevant authority or other relevant stakeholders prior to construction.

1. Construction Environmental Management Plan;
2. Environmental Management Plan (including Marine Pollution Contingency Plan);
3. Marine Invasive Non-Native Species Management Plan;
4. Marine Megafauna Mitigation Plan;
5. Marine Megafauna: Vessel Code of Conduct;
6. Fisheries Management and Mitigation Strategy;
7. Emergency Response Co-operation Plan;
8. Lighting and Marking Plan;
9. Construction Traffic Management Plan; and
10. Marine Archaeological Management Plan.

5.4.1 Construction and Environmental Management Plan

The construction works required to realise the Project will be undertaken in compliance with a Construction and Environmental Management Plan (CEMP) which includes mitigation measures brought forward from the environmental assessments undertaken during the preparation of the EIAR and the NIS, such as the need to agree construction management plans, demolition plans, waste management plans, etc. The CEMP provides the environmental management framework for the appointed main contractor (and sub-contractors), and it will incorporate the requirements outlined by stakeholders during statutory consultations and the mitigating principles to ensure that the work is carried out with minimal impact on the environment. The implementation of the requirements of the CEMP will ensure that the works are carried out having cognisance of all statutory requirements. The proposed CEMP is presented in appendix 5-1 of the EIAR.

As with all road works, traffic management procedures will be required when installing the cable within the public road. Access for through traffic will be maintained along all roads through the installation of the passing bays. Advisory diversions avoiding the active works will be signed. Local access to properties will be maintained by the contractor at all times. This will be completed with the use of temporary metal cover plates for sections of open trench. For the regional roads to the east of the M1, one carriageway may be closed with use of the other carriageway restricted and controlled by temporary traffic lights or a “stop and go” traffic management system for the duration of the works. Traffic management and corresponding works will be carried out with the agreement of Louth County Council. The proposed Construction Traffic Management Plan (CTMP) is presented in appendix 5-9 of the accompanying EIAR.

5.4.2 Construction Programme

The proposed construction programme is presented in chapter 5: Project Description of the EIAR. The proposed phasing of construction works may be subject to adjustment as a result of external influences such as avoidance activity within certain periods close to sensitive habitats or severe weather events. A 33 month programme is proposed. This includes 27 months for construction of the onshore infrastructure and 15 months for construction of the offshore infrastructure.

The construction (and decommissioning) of the Project will require approximately 140 Full Time Equivalent (FTE) jobs to construct the onshore infrastructure and approximately 100 FTE jobs for the offshore infrastructure. A percentage of these jobs will require a particular level of specialist expertise. The proposed hours of construction are as follows:

- Monday to Saturday (inclusive) – 8:00am to 6:00pm; and
- Sunday and Bank Holidays – no operations and no associated lighting other than that required for security or safety.

Specific activities such as large concrete pours or delivery of large equipment (e.g. transformers) which require specific road control may occur outside these hours. Louth County Council and any affected local stakeholders will be informed prior to these activities taking place.

5.5 Operational and Maintenance Phase

The design life of the Project is 40 no. years. Operational and maintenance activities will be planned, controlled and monitored from an onshore operations and maintenance (O&M) base located at an existing harbour in Co. Louth or Co. Down. Three harbours (Kilkeel, Warrenpoint and Greenore) have suitable facilities and are approximately 1 hour sailing time from the offshore wind farm area. The operational and maintenance phase of the Project will create 30 no. jobs. The number of persons based at the O&M base will fluctuate depending on the maintenance schedule but is expected to be between 10 and 30 persons. Further details in relation to the Operational and Maintenance Phase are contained in chapter 5: Project Description of the EIAR.

5.6 Decommissioning Phase

At the end of the operational lifetime of the Project, it is anticipated that all structures above the seabed or ground level will be completely removed. Decommissioning will be carried out in accordance with a Rehabilitation Schedule supported by a decommissioning bond which will be agreed with the Maritime Area Regulatory Authority (MARA) prior to construction commencing. It is proposed that preparation of a

decommissioning programme will commence on completion of construction of the Project and be reviewed on an annual basis (to include any updates). Further details in relation to the Decommissioning Phase are contained in chapter 5: Project Description of the EIAR.

5.7 Relevant Planning History

This discussion of planning history is not intended to be exhaustive, but rather is intended to be relevant in terms of considering the Project having regard to principles of proper planning and sustainable development. The planning history review has identified a very limited number of planning applications or permissions within or very close to the proposed site boundary. This is indicative of the rural landscape traversed by the cable and the location of the proposed substation. Most of these planning permissions identified do not impact on the construction or operation of the Project.

In relation to the red line boundary of the Project and lands directly adjoining that red line boundary, RPS undertook a desktop planning history review of Louth County Council's (LCC) online planning search database and also reviewed the ABP website, over the 5 year period from 8 March 2019 until 8 March 2024. Any enforcement or Section 5 determinations were beyond the scope of this database review. The most relevant planning history concerning proposals which are either completed, under construction or permitted and yet to commence works are listed below. Appendix B illustrates the approximate location of relevant applications that are located either within the entirety of the red line boundary or adjoining red line boundary of the project.

5.7.1 Planning History within or adjacent to the Red Line Site Boundary

Table 5-5 lists the relevant planning history that concerns either LCC or ABP partially or wholly within the entirety of the red line site boundary or immediately adjacent to the red line boundary within the past five years and the below sub-section sets out further details in relation to each application. A five-year time period was reviewed as the typical duration of a standard planning application is five years, therefore, proposed developments that concern the period before that timeframe are likely to either be constructed or the permission is now expired.

Table 5-5: Relevant Planning History within the Entirety of the Red Line Site Boundary.

LCC Reg. Ref. No.	Summary of Development	Status at time of writing
23/60325	Permission for works associated with the proposed uprate of the existing Louth – Woodland 220 kV overhead powerline (OHL) between the existing Louth 220 kV substation in the townland of Monavallet, Co. Louth and the existing Woodland 220 kV substation in the townland of Woodland, Co. Meath.	Permission granted by LCC 20/11/2023
22/27	Permission for the construction of a road underpass for the movement of dairy cattle and ancillary works (i.e. drainage tanks and drainage, approach roads each side of underpass and minor revisions to roadside boundaries all for agricultural purposes only) along with permission for the construction of 3 no. calf sheds with ancillary concrete yard areas.	Permission granted by LCC 07/11/2022
23/399	Permission for the change of use of part of the ground floor from residential to restaurant use. A new rear single storey flat roof extension. New window openings and reconfiguration of existing openings to front, rear and side elevations. New opening for kitchen extracts. New enclosed bin store. Replace existing metal roof with new metal roof. New illuminated advertising to existing building and stand-alone illuminated advertising to perimeter of site. Demolish and rebuild unsafe existing store to front. New outdoor seating area associated with change of use within existing front garden. New pedestrian access path connecting the new outdoor seating area with the parking area to the rear. New parking layout including electrical vehicle charging spaces and bicycle parking. Closing up of existing vehicle entrance and formation of new vehicle entrance. All associated landscaping, drainage, ancillary site works and services.	Further Information requested on 26/10/2023
21/417 ABP-310692-21	Permission for construction of an 18 metre high free standing communications structure with its associated antennae, communication dishes, ground equipment and all associated site development works	Permisison granted by ABP 02/11/2021

5.7.1.1 Uprate of the 220kV Overhead Powerline from the Townland of Monavallet, Co. Louth to the Townland of Woodland, Co. Meath – LCC Reg. Ref. 23/60325

EirGrid have secured permission from LCC and Meath County Council (MCC) (LCC Reg. Ref. 23/60325 and MCC Reg. Ref. 23/60296) for the uprate of the existing 220kV overhead powerline, that runs from the Louth 220 kV substation in the Townland of Monavallet, Co. Louth, to the Woodland 220 kV substation, in the Townland of Woodland, Co. Meath. The existing overhead line traverses the site boundary in a north-south direction at the location of the proposed onshore substation. Existing mast no. 44 is located at the southern portion of the substation site and existing mast no. 43 is located to the north of the proposed substation site, just outside the red line site boundary.

The permitted development includes for the foundation strengthening at mast no. 42 and 43 and no foundation strengthening at mast no. 44. The construction of the proposed uprate works to mast nos. 42, 43 and 44 concerns a portion of lands within the onshore substation site, however, the Applicant will consult closely with EirGird in relation to the timing of construction programmes. As outlined in the EIAR, there is no potential for significant cumulative effects with the Project.

Once the uprate works have been completed, this permitted development will increase the transmission grid network capacity between the existing Louth and Woodland 220 kV busbars and will facilitate power flows between Ireland and Northern Ireland and integrate renewable energy generation off the east coast.

5.7.1.2 Road Underpass – LCC Reg. Ref. 22/27

LCC Reg. Ref. 22/27 is a grant of permission for a cattle underpass along with ancillary works on the Castlethomas Road. The permitted underpass traverses the Castlethomas Road which is also the location for the proposed cable route. The installation of the onshore cable route will not interfere with the Road Underpass and this matter has already been the subject of consultation with the relevant party. The design team have confirmed that the construction and operation of the permitted underpass will not restrict the construction and operation of the proposed cable route.

5.7.1.3 Restaurant – LCC Reg. Ref. 23/399

LCC Reg. Ref. 23/399 is a current application for permission for change of use of a residential property to a restaurant and all associated works, at an existing dwelling at Keenans Cross, Tullydonnell. Further information was requested on the proposed development on the 26 October 2023, seeking further detail on the operation of the restaurant, signage, traffic safety, surface water and wastewater treatment at the site. The existing dwelling is located on the north-eastern side of Keenan's Cross. The proposed cable route runs along the local road through Keenan's Cross in an east-west direction. While there is a slight overlap in the site boundaries, is considered that the proposed restaurant, if permitted, will not have an impact on the location of the proposed cable route.

5.7.1.4 Communications Structure – LCC Reg. Ref. 21/417

LCC Reg. Ref. 21/417 is a grant of permission for a 18 m high free-standing communications structure with associated antennae, communication dishes and ground equipment on a site adjacent to the site boundary, located on the southern side of Togher Road, to the west of the R166. The proposed cable route runs along Togher Road and it is considered that the permitted development will have no impact on the proposed development.

5.7.2 Relevant Planned Developments Irish Sea

There are a number of relevant planned developments that are also proposed to be located within the Irish Sea and who have also secured a MAC. The most proximate of these developments to the subject Project is the North Irish Sea Array (NISA Project) which is located to the south of the offshore wind farm area of the Project. In all instances, the Applicant has engaged with the relevant developers insofar as these developments may have relevance to the Project.

6 KEY CONSENTING LEGISLATION

6.1 Maritime Jurisdiction Act 2021

The *Maritime Jurisdiction Act 2021* (MJA) was commenced on 22 November 2021 (save for Section 32 and 33). The purpose of the MJA is to update and set out in one standalone enactment, the law relating to the State's maritime jurisdiction, including giving further effect to relevant provisions of the 1982 United Nations Convention on the Law of the Sea, and to repeal Sections 2 and 3 of the Continental Shelf Act 1968 and Part 3 of the Sea-Fisheries and Maritime Jurisdiction Act 2006, and to provide for related matters.

As illustrated in Figure 6-1, the MJA defines the extent of the maritime area of Ireland. It provides that the jurisdiction of the State includes the Irish Territorial Waters (i.e. the Foreshore Area between the Mean High Water Mark and the 12 nautical mile / nm limit), the Irish Exclusive Economic Zone / EEZ (the area between the 12 nm limit and the 200 nm limit) and the Agreed Continental Shelf area that pertains to Ireland. The offshore elements of the Project are located within Irish Territorial Waters.

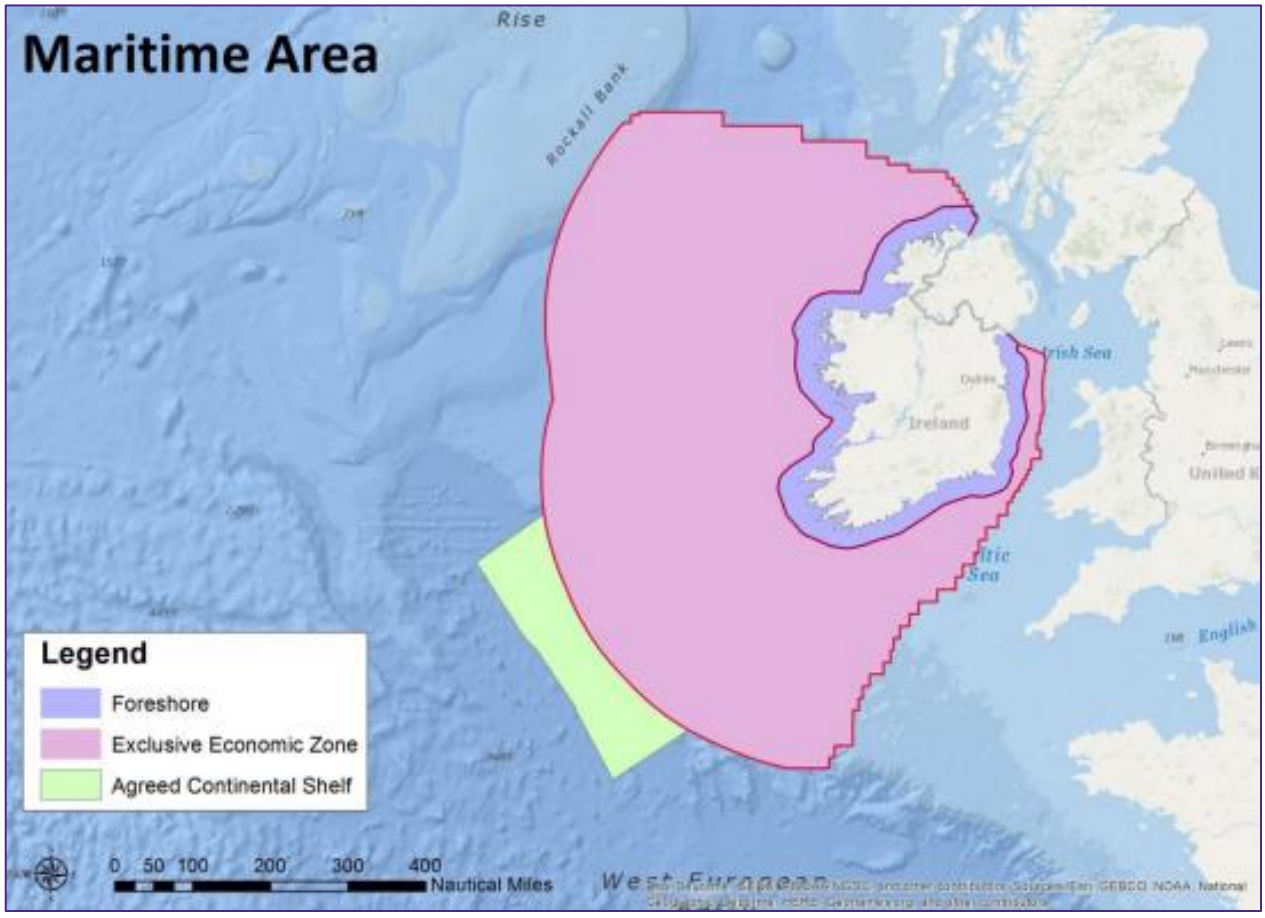


Figure 6-1: Map of the Maritime Area of Ireland.

Source: General Scheme of the Marine Planning and Development Management Bill, Frequently Asked Questions

6.2 Maritime Area Planning Act 2021

Following the commencement of the MJA, the *Maritime Area Planning Act 2021* (MAPA) was enacted in December 2021. It allows for a transition from the previous marine management regime, which was provided for under the Foreshore Act 1933, as amended. The MAPA establishes in law a marine planning regime and provides that two separate consents are required for the development of offshore renewable energy projects. Firstly, a state consent known as a Marina Area Consent (MAC) is required to occupy a designated part of the maritime area; and, secondly, a development consent is required to allow for the development of that area. The subject application is seeking development permission for the Project.

Section 80 and schedule 5 of the MAPA set out the broad criteria that must be fulfilled in order to obtain a MAC prior to seeking development permission. The criteria that the Minister must have had regard to when deciding MAC applications includes the nature, scope and duration of the occupation of the maritime area; whether the proposed maritime usage is in the public interest; whether the Applicant is a fit and proper person; the National Marine Planning Framework; the level of preparatory work already undertaken in relation to the project; and the level of stakeholder engagement in relation to the project. Given that the subject proposal met all of the relevant MAC criteria, it received a MAC from the Minister for Environment, Climate and Communications with a commencement date of 23 December 2022.

6.3 Planning and Development Act 2000, as amended

Part 8 of the MAPA inserts Part XXI into the Planning and Development Act 2000, as amended (the Act). This enables planning authorities to consider applications for development in the maritime area for development located partly in the outer maritime area, partly in the nearshore of one or more Coastal Planning Authority (CPA) and partly on land are submitted to ABP. In the subject instance, the Board is the relevant authority for the purposes of granting approval for development for the Project. The subject application for permission for development is being made under section 291 of the Act.

With regard to design flexibility and pursuant to Section 287A of the Act, the Applicant submitted an application for an opinion under Section 287B of the Act. In order to secure an opinion from the Board in relation to design flexibility aspects of the project, a Section 287A meeting was held on 11 December 2023. ABP issued their Opinion in relation to design flexibility in a letter dated 2 February 2024. The Project includes design flexibility consistent with the opinion provided under Section 287B of the Act.

6.4 Climate Action and Low Carbon Development Act 2015, as amended

The Climate Action and Low Carbon Development (Amendment) Act 2021 amends numerous Acts including the Planning and development Act 2000. It places particular obligations on An Bord Pleanála which is the relevant body for the purposes of the proposed development. Section 17 of the Climate Action and Low Carbon Development Act 2015, as amended (which, *inter alia,* amends Section 15 of the Principal Act) states that the Board (i.e. the relevant body):

*"**Shall** in so far as practicable, performs its functions in a manner consistent with:*

(a) "The most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (emphasis added by RPS)

The Board therefore is obliged to perform its role in assessing the subject application in a manner that is consistent with the National Climate Policies and Objectives, including the Climate Action Plan 2023 and the Climate Action Plan 2024. In this respect, it is noted that National Climate Policies and Objectives all support the development of wind farms subject to proper planning and sustainable development. The details of these plans are set out in section 7.2.5 and section 7.2.6 of this report.

6.5 Requirement for Environmental Impact Assessment

The *EIA Directive 2011/92/EU* on the assessment of the effect of certain public and private projects on the environment (codification), as amended by EIA Directive 2014/52/EU (the EIA Directive), sets out the process by which the anticipated effects of public and private projects on the environment are assessed. The means of achieving this objective are laid down in Article 2(1) of the EIA Directive, which states that, before development consent is given, projects likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment.

The EIA Directive harmonises the principles of EIA by introducing minimum requirements, in particular with regard to the type of projects that should be subject to assessment, the main obligations of developers, the content of the assessment and the participation of the competent authorities and the public.

Article 4 of the EIA Directive makes provision for EIAs in respect of certain projects listed in Annexes I and II of that Directive. Annex I of the EIA Directive lists developments for which EIA is mandatory and Annex II lists projects which require a determination as to whether they shall be made subject to an EIA. Member States shall make that determination through a case-by-case examination or thresholds or criteria set by the Member State. Where a case-by-case examination is carried out, or thresholds or criteria are set for the purpose of paragraph two of the EIA Directive, the relevant selection criteria set out in Annex III shall be taken into account.

The obligations set out in the EIA Directive have been implemented into Irish law by, *inter alia,* the Act and the relevant provisions of the Regulations. Section 172 of the Planning and Development Act, 2000, as amended sets out the requirement for an Environmental Impact Assessment Report (EIAR) as follows:

"172 (1) An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either—

(a) the proposed development would be of a class specified in—

(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either—

(I) such development would exceed any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or

(ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either—

(I) such development would exceed any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or

(b)(i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and

(ii) it is concluded, determined or decided, as the case may be, —

(I) by a planning authority, in exercise of the powers conferred on it by this Actor the Planning and Development Regulations 2001 (S.I. No. 600 of 2001),

(II) by the Board, in exercise of the powers conferred on it by this Act or those regulations,

(III) by a local authority in exercise of the powers conferred on it by regulation120 of those regulations,

(IV) by a State authority, in exercise of the powers conferred on it by regulation123A of those regulations,

(V) in accordance with section 13A of the Foreshore Act, by the appropriate Minister(within the meaning of that Act), or

(VI) by the Minister for Communications, Climate Action and Environment, in exercise of the powers conferred on him or her by section 8A of the Minerals Development Act 1940, that the proposed development is likely to have a significant effect on the environment"

The prescribed classes of development and thresholds that trigger a mandatory EIA and the provision of an EIAR are set out in Schedule 5 of the Regulations. The classes under Schedule 5 that are relevant to the Project are listed below:

> *"Part 2 Class 3 Energy Projects*
>
> *(i) Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts."*

The Project will generate 375 MW from 25 no. offshore wind turbines and therefore is a class of development that screens in for EIA and for which the preparation of an EIAR is mandatory.

To facilitate the Board in carrying out the necessary assessment, the application documentation includes an EIAR that is set out in 2 no. Volumes as follows:

- Volume 1 – Non-technical summary;

- Volume 2A – Chapters 1 – 6 and associated technical appendices. The chapters in this volume provide a description of the Project (chapter 5), the consideration of alternatives (chapter 4) and information on consultation (chapter 6). Chapter 3: includes the EIA methodology and the information presented in this chapter explains the structure and approach to the assessment chapters provided in volumes 2B and 2C;
- Volume 2B – Chapters 7-16 and associated technical appendices. The chapters in this volume provide the assessments on marine receptors including marine mammals, fish and shellfish ecology, etc.; and
- Volume 2C – Chapters 17-32 and associated technical appendices. The chapters in this volume provide the assessments on the onshore receptors including population and human health, onshore biodiversity, etc. Interactions are outlined in chapter 32.

In accordance with the requirements of the *Environmental Impact Assessment (Amendment) Regulations 2018*, each technical assessment has been carried out by a specialist in the relevant field to the current impact assessment guidance (as outlined in chapter 1, volume 2A).

6.6 Requirement for Appropriate Assessment

The Habitats and Birds Directives (*Directive 92/43/EEC* and *Directive 2009/147/EC*) are the cornerstones of the EU nature conservation policy. These provisions set out various procedures and obligations in relation to nature conservation management in EU member states in general, and habitats and species of European importance, in particular.

Articles 3 to 9 of the Habitats Directive provide the EU legislative means to protect habitats and species of interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These Natura 2000 sites include Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive. In addition, Irish legislation incorporates candidate SAC and proposed SPA within the definition of *"European sites"*, thus providing those candidate and proposed areas with the same level of protection as sites which have completed the formal designation process.

A key protection mechanism is the requirement to consider the possible nature conservation implications of any plan or project on the Natura 2000 site network before any decision is made to allow that plan or project to proceed. The Directive requires, *inter alia*, that any plan or project not directly concerned with or necessary to the management of the protected site but likely to have a significant effect thereon shall be the subject of an appropriate assessment on the implications for the site in view of the site's conservation objectives. In the light of conclusions of the assessment of the implications for the site, the competent authority shall grant development consent only after having ascertained that it will not adversely affect the integrity of the site concerned.

In order to comply with the requirements of EU and Irish law, and to facilitate the Board in carrying out the necessary AA, Habitats Directive Appraisals are submitted with the application for development permission, which include both an AA Screening and a NIS.

6.7 Requirement for a Dumping at Sea Permit

A Dumping at Sea permit is required for the disposal of a substance or material at sea under the Foreshore and Dumping at Sea (Amendment) Act 2009.

As outlined in chapter 5: Project Description, the soil and rock arising from the drilling for the installation of the foundations for the Project will be returned to the area adjacent to the foundation location through a fall pipe below the sea surface to minimise dispersion of the drill arisings. As a result of this and other construction activities which result in the redistribution of material in the marine environment, a Dumping at Sea Permit application will be submitted to the Environmental Protection Agency.

7 PLANNING AND DEVELOPMENT POLICY CONTEXT

This section of the Planning Report sets out the relevant planning and development policy context. It firstly considers relevant policies and directives at a European level before then addressing key planning policies at a national, regional and local planning policy level against which the Project will be assessed.

7.1 Relevant European Planning and Development Policy

In 2007 the EU adopted an Integrated Maritime Policy (EU-IMP) which seeks to provide a more coherent approach to cross-cutting maritime issues, with increased coordination between different policy areas such as blue growth, marine data and knowledge, integrated maritime surveillance, sea basin strategies and maritime spatial planning. EU-IMP encourages all coastal Member States to develop integrated maritime policy and plans at a national level. This has since been supported by numerous policy initiatives and legislative measures, the most up-to-date of which are set out in this section.

7.1.1 European Maritime Spatial Planning Directive

In 2014, the adoption of the European Maritime Spatial Planning Directive 2014/89/EU established a European Union (EU)-wide framework for maritime spatial planning. It is aimed at promoting the sustainable growth of maritime economies, the sustainable development of marine areas and the sustainable use of marine resources. The Directive details the main goals and minimum requirements for Member States as follows:

- Balanced and sustainable territorial development of marine waters and coastal zones;
- Optimised development of maritime activities and business climate;
- Better adaptation to risks; and
- Resource-efficient and integrated coastal and maritime development.

The Directive defines maritime spatial planning as "*… a process by which the relevant Member State's authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives"* (Directive 2014/89/EU).

Ireland transposed the Directive through the *European Union (Framework for Maritime Spatial Planning) Regulations 2016* (S.I. No. 352/2016). In so doing, it established the necessary legal basis and broad framework for Ireland to implement a National Marine Spatial Plan. A National Marine Spatial Plan, which, *inter alia*, takes into account land-sea interactions and contributes to the sustainable development of energy sectors at sea, was required to be in place by 31 March 2021.

Since the regulations were made under the *European Communities Act 1972*, they were strictly limited to measures required to transpose the Directive. In October 2018, the regulations were repealed and replaced by Part 5 of the *Planning and Development (Amendment) Act 2018*. Part 5 re-transposes the Directive in primary legislation and contains a number of measures that are additional to those required by the directive, including:

- Adoption of the National Marine Planning Framework (NMPF) by both Houses of the Oireachtas;
- Review and replacement of the NMPF every 6 years;
- Obligation for marine regulatory bodies to secure the objectives of the NMPF when making policies, plans, or granting consents; and
- Enforcement powers for the Minister if the foregoing obligations are not being fulfilled.

Following a period of extensive public consultation, Seanad Éireann passed a motion approving Ireland's NMPF on 29 April 2021, and Dáil Éireann on 12 May 2021, with the NMPF coming into effect on the 01 July 2021. Further detail regarding Ireland's NMPF is outlined in section 7.2.2 below.

7.1.2 2030 EU Climate and Energy Framework

The *2030 EU Climate and Energy Framework* provides a framework for climate and energy policies in Europe. It was agreed by EU leaders in 2018. This framework seeks a 40% reduction in EU greenhouse gas emissions from 1990 levels and a greater contribution from renewable energy.

7.1.3 EU Green Deal

The EU Green Deal published in 2019 commits Ireland to achieve carbon neutrality by 2050. The EU's 2030 emissions reduction goals have also been increased to at least a 55% cut by 2030, compared with 1990 levels. The European Green Deal provides an action plan to boost the efficient use of clean resources, restore biodiversity and cut pollution. The plan also outlines investments needed and financing tools available and explains how to ensure a just and inclusive transition. Renewable energy from wind power is already 15% of Europe's electricity and the International Energy Agency expects wind to become our number one source of power generation by 2027.

The Project will contribute to Ireland's commitments in terms of the EU Green Deal by providing a significant beneficial impact through the replacement of fossil fuel use in electricity generation by renewable electricity generation. In addition, it is important to note that the Project has been designed and is proposed to be built and operated in line with international best practice and guidelines. Also, as set out in section 1.4, the Applicant has a track record in delivering projects of this type.

7.1.4 Renewable Energy Directive 2018/2001/EU

This EU Renewable Energy Directive became legally binding in 2021. It initially set the overarching European renewable energy target of 32% and establishes rules to ensure the uptake of renewables for heating and cooling purposes and in the transport sector. It also, *inter alia*, includes common principles and rules for renewables support schemes, the rights for production and consumption of renewable energy and to develop renewable energy communities, and empowers citizens, consumers and businesses to participate in the transition to clean energy.

The Revised Renewable Energy Directive which came into force on 20 November 2023 sets an overall renewable energy target of at least 42.5% binding at EU level by 2030. Given the nature of the Project, which can deliver a significant volume of offshore wind energy, it is fully in accordance with the binding EU Renewable Energy Directive.

7.1.5 EU Fit for 55 Package

The EU Fit for 55 Package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and by making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy, and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%. The Project directly delivers renewable energy and accords with the EU Fit for 55 Package.

7.1.6 EU Strategy on Adaption to Climate Change

The EU Strategy on Adaptation to Climate Change is an integral part of the European Green Deal which sets out the pathway to adapt to the unavoidable impacts of climate change and become climate resilient by 2050. The strategy is underpinned by four objectives, namely: to make adaptation smarter, swifter and more systemic, and to step up international action on climate change. The four objectives are further underpinned by fourteen actions and the steps required to deliver them.

The EU has adopted integrated monitoring and reporting rules to ensure progress towards its 2030 climate and energy targets and its international commitments under the 2015 Paris Agreement. Given that the nature of the Project is seeking to generate 375 MW of renewable energy, it will help the EU combat climate change. The Project complies with this Strategy as it will help Ireland become more climate resilient once during its operational phase.

7.1.7 EU Strategy on Offshore Renewable Energy

To help meet the EU's goal of climate neutrality by 2050, the European Commission in November 2020 published the EU Strategy on Offshore Renewable Energy. The Strategy proposes to make offshore renewable energy a core component of Europe's energy system by 2050 and specifically increase Europe's offshore wind capacity from its current level of 12 GW to at least 60 GW by 2030 and 300 GW by 2050. The Commission aims to complement this with 40 GW of ocean energy from other emerging technologies such as wave, tidal and floating solar by 2050. The Project is wholly in accordance with the key objective of the Strategy in delivering increased offshore wind energy generation.

7.1.8 REPowerEU

As set out in section 2.3 of this report, REPowerEU is a joint European action for more affordable, secure and sustainable energy. This policy arose from the global energy market disruption caused by Russia's invasion of Ukraine. The REPowerEU Plan seeks to accelerate clean energy transition; diversity energy sources; and reduce demand.

A key objective of REPowerEU is to reduce dependence on fossil fuels and increase European renewables target for 2030 from 40% to 45%. Wind energy generation is identified as one means of addressing this, specifically generating 80 GW of wind energy by 2030 and 300 GW by 2050. As the Project proposes to generate 375 MW of renewable wind energy, it can assist in the REPowerEU objective of seeking more affordable, secure and sustainable energy.

7.1.9 EU Wind Power Action Plan

The *EU Wind Power Action Plan*, published by the European Commission in October 2023, sets out immediate actions to be taken together by the European Commission, Member States and industry to support the wind energy sector. The EU Wind Power Action Plan aims to ensure that the clean energy transition goes hand-in-hand with industrial competitiveness and that wind power continues to operate successfully within the EU. The six main areas that it focuses on are set out in Figure 7-1. The project is wholly in accordance with the Action Plan as it can contribute towards the acceleration of deployment of renewable energy generation in Ireland.

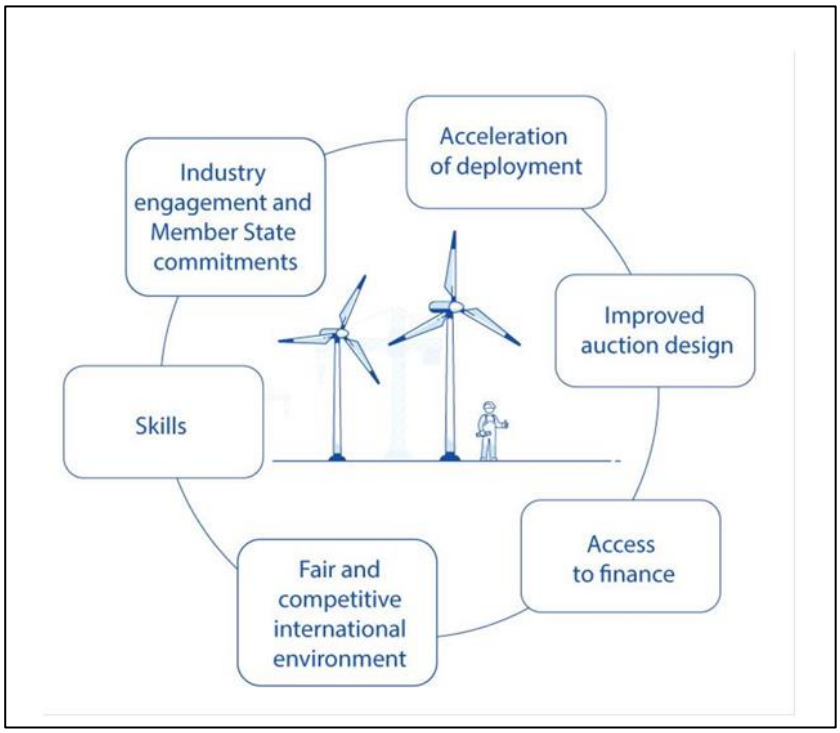


Figure 7-1: Schematic Representation of Issues Addressed in EU Wind Power Action Plan.

Source: *EU Wind Power Action Plan*

7.1.10 European Wind Charter

The European Wind Charter builds upon the recent EU Wind Power Action Plan. Ireland signed up to the Charter in December 2023. The signatory Member States and wind sector representatives respectively commit to many renewable energy related objectives with which the project aligns, most notably:

1. Ensure a sufficient, robust and predictable pipeline for the deployment of wind energy, including through updated National Energy and Climate Plans (NECPs) coherent with the more ambitious Fit-for-55 renewable energy targets, faster and more predictable permitting.
2. Ensure that business processes, governance, products and services offered by the undersigning wind sector representatives satisfy high qualitative standards.

In terms of the first aforementioned commitment, the Applicant has sought and continuing to seek to secure all necessary permits for the Project as via a faster and more predictable permitting process. In terms of the second commitment, high standards have been used in the Applicant's approach to all facets of this Project.

7.2 Relevant National Planning and Development Policy

In this section, relevant national planning and development policies are considered in relation to the Project. In addition, Table 7-2 lists the other relevant national policy documents that are applicable to the Project and provides a brief comment on their relevance.

7.2.1 Overview of the Irish Planning System

The remit of the Irish Planning System now includes both the terrestrial and the marine environment. While onshore planning policies have remained relatively consistent over the past 20 years, Ireland has realised a meaningful shift in terms of the putting in place of marine planning policy. This has most notably been achieved as a result of the publication of the NMPF which came into effect in July 2021.

In all instances, European, national, regional and local planning policy inform the assessment and decision making process in relation to planning applications. Figure 7-2 sets out a general schematic overview of the various authorities that are operating the marine planning system. While the Marine Planning Policy Statement (MPPS) sits at the centre of marine planning policy in Ireland, the critical basis for decision making for all maritime applications is the NMPF. It is also noted that Designated Maritime Area Plans (DMAPs) are also provided for in the MAPA and once adopted, these form part of the NMPF.

- **MPPS:** Published by the Department of Housing, Local Government and Heritage in 2019, the Marine Planning Policy Statement (MPPS) sets out a vision for the development of a fully integrated Marine Planning System, based on three coherent building blocks of forward planning, development management and enforcement. It identifies how Ireland will achieve its 2030 targets for greenhouse gas emissions in a manner consistent with a trajectory to achieve net zero emissions by 2050.

  The project is being brought forward in the context of and in accordance with the recently established marine planning system. Most notably, the project will help Ireland to achieve its 2030 greenhouse gas emissions and its 2050 net zero emissions target.

- **NMPF:** The NMPF contains overarching marine planning policies that are applicable to all proposals in Ireland's extensive maritime area which comprises an area of approximately 490,000 km^2. The NMPF operates in parallel to the National Planning Framework (NPF), as it sets out the Government's long-term planning objectives and priorities for the management of our seas over a 20-year time frame.

- **DMAPs:** These are sub-national marine spatial plans that focus on specific maritime activities that may either have a sectoral policy focus or a multi-sectoral policy focus and generally have a defined geographic boundary. DMAPs must expand upon the vision of the NMPF and ultimately add value to the NMPF.

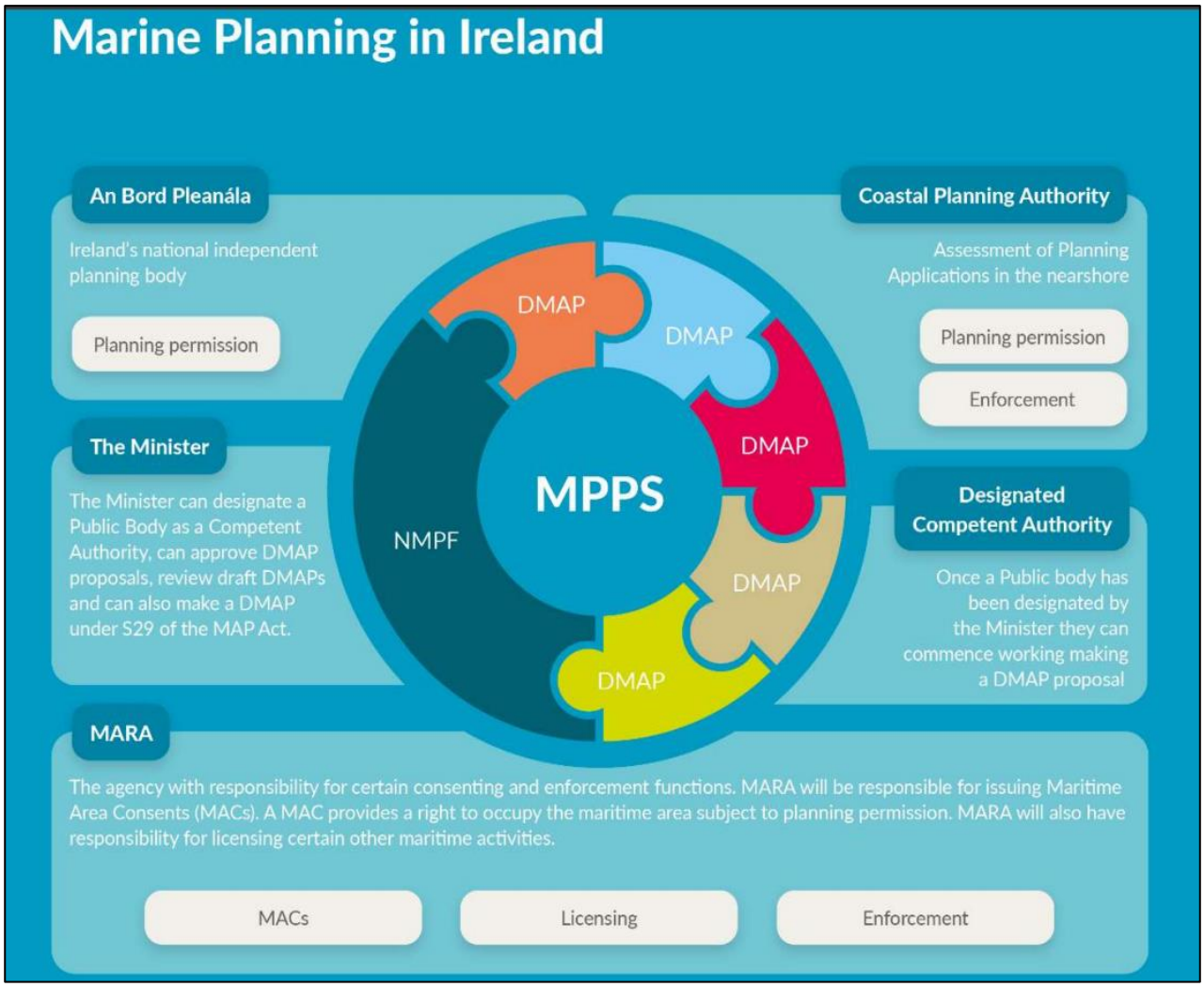


Figure 7-2: General Schematic Overview of Marine Planning Policy in Ireland.

Source: Presentation by Karina Fitzgerald of the Department of Housing, Local Government and Heritage to the Irish Planning Institute, November 2023

7.2.2 National Marine Planning Framework

The NMPF contains overarching marine planning policies that are applicable to all proposals in Ireland's extensive maritime area. Public bodies are legally obliged to secure the objectives of the NMPF. Given the significantly important role that the NMPF has in relation to the Project, we have systematically considered the Project having regard to each of the 92 no. policies contained in the NMPF – please refer to Appendix A of this report which contains further details in this respect. The NMPF contains numerous overarching economic and social marine planning policy objectives and it also highlights the importance of environmental protection of the maritime area. The NMPF policies that are particularly relevant to the Project and with which the subject proposal is consistent, are set out in the sub-sections below.

7.2.2.1 Offshore Renewable Energy Policy

"ORE Policy 1 ***– Proposals that assist the State in meeting the Government's target of generating at least 5 GW of offshore renewable electricity by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity, in line with decarbonisation targets should be supported.*** *All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users*. (Emphasis added)

The Project will directly enable this policy by providing infrastructure that can generate 0.375 GW of offshore renewable electricity by 2030.

"ORE Policy 2 – ***Proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (OREDP) and its successor.*** *Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime…"* (Emphasis added)

The Project is consistent with OREDP policy and its successor as detailed in this report and can enable the delivery of the Government's 2030 targets.

"ORE Policy 8: Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required."

The project location was chosen to avoid areas of existing offshore infrastructure such as cables and pipelines. The offshore geophysical surveys and desktop research has confirmed that no existing cables are located within or adjacent to the area and that requirements to repair of carry out remedial work would not be compromised. In addition, the location of the cables has been designed to ensure that it can be easily repaired if required. Further details in this respect are contained in chapter 4: Consideration of Alternatives and chapter 5: Project Description of the EIAR.

"ORE Policy 9 – A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. This consideration must be included as part of statutory environmental assessments where such assessment is required."

Accordingly, a visual assessment has been undertaken and is included in the enclosed EIAR (chapter 27: Seascape, Landscape and Visual Amenity).

"ORE Policy 11 – Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported."

The Project proposes to be provided via the provision of emerging renewable energy technologies. For this reason a certain degree of design flexibility is required. Further details in this respect are provided in chapter 5: Project Description of the accompanying EIAR.

7.2.2.2 Infrastructure Policy

"Infrastructure Policy 1 – Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported."

The Project will result in marine activity and associated increased employment opportunities for marine related industries at ports that will be used to facilitate the construction, operation, and maintenance, and decommissioning of the offshore wind farm. The requirements for marine activity and associated industries from the Project will result in the diversification of marine activity in these ports that in turn, will support the regeneration of marine industries. The Project is therefore in accordance with Infrastructure Policy 1. Further details can be found in the enclosed EIAR.

7.2.2.3 Biodiversity Policy

"Biodiversity Policy 1 – Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements:

a) avoid,

b) minimise, or

c) mitigate

significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity."

Please refer to Appendix A which considers the Project in relation to the Biodiversity Policy of the NMPF. It should be noted that the layout of the Project has been designed and located having regard to best practice methodologies to protect biodiversity. In addition, it is noted that chapters 8, 9 10, 11 (included in volume 2B) and 19 (volume 2C) of the EIAR includes an analysis of impacts of the Project on biodiversity. More specifically:

- Chapter 8: Benthic Subtidal and Intertidal Ecology concluded that there will be no significant effects arising from the Project during the construction, operational and maintenance or decommissioning phases, with effects ranging from slight to imperceptible (i.e. not significant in EIA terms). The Environmental Management Plan (EMP)) and Marine Pollution Contingency Plan (both included in appendix 5-2 of the EIAR) ensure that the potential for release of pollutants from all phases of the Project, is minimised. Pre-construction surveys for unidentified reef habitat and reinstatement of rock in the intertidal zone will also help avoid impacts on any identified reef habitat and promote recovery of intertidal habitat.
- Chapter 9: Fish and Shellfish Ecology concluded potential impacts to be imperceptible to slight adverse significance (not significant in EIA terms). An EMP and Marine Pollution Contingency Plan (MPCP) will ensure that the potential for release of pollutants from all phases of the Project, is minimised. Cable burial depth and use of rock-armour where the full cable burial depth cannot be achieved will help increase the separation distance of fish from cable. Soft start piling operations will minimise the risk of injury to fish species.
- Chapter 10: Marine Mammals and Megafauna concluded potential impacts to be imperceptible to slight adverse significance (not significant in EIA terms). An EMP will ensure that the potential for release of pollutants from all phases of the Project is minimised. A Marine Megafauna Mitigation Plan (appendix 5-4) and soft start piling operations will mitigate for the risk of physical or permanent auditory injury to marine mammals. Additionally, a Vessel Code of Conduct (appendix 5-5) and cable burial depth will minimise the potential for collision risk, or potential injury.
- Chapter 11: Offshore Ornithology concluded potential impacts imperceptible to slight adverse significance (not significant in EIA terms). An EMP will minimise disturbance to rafting birds, and a MPCP will ensure that the potential for release of pollutants from all phases of the Project, is minimised.
- Chapter 19: Onshore Biodiversity includes an analysis of the impacts of the Project on onshore biodiversity. It concluded that disturbance to intertidal birds at the cable landfall was deemed to be not significant to onshore biodiversity receptors in the study area. The proposed works have the potential to affect protected birds within the intertidal area; however, the timing of the works to avoid the peak bird season reduced any potential impact.

"Biodiversity Policy 2 – Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats."

- Chapters 8, 9, 10, 11 and 19 of the EIAR concluded that the potential impacts of the Project are not significant in EIA terms. Please refer to Appendix A for further details in this respect.

"Biodiversity Policy 4 – Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements:

a) avoid,

b) minimise, or

c) mitigate

significant disturbance to, or displacement of, highly mobile species."

Table 9-8 from chapter 9: Fish and Shellfish Ecology of the enclosed EIAR includes a 'Summary of fish and shellfish important ecological features (IEFs) and their value/importance within the Fish and Shellfish Ecology Study Area' and identifies mobile species with a risk of potential significant negative impact. Chapter 9 concludes that with the proposed designed-in measures in place, these potential impacts result in effects that are imperceptible to slight adverse significance (not significant in EIA terms). Chapter 9 from the accompanying EIAR fully address all relevant biodiversity policies.

Table 10-10 from chapter 10: Marine Mammals and Megafauna of the enclosed EIAR includes a 'Marine mammal and megafauna Important Ecological Features (IEFs) and their importance within the Marine Megafauna Study Area' and identifies mobile species with a risk of potential significant negative impact. Chapter 10 concludes that with the proposed designed-in measures in place, these potential impacts result in effects that are imperceptible to slight adverse significance (not significant in EIA terms). Chapter 10 from the accompanying EIAR fully address all relevant biodiversity policies.

Chapter 11: Offshore Ornithology of the enclosed EIAR presents the birds species recorded within Offshore Ornithology Study Area, in addition to species sensitivity to disturbance and displacement and species collision risk assessment. Chapter 11 concludes that with the proposed designed-in measures in place, these potential impacts result in effects that are imperceptible to slight adverse significance (not significant in EIA terms). Chapter 11 from the accompanying EIAR fully address all relevant biodiversity policies.

Table 19-8 from chapter 19: Onshore Biodiversity of the enclosed EIAR includes a 'Summary Valuation of Ecological Features and Identification of Features Scoped for Impact Assessment' and identifies mobile species with a risk of potential significant negative impact. Chapter 19 concludes that with the proposed designed-in measures in place, these potential impacts result in effects that are not significant. Chapter 19 from the accompanying EIAR fully address all relevant biodiversity policies.

7.2.2.4 Protected Marine Sites Policy

"Protected Marine Sites Policy 1 – Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.

Protected Marine Sites Policy 2 – Proposals supporting the objectives of protected marine sites should be supported and:

- *be informed by appropriate guidance*
- *must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites."*

The stage 1, Report to inform screening for Appropriate Assessment and the stage 2, NIS that have been prepared following applicable guidance as stated in the Department of the Environment, Heritage and Local Government guidance 'Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities'.

The Report to inform screening for Appropriate Assessment has concluded that, having regard to the methodology employed and the findings of the appraisal, it cannot be excluded, on the basis of objective scientific information, individually or in combination with other projects, that the Project will have likely significant effects European sites.

Accordingly, a Stage 2 appraisal has been undertaken. The NIS concluded that in view of best scientific knowledge and applying the precautionary principle, and in light of the conservation objectives of the relevant European sites, the Project, either individually or in combination with other plans or projects, will not have adverse effect on the integrity of any European site(s), given the implementation of the mitigation measures included in the Project outlined.

As such, the Project meets the requirements of Protected Marine Sites Policy 1.

7.2.2.5 Climate Change Policy

"Climate Change Policy 2 – For the lifetime of the proposal, the following climate change matters must be demonstrated:

- *estimation of likely generation of greenhouse gas emissions, both direct and indirect;*
- *measures to support reductions in greenhouse gas emissions where possible;*
- *likely impact of climate change effects upon the proposal from factors including but not limited to: sea level rise, ocean acidification, changing weather patterns;*
- *measures incorporated to enable adaptation climate change effects;*

- *likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities;*
- *where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements:*

  a) avoided,

  b) minimised,

  c) mitigated,

  d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out".

The Project will lead to the generation of renewable electricity and as a result of this, the Project has the potential to reduce the generation of fossil fuel emissions at gas, peat and coal powered plants across the State. Chapter 17: Climate (volume 2C) of the EIAR has found that the Project has the potential to displace approximately 489,300 tonnes of CO_{2eq} from the largely carbon-based traditional energy mix in the national grid per annum (based on the 2021 grid). As such, the Project is predicted to have a have a net major beneficial impact on climate which is considered significant. It is therefore considered that the Project accords with NMPF policy on climate change. Further details are provided in chapter 17: Climate of the accompanying EIAR. In addition, a coastal erosion assessment has also been completed and this is included in appendix 21-1: Coastal Erosion Report.

7.2.2.6 Co-existence Policy

"Co-existence Policy 1 – Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference: a) minimise significant adverse impacts, b) mitigate significant adverse impacts, or c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding."

The impact of the Project on commercial fisheries is considered in chapter 12: Commercial Fisheries (volume 2B) of the accompanying EIAR and found there will be no significant effects arising from the Project during the construction, operational and maintenance or decommissioning phases.

The impact of the Project on shipping and navigation is considered in chapter 13: Shipping and Navigation (volume 2B) of the accompanying EIAR and found there are no significant effects on shipping or navigation.

The impact of the Project on aviation, military and communications is considered in chapter 14: Aviation, Military and Communications (volume 2B) of the accompanying EIAR, which concluded there will be no significant effects arising from the Project during the construction, operational and maintenance or decommissioning phases.

The impact of the Project on population is considered in chapter 18: Population and Human Health (volume 2C) of the accompanying EIAR. It is considered that the Project will at all project lifecycle stages generate employment, stimulate activity at port facilities and impact positively on the population.

It is concluded that that there are no significant adverse impacts on other activities and the Project allows for the continued co-existence and co-operation with other activities.

7.2.2.7 Employment Policy

"Employment Policy 1 – Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are:

- *In line with the skills available in Irish coastal communities adjacent to the maritime area,*
- *Improve the sustainable use of natural resources,*
- *Diversify skills to enable employment in emerging industries."*

The Project generates employment directly and indirectly at the construction, operation and decommissioning phases. This is considered further in chapter 18: Population and Human Health (volume 2C) of the accompanying EIAR.

7.2.2.8 Seascape and Landscape Policy

"Seascape and Landscape Policy 1 – Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference: a) avoid, b) minimise, orc) mitigate significant adverse impacts on the seascape and landscape of the area. D) If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding. This policy should be included as part of statutory environmental assessments."

As part of the project design process, a number of measures have been proposed to avoid and minimise the potential for impacts on Seascape, Landscape and Visual Amenity as set out in Table 7-1 below and further detailed in chapter 27: Seascape, Landscape and Visual Assessment in the enclosed EIAR.

Table 7-1: Measures included in the Project to avoid and reduce impacts on seascape, landscape and visual amenity.

Measures included in the Project	Rationale
The use of colour and façade style on the onshore substation buildings.	To reduce the impact of the onshore substation building on landscape and on visual receptors.
Turbine towers and blades will be to a uniform colouration.	Colouration of the turbines and blades will be to industry standard (light grey) which reduces visibility of the wind turbines in typical overcast, conditions.
Turbine locations are spaced to reduce visual clutter and avoid overlap with background landscape.	To provide visual uniformity and visual coherence in views.
Turbines will be of identical rotor diameter.	To provide visual uniformity and visual coherence in views.
The onshore cable route is primarily within the existing roadways / roadside verges and thereby minimises the severance of farmed landscape and landscape features including hedgerows, trees and woodland.	To reduce the impact of the Project upon existing landscape features and landscape character.
HDD technology will be used to facilitate the M1 Road/Rail crossing, the two River Dee crossings (Drumcar and Richardstown), the Port Stream at Togher, the stream at Salterstown to limit the impact on landscape features.	To limit the impact of the Project on landscape elements (farmland, vegetation, and watercourses) and landscape character at these specific locations.
The chosen location for the onshore substation is as close as is possible to the existing Woodland – Louth 220 kV overhead line within a landscape at relatively low elevation and featuring wooded cover.	To reduce the impact of the Project on landscape character and nearby residential settlements and dwellings.
Replacement hedgerow planting at locations along the onshore cable route.	Replacement planting for hedgerows removed. Shallow rooting species where required over the onshore cable route to prevent disturbance of the cables by roots.
Restoration and repair of gates and fences that have been removed/damaged during the construction works.	Replacement of existing features forming part of the existing landscape character and/ or visual resources.

7.2.2.9 Transboundary Policy

"Transboundary Policy 1 – Proposals that have transboundary impacts beyond the maritime area, on either the terrestrial environment or neighbouring international jurisdictions, must show evidence of consultation with the relevant public authorities, including terrestrial planning authorities and other country authorities. Proposals should consider transboundary impacts throughout the lifetime of the proposed activity."

The potential for transboundary impacts of the Project are considered in the enclosed EIAR. Consultation was also undertaken with the departments and ministries in Northern Ireland, the UK and the Isle of Man regarding the potential for transboundary impacts from the Project. The outcome of consultation on transboundary issues is outlined in chapter 6: Consultation (volume 2A) of the EIAR. In addition, information on transboundary state consultation is provided in section 4.8 of this report.

Overall, it was concluded that there will be no transboundary effects arising from the Project. This was due to the regional extent of the effect and the measures put in place to minimise the risk of significant effects.

7.2.2.10 Transmission Policy

"Transmission Policy 1 – Subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland's energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations. This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government's target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system / interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems."

The Project, which is subject to an EIAR, includes onshore and offshore transmission infrastructure connecting the proposed wind farm to the national grid. The proposed transmission infrastructure directly address the Government's target of 5 GW of offshore renewables by 2030.

7.2.2.11 Safety At Sea Policy

"Safety at Sea Policy 1 – Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will:

- *Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout; and*
- *Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels."*

The Safety at Sea Policy and the safe operation of the facility is considered in some detail in chapter 13: Shipping and Navigation of the EIAR and a project specific Navigation Risk Assessment (NRA) (see appendix 13-1 in volume 2B). The assessment has considered a variety of impacts and hazards associated with the Project drawing upon evidence presented from analysis, review of information and stakeholder consultation and concludes that:

"The assessment concludes that no over-riding navigational issues have been identified that presents an insurmountable threat to navigational safety for shipping, be that commercial, fishing or recreational.

It is the view of the Project consultants that, with the implementation of the recommended additional risk controls, this Project during the construction/decommissioning and operational and maintenance phases will not undermine navigational safety in the Study Area."

7.2.2.12 Sports and Recreation Policy

Sports and Recreation Policy 2 – Proposals should demonstrate the following in relation to potential impact on recreation and tourism:

- *The extent to which the proposal is likely to adversely impact sports clubs and other recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure.*
- *The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety.*
- *The extent to which the proposal is likely to adversely impact on the natural environment."*

The impact of the Project on recreation and tourism is through its impact on sports clubs and other recreational users, access to and along the shore, to the water, use of the resource for recreation or tourism purpose or the natural environment is considered to be minimal. The proposed development addresses any potential impacts and a robust EIAR has been prepared which addresses recreation, tourism and sports and that this policy requirement has been met.

The impact of the Project on recreational, amenity and community facilities has been considered in chapter 18: Population and Human Health (volume 2C) and chapter 16: Infrastructure, Marine Recreation and Other

Users (volume 2B) of the accompanying EIAR and is reported as being imperceptible or slight at the operational stage and slight adverse at the construction stage.

7.2.2.13 Tourism Policy 2

"Tourism Policy 2 – Proposals must identify possible impacts on tourism. Where a potential significant impact upon tourism is identified it should be demonstrated how the potential negative consequences to tourism in communities will be minimised. This must include assessment of how the benefits of proposals are not outweighed by potential negative impacts."

The impact of the Project on tourism has been considered in chapter 18: Population and Human Health of the EIAR. No potentially significant impact upon tourism has been identified.

7.2.3 Project Ireland 2040 – National Planning Framework

The NPF, published in July 2018, is the primary articulation of spatial, planning and land use policy in Ireland[6]. The NPF is based on directing development to existing settlements rather than allowing the continual expansion and sprawl of cities and towns. Section 7.2 of the NPF states that the maritime economy is a key enabler of effective regional development, especially in remote coastal communities.

In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to *"tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential".*

The NPF contains a specific section (Section 7.5) which is entirely focused on offshore renewable energy. It states that:

"Ireland's territorial waters present major opportunities in the blue economy and offshore renewable energy sectors, which would support our transition to a zero carbon economy.

The development of offshore renewable energy is critically dependent on the development of enabling infrastructure, including grid facilities *to bring the energy ashore and connect to major sources of energy demand".* (Emphasis added)

Section 7.5 of the NPF includes the following as National Policy Objective 42:

"To support, within the context of the Offshore Renewable Energy Development Plan (OREDP) and its successors, ***the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements****."* (Emphasis added)

The implementation of National Policy Objectives contained within the NPF are required to be further developed upon within the relevant Regional Spatial and Economic Strategies. The Project is wholly consistent with National Policy Objective 42 and relevant statements contained in Section 7.2 of the NPF as set out above as it concerns the progressive development of Ireland's offshore renewable energy potential and domestic grid connectivity enhancements and all necessary enabling infrastructure. In addition, the Project will support the local and regional economy.

7.2.4 National Development Plan 2021-2030

The National Development Plan 2021–2030 (NDP) identifies strategic priorities for public capital investment in order to underpin the implementation of the NPF. The NDP commits to increasing the share of renewable electricity up to 80% by 2030. It is a strategic priority of the NDP (state owned enterprise investment) to strengthen the electricity transmission and distribution grid onshore and offshore, including transmission cables and substations, to link renewable electricity generation to electricity consumers and to accommodate higher levels of renewables on the electricity system.

National Strategic Outcome 8 of the NDP is to transition to a climate neutral and climate-resilient society. To achieve this the NDP recognises that Ireland's ambition must go further than a focus on achieving

[6] It is noted that in July 2023, the process to revise the NPF as provided for in the Act commenced and at the time of writing a Draft NPF is currently being prepared and due to be published in June 2024.

compliance with international commitments and recognises the importance of achieving a low-carbon, climate-resilient and environmentally sustainable economy and society. The Project is wholly consistent with National Strategic Outcome 8 and all associated NDP policies.

7.2.5 Climate Action Plan 2023

The *Climate Action Plan 2023* (CAP 2023), published by the DECC is the second annual update to Ireland's Climate Action Plan. The CAP 23 implements the carbon budgets and sectoral emission ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050, to align with the Programme for Government. As stated in CAP 2023, Ireland's electricity sector can play a vital role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The plan proposed a measure to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9 GW from onshore wind, 8 GW from solar, and at least 5 GW of offshore wind energy by 2030.

The plan includes the following actions in relation to offshore wind energy development:

- Accelerate the delivery of onshore wind, offshore wind, and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 9 GW onshore wind, 8 GW solar, and at least 5 GW of offshore wind by 2030 (and an additional 2 GW offshore wind for green hydrogen production);
- Ensure a flexible and supportive spatial planning policy framework for onshore and offshore renewable electricity generation development that seeks to delivers a strong pipeline of renewables;
- Ensure that renewable energy generation projects and associated infrastructure are considered to be in the overriding public interest;
- Ensure MARA commences the consenting processes under its remit;
- The Offshore Wind Delivery Taskforce (OWDT) to publish a system-wide plan for the delivery of offshore wind; and
- Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.

The CAP 23 notes that offshore electricity generation sector is now operating at a very low level in Ireland, however, the scale of the opportunity has been estimated to be 70 GW. The DECC commits to updating the plan every 12 months in a manner that is underpinned by consultation with key stakeholders. Updates to the plan will be informed, *inter alia*, by corrective actions that may be needed to stay on track toward the overall 2030 targets and the ultimate objective of achieving a transition to a competitive, low-carbon, climate - resilient, and environmentally sustainable society and economy by 2050.

The Project directly addresses the overarching goals of the CAP and assists in delivering the new offshore renewable energy production supported by the CAP.

7.2.6 Climate Action Plan 2024

The *Climate Action Plan 2024* (CAP 2024) was published by the DECC in December 2023 and is currently in Draft form and subject to Strategic Environmental Assessment and Appropriate Assessment. CAP 2024 builds upon CAP 2023 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. As stated in CAP 2024, Ireland's electricity sector can play a vital role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The plan proposed a measure to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9 GW from onshore wind, 8 GW from solar, and at least 5 GW of offshore wind energy by 2030.

The plan includes the following notable actions in relation to offshore wind energy development:

- Accelerate the delivery of onshore wind, offshore wind, and solar to reach 80% of electricity demand from renewable energy by 2030;
- Target 9 GW onshore wind, 8 GW solar, and at least 5 GW of offshore wind by 2030;
- Transforming the flexibility of the electricity system by improving system services and increasing storage capacity;

- Progress the development of a proposal for an offshore renewable energy innovation park; and
- The Offshore Wind Delivery Taskforce (OWDT) to publish key actions for 2024.

The CAP 2024 states, *inter alia*, that *"Transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation…".* It notes that offshore electricity generation sector is now operating at a very low level in Ireland, but there are very significant opportunities to operate at scale. The DECC commits to updating the plan every 12 months in a manner that is underpinned by consultation with key stakeholders. Updates to the plan will be informed, *inter alia*, by corrective actions that may be needed to stay on track toward the overall 2030 targets and the ultimate objective of achieving a transition to a competitive, low-carbon, climate-resilient, and environmentally sustainable society and economy by 2050.

The Project directly addresses the overarching goals of the CAP 2024 and assists in delivering the new offshore renewable energy production.

7.2.7 Programme for Government – Our Shared Future

The Programme for Government adopted in June 2020 outlines plans to implement climate adaptation measures to ensure that the state addresses the causes and effects of climate change. These measures will additionally build upon the NPF. The Programme for Government includes plans to achieve 5 GW capacity in offshore wind by 2030 off Ireland's eastern and southern coasts. As part of this, Ireland is committed to achieving a 7% annual average reduction in greenhouse gas emissions between 2021 and 2030 and achieve net zero emissions by the year 2050.

The Project directly addresses the objectives of the Programme for Government through increasing offshore renewable energy generation, reducing the use of fossil fuel and thereby reducing the impacts of climate change.

7.2.8 Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System

The DECC developed a framework and associated policy for Ireland's future offshore electricity transmission system, which was approved by Government on 14 April 2021. The framework provided clarity for all stakeholders regarding the future development, operation and ownership of Ireland's offshore electricity grid, ahead of the first of three scheduled offshore wind-specific RESS auctions that will enable Ireland to meet the 5GW target by the end of this decade.

The new framework provides for a phased transition from a decentralised offshore transmission system model to a centralised model over the course of this decade, with ownership of offshore transmission system assets to be assigned to EirGrid, Ireland's existing electricity Transmission System Operator.

While the Project was not successful in the first offshore RESS auction, it is proposed to be brought to market under a separate process such that it can help deliver Ireland's binding targets. As such the Project accords with the general principles of the Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System in so far as they are relevant.

7.2.9 Accelerating Ireland's Offshore Energy Programme Policy Statement

In March 2023 the Irish Government published *"Accelerating Ireland's Offshore Energy Programme – Policy Statement on the Framework for Phase Two Offshore Wind"*. The Policy Statement was published in response to the war between Russia and Ukraine to steer Ireland's reliance away from fossil fuels. In order to signal Ireland's increased ambition, it states that we will target the provision of at least 5 GW of grid connected offshore wind to be delivered by 2030. Key points of the policy that are relevant to the project include:

It aims to secure development of the largest possible proportion of the Government's objective to connect 5 GW of offshore wind to the onshore grid by 2030.

It states that *"unsuccessful ORESS 1 participants will be afforded a time-limited opportunity to secure an alternative route to market via a Corporate Power Purchase Agreement (CPPA) before expiration of Grid Connection Assessments (GCAs) provided by EirGrid"*. In this respect it is noted the power generated by the Project will be delivered to the National Grid at the onshore connection point and will be available for use by

all consumers connected to the National Grid. The project may enter a CPPA with a large energy user to support the delivery of the project, which does not involve the direct delivery of power to the user, as allowed for in the Maritime Area Consent.

A CPPA is a long-term financial contract, generally over several years, between a business, usually a large energy user, and a renewable generator such as a wind farm. This provides the generator with the stability and revenue certainty required to finance the construction of the wind farm. Under a typical CPPA in Ireland the wind farm sells its electricity on the wholesale market like any other generator. That power is bought, as normal, by electricity retailers or suppliers who sell it on to domestic and business consumers. This is known as a Contract for Difference or CfD. Effectively, it works much the same as a contract under ORESS but with the large energy user stepping in for the State.

7.2.10 Grid Connection Pathway for Phase 1 Offshore Wind (Merchant projects)

The Commission for Regulation of Utilities (CRU) published decision CRU2023156, Grid Connection Pathway for Phase 1 Offshore Wind (Merchant projects), which designates Phase 1 Offshore Wind projects that do not hold an ORESS1 notice of award as 'Merchant Phase 1 projects'. In this decision the CRU considered that the Merchant Phase 1 offshore wind projects are well progressed in relation to their development, ability to connect to the grid, and contribution to Ireland's 2030 targets as these projects have received a Grid Connection Assessment, a Maritime Area Consent and are in a position to seek development permission from An Bord Pleanála. In reaching this decision, the CRU also considered the following:

- New offshore generator connections increase the amount of electricity that can be generated to meet and exceed the demand for electricity. Hence, its connections support security and reliability of supply;
- Increasing electricity generated from renewable sources such as offshore wind reduces the carbon-intensity of the energy sector;
- The connection of new offshore wind generation increases competition. This puts downward pressure on wholesale prices, one of the main components of a consumer's bill; and
- Generators initially fund the local costs of connecting to the grid network, reducing the cost risk to consumers through network charges.

The CRU concluded that providing a pathway for 'Merchant Phase 1' offshore wind projects to connect to the grid should help meet the Government's 2030 target and it should benefit energy consumers in terms of increased renewable projects which should facilitate lower electricity costs. In addition, the CRU considers the obligations of the European's Union's Clean Energy Package, which requires member states to provide objective, transparent, and non-discriminatory terms, and conditions for connecting new producers.

7.2.11 Renewable Electricity Corporate Power Purchase Agreements Roadmap

Government policy in relation to CPPAs is outlined in the "Renewable Electricity Corporate Power Purchase Agreements Roadmap'' which was published in March 2022. It notes that to support the cost-effective delivery of the renewable electricity target, the Climate Action Plan 2019 included a target of 15% of electricity demand to be delivered by renewable energy CPPAs. This roadmap highlights that Ireland's electricity demand is forecast to grow by up to 50% over the next decade, largely driven by large energy users and data centre demand. This represents a challenge to Ireland's emissions reduction and renewable energy targets.

The roadmap states that *"the overall policy objective should be to harness additional private sector investment in renewable energy technologies while minimising the cost of electricity to consumers and supporting greenhouse gas reductions across sectors. A fundamental policy requirement shall be that policies to support the uptake of CPPAs should not increase the cost burden on the average electricity consumer"*. In this respect it is noted that as the power generated by the Project will be delivered to the National Grid at the onshore connection point and will be available for use by all consumers connected to the National Grid. The Project is in line with this policy.

7.2.12 Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy

The *Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy* published in July 2022 sets out national policy for the development of data centres. The statement recognises the fundamental importance of data centres.

The *Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy* clearly identifies the potential for large scale energy consumers to underpin the accelerated development of offshore wind generation, noting, "*demand for renewable electricity can help unlock offshore wind opportunities*".

As the subject project was not successful in this first ORESS auction, the Project can be realised under a Merchant Route to market as provided for in the MAC and Commission for Regulation of Utilities Decision, CRU 2023156, Grid Connection Pathway for Phase 1 Offshore Wind (Merchant projects).

In a merchant route to market the power generated by the project will be delivered to the National Grid at the onshore connection point, traded in the wholesale electricity market and will be available for use by all consumers connected to the National Grid. The Project may enter a Corporate Power Purchase Agreement (CPPA) with a large energy user to support the delivery of the project with a price support mechanism much like the subsidy support provided under the ORESS scheme.

As an offshore facility the Project cannot be co-located with a data centre. The Project would provide additional power to the national grid and make efficient use of existing grid infrastructure.

7.2.13 Other Relevant National Policy Documents

Table 7-2 sets out a commentary and details in relation to other relevant national policy documents.

Table 7-2: Other Relevant National Policy Documents.

Policy Document	Year Published	Prepared By	Key Policy Content	Relevance to the Project
Powering Prosperity: Ireland/s Offshore Wind Industrial Strategy	March 2024	Department of Enterprise, Trade and Employment	The Strategy sets out how Ireland can maximise the economic opportunity arising from the production of offshore wind by creating a solid domestic supply chain and resilient offshore renewable energy (ORE) industry. It includes measures to develop supply chain capacity and measures to develop both indigenous and export demand for energy derived from offshore wind energy. An integrated spatial and economic framework for the development of clusters of economic activity in locations critical to the development of the offshore wind sector.	There are economic benefits arising from the Project. The realisation of the project requires a supply chain and a skilled labour force. It will create a cluster of economic activity during both the construction, operation and decommissioning phases.
Offshore Renewable Energy Plan II (OREDP), 2023	2023 (Draft)	Department of the Environment, Climate and Communications	The key objectives for the Draft OREDP II are to: Assess the resource potential for ORE in Ireland's maritime area; Provide an evidence base to facilitate the future identification of Broad Areas most suitable for the sustainable deployment of ORE in Ireland's maritime area; and • Identify critical gaps in marine data or knowledge and recommend prioritised actions to close these gaps.	The project is located at a location identified in the OREDP as having "Technical Opportunities" for offshore wind. The Project is being brought forward in accordance with current consenting process.
Review of National Ports Policy 2013 – Issues Paper	2023	Department of Transport	The National Ports Policy provides the overarching policy framework for the governance and future development of Ireland's state port network. It recognises that renewable energy is integral to achieving Ireland's climate change	The Project will help to achieve Ireland's climate change ambitions. Also, it may avail of the existing smaller ports for operation and maintenance. In so doing

Policy Document	Year Published	Prepared By	Key Policy Content	Relevance to the Project
			ambitions with a target of 5 GW of offshore wind by 2030. It notes that several smaller ports will be required for operation and maintenance activities and that a number of ports and private entities are already progressing plans to provide the facilities and infrastructure required to assist the offshore wind energy sector to develop in Ireland.	it will allow Irish ports to develop new revenue streams which will contribute to regional development and local employment in the region.
Energy Security in Ireland to 2030	2023	Department of the Environment, Climate and Communications	Energy security policy in Ireland is defined by three policy objectives: sustainability, affordability, and security. Plans for the electricity system, focus on the addition of renewable generation.	As the Project will deliver additional renewable electricity generation in Ireland, it will increase our energy security.
National Energy Security Framework	2023	Department of the Environment, Climate and Communications	Provides an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine with a key action being a reduction in our dependency on imported fossil fuels, in the context of the phasing out of Russian energy imports across the EU.	The Project will deliver additional electricity generation in Ireland and in so doing, it will increase our energy security levels and our energy independence.
National Policy Statement on Electricity Interconnection	2023	Department of the Environment, Climate and Communications	This policy commits to increasing Ireland's interconnection capacity by 2030.	The Project will deliver additional electricity generation and connections in the Irish Sea and close to Northern Ireland.
National Energy and Climate Plan 2021-2030 (NECP)	2020	Department of the Environment, Climate and Communications	The NECP takes into account energy and climate policies developed to date, the National Mitigation Plan, the levels of demographic and economic growth identified in the NPF and all climate and energy measures set out in the NDP. It identifies how Ireland will achieve its 2030 targets for greenhouse gas emissions in a manner consistent with a trajectory to achieve net zero emissions by 2050.	The Project will deliver renewable energy, supporting the reduced use of fossil fuels and Ireland's 2030 targets for greenhouse gas emissions in a manner that is consistent with the trajectory to achieve net zero emissions by 2050.
Marine Planning Policy Statement	2019	Department of Housing, Local Government and Heritage	The Marine Planning Policy Statement sets out a vision for the development of a fully integrated Marine Planning System, based on three coherent building blocks of forward planning, development management and enforcement. It identifies how Ireland will achieve its 2030 targets for greenhouse gas emissions in a manner consistent with a trajectory to achieve net zero emissions by 2050.	The project is being brought forward in the context of and in accordance with the recently established marine planning system. The project will help Ireland to achieve its 2030 greenhouse gas emissions and its 2050 net zero emissions target.
Offshore Renewable Energy Plan (OREDP), Interim Review 2018	2018	Department of the Environment, Climate and Communications	It identifies the opportunity for the sustainable development of Ireland's abundant offshore renewable energy resources. It sets out clear key principles, policy actions and enablers for the delivery of Ireland's significant potential in offshore renewable energy. Action 10 of the OREDP recommends the support of early mover projects to stimulate the supply chain and act as clear signals that Ireland is open for business for leveraging support from the Marine Development Team.	The Project is an 'early mover project' as it has been in preparation since 2001. The Project can help enable Ireland's offshore renewable energy targets and can help to stimulate Ireland's offshore wind supply chain.

Policy Document	Year Published	Prepared By	Key Policy Content	Relevance to the Project
Ireland's Transition to a Low Carbon Energy Future 2015-2030 (Government White Paper on Energy)	2015	Department of the Environment, Climate and Communications	This White Paper on energy policy sets out a framework to guide policy up to 2030. It sets out a framework for transforming Ireland's fossil fuel-based energy sector into a clean, low carbon system by 2050. It recognises that Ireland's seas offer significant potential for offshore wind.	The Project will deliver renewable energy, through offshore wind energy production, supporting the reduced use of fossil fuels and the net zero emission target.
Harnessing Our Ocean Wealth – An Integrated Marine Plan for Ireland (HOOW)	2012	Department of Agriculture, Food and the Marine	HOOW was Ireland's first Integrated Marine Plan. It sets out a roadmap for the Government's vision, high-level goals and integrated actions across policy, governance and business to enable our marine potential to be realised. HOOW targets doubling the value of our ocean wealth to 2.4% of Gross Domestic Product (GDP) by 2030. It calls for publication of OREDP and an overarching National Marine Spatial Plan.	The Project will develop our marine potential and contribute directly to our GDP by 2030.
Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure	2012	Government of Ireland	Addresses public concerns about the impact that new transmission lines (mainly overhead lines) and other energy infrastructure can have on the landscape, the environment and on local communities.	The Project ties in with existing transmission lines to the east of Ardee and has been designed such that the majority of the cable route is underground with only a very minor loop into the existing 220kV overhead line being required.

7.3 Relevant National Planning Guidance

In this section, key national planning guidance is set out. In addition, Table 7-3 lists the other relevant national planning guidance documents that are applicable to the Project and provides a brief comment on the relevance of each guideline.

7.3.1 Wind Energy Planning Guidelines 2006 and associated draft revisions

The *Wind Energy Planning Guidelines 2006* and all associated draft approaches to revisions of same (Wind Energy Guidelines) sets out national guidance primarily for onshore wind farms as opposed to offshore wind farms. Specifically, most recent 2019 draft states that, *"these guidelines relate solely to land use and environmental issues related to on-shore wind energy and do not deal with issues concerning purchasing agreements, matters relating to grid capacity or off-shore wind energy".* Nevertheless, they contain some guidance on associated development including the onshore control building and the associated compound which is a useful guidance for both the substation and the grid related infrastructure associated with the Project.

Section 6.11 of the Wind Energy Guidelines states that associated infrastructure should be considered, located and design to respect the character of the surrounding landscape. Specifically, in relation to the substation, Section 6.11.1 and Section 6.11.2 of the Guidelines state that:

"A high standard design should be applied to all structures associated with the substation, and should not only take account of its function but also of its aesthetic quality, in order to minimise any sense of intrusion.

The development should incorporate colour harmony and adequate screening of the control building and substation compound. Should the surrounding landscape include trees and/or shrubs, such material can be used for screening. In sensitive landscapes, consideration should be given to screening the control buildings and compound by earth berms as well as re-sodding with local vegetation in order to mitigate their visual impact.

The control building, where practicable, should be located in a dip or a hollow but away from ecologically sensitive areas or features. In the case of coastal locations, it should not be located on promontories, unless comprising a special design appropriate to the setting.

Control buildings should be designed to respect the character of buildings typically found in the surrounding landscape.

Fencing should be limited to the substation compound area".

In relation to connection to electricity providers, Section 6.11.3 states that:

"Power line connections between turbines and from turbines to the control building should be underground".

The proposed onshore cable associated with the Project is underground and the onshore substation control building has been designed to a high standard to minimise impacts on the landscape. An assessment of the impacts of the onshore substation on landscape and visual amenity is provided in chapter 27: Seascape, Landscape and Visual Amenity (volume 2C). The site for the substation is located in an agricultural field and is not located in any landscape or ecologically sensitive area. The colour treatment to the elevations of the substation building assists in blending the new feature into its surroundings. Therefore, the onshore components of the Project comply with the above relevant sections of the Wind Energy Guidelines.

Table 7-3: Other relevant Planning Guidance Documents.

Guidance document	Year published	Comments	Response to Project
Guidelines on the information to be contained in Environmental Impact Assessment Reports	2022	The Guidelines were made available in draft format following the transposition deadline of 16 May 2017 set down in Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The Guidelines have been updated following the introduction of transposing legislation and are now formally adopted and published by the Environmental Protection Agency.	These Guidelines provide information that is useful in the preparation of EIARs undertaken in the State and has been consulted by the authors of this EIAR in the preparation of various chapters.
Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment	2018	The Guidelines, published in 2018, replace previous Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA published in 2013. They aim to ensure compliance with the highest international standards in relation to taking environmental factors into account when determining development proposals and ensuring that environmental considerations are fully addressed as part of the planning process, as well as properly managed thereafter.	Though prepared for the guidance of planning authorities and the Board the Guidelines provide information that is useful in the preparation of EIARs. The guidelines have been consulted by the authors of the EIAR for this project in the preparation of the various chapters.
The Planning System and Flood Risk Management Guidelines for Planning Authorities (FRM Guidelines)	2009	The FRM Guidelines introduced *"comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process"* (page iv); The FRM Guidelines were prepared by the Office of Public Works (OPW) in partnership with the then Department of Environment, Heritage and Local Government. They develop indicative flood maps and catchment-based Flood Risk Management Plans (FRMPs) in partnership with planning authorities, the EPA and other relevant departments and bodies. At a local level, the FRM Guidelines highlight that when applying for planning permission, applicants and their agents are required to: *"Carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding, on specific sites and*	Flood risks have been fully considered throughout the design process and a flood risk assessment (FRA) (see appendix 22-1: Flood Risk Assessment in volume 2C) has been prepared. The Flood Risk Assessment finds that the proposed 220 kV onshore substation site is not prone to any significant risk of flooding. The proposed substation site lies outside the Flood Zone C as defined by the guidance document to Planning Authorities in relation to Flood Risk Management.

Guidance document	Year published	Comments	Response to Project
		declaring any known flood history in the planning application form as required under the Planning and Development Regulations 2006"; *"Engage with planning authorities at an early stage, utilising the arrangements for pre-planning application consultation with regard to any flood risk assessment issues that may arise"*; and *"Carry out a site-specific flood risk assessment, as appropriate, and comply with the terms and conditions of any grant of planning permission with regard to the minimisation of flood risk"*.	

7.4 Relevant Planning Policy in Northern Ireland

7.4.1 Marine Plan for Northern Ireland

The Marine Plan for Northern Ireland (NI Marine Plan) informs and guides the regulation, management, use and protection of the marine area for the region. The following objectives from the marine plan are relevant to the development proposal:

"Objective 1: To promote the sustainable development of productive activities, which support employment at all skill levels while fully considering the requirements of other marine interests.

Objective 2: To help realise the potential of energy resources and energy storage within the marine area, while fully considering the requirements of other marine interests.

Objective 3: To promote the development of vibrant, accessible and sustainable coastal communities.

Objective 7: To contribute towards climate change mitigation and adaptation measures."

The Project supports employment potential in Northern Ireland at the construction and operation phases. The operation of the Project will contribute to addressing the climate change crisis from the reduction of fossil fuels by increasing the supply of alternative renewable energy infrastructure. As such, the Project at this location aligns with Objectives 1, 2, 3 and 7 from the NI Marine Plan.

7.4.2 Strategic Planning Policy Statement for Northern Ireland

The Strategic Planning Policy Statement for Northern Ireland – Planning for Sustainable Development (SPPS), published in 2015, sets out the Department's regional planning policies for securing the orderly and consistent development of land in Northern Ireland. One of the aims of the SPPS is to in relation to coastal development and is to *"protect the undeveloped coast from inappropriate development, consistent with the RDS; and to support the sensitive enhancement and regeneration of the developed coast largely within coastal settlements"*. The following regional strategic objectives that are contained in the SPPS are relevant to the Project:

Coastal Development:

"Conserve the natural character and landscape of the undeveloped coast and to protect it from excessive, inappropriate or obtrusive development."

Economic Development, Industry and Commerce:

"Promote sustainable economic development in an environmentally sensitive manner."

Renewable Energy:

"Ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed;

Ensure adequate protection of the region's built, natural, and cultural heritage features; and

Facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar Design".

While the Project is not located within Northern Ireland, the proposed offshore wind turbines will be located approximately 8.6 km offshore from Cranfield Point in Northern Ireland. Despite being visible from Northern Ireland, the EIAR has found that the Project will not have a significant effect on the environment of Northern Ireland i.e. it will not have a significant adverse effects on the seascape, landscape and the visual amenity or the natural and cultural heritage features of any area within Northern Ireland. The predicted impacts arising from the Project are fully considered in the EIAR.

7.5 Relevant Regional Planning and Development Policy

7.5.1 Regional Spatial and Economic Strategy – Eastern and Midlands Regional Assembly

The *Regional Spatial and Economic Strategy* (RSES) *for the Eastern and Midlands Regional Assembly* (EMRA) was published in June 2019. The RSES is a strategic plan and investment framework to shape the future development of the region to 2031 and beyond. The EMRA includes Co. Louth in addition to eight other counties. Prepared in accordance with the NPF, the RSES sets the context for each local authority within the region to develop county and city development plans in a manner that will ensure national, regional and local plans align.

The RSES for EMRA promotes decarbonising the energy sector and generating electricity from indigenous renewable sources including offshore wind. Regional Policy Objective 10.24 of the RSES for EMRA is to:

"Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements."

The RSES for EMRA also identifies the importance of enabling infrastructure. Section 5 of the RSES states that the *"development of the energy distribution and transmission network in the Region will enable distribution of more renewable sources of energy to facilitate future energy demand in strategic development areas…".*

The RSES supports the development of new transmission infrastructure projects, including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process. It states that Local Authority development plans shall facilitate the provision of energy networks in principle based on the following guiding principles and considerations, with which the subject proposal accords, including:

"The route proposed has been identified with due consideration for social, environmental /and cultural impacts…

The design is such that it will achieve the least environmental impact.

Where impacts are inevitable, mitigation features have been included.

Corridors for energy transmission or pipelines should avoid creating sterile lands proximate to key public transport corridors, particularly rail routes, and in built up areas.

Regard for any National or Regional Landscape / Seascape Character Assessment."

It is submitted that the Project is wholly in accordance with the principles of sustainable development as set out in the RSES and is wholly consistent with regional infrastructure policy and objectives which are to be translated into the local level of the planning policy hierarchy. More specifically the Project directly delivers increased offshore energy production and much of the necessary supporting infrastructure. The construction design of the Project as detailed chapter 5: Project Description is cognisant of social, environmental and cultural impact, impacts on transport corridors, pipelines and the landscape and seascape. Mitigation measures, where considered necessary are also set out in volumes 2B and 2C of the EIAR.

7.6 Local Planning and Development Policy Context

7.6.1 Louth County Development Plan 2021-2027

The *Louth County Development Plan 2021-2027* (the Development Plan) was adopted by members of Louth County Council in September 2021. The Development Plan sets out local planning policy objectives that are pertinent to project. The following sub-sections consider Development Plan policies that are relevant to the project.

7.6.1.1 Electricity Transmission Grid Related Infrastructure

The Development Plan contains support for electricity transmission grid related infrastructure. Specifically, Section 10.10.2 notes that *"The Council supports the development of a safe, secure and reliable supply of electricity and the development of all-island energy enhanced electricity networks to serve the existing and future needs of the Region and to strengthen infrastructure and interconnection capacity"*.

Having regard to the fact that the proposed onshore cable route is underground, it is noted that the nature of this proposal aligns with the Development Plan Policy Objective UI 80 which states that *"proposed high voltage overhead lines shall as far as possible seek to avoid areas of sensitivity. Where avoidance is not possible, full consideration shall be given to undergrounding the lines where technically feasible, and environmentally appropriate"*.

The Development Plan also sets out specific energy policy objectives, notably:

"IU 78: To support and facilitate the reinforcement and development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County and Region. This will include the delivery of the necessary integration of transmission network requirements facilitating linkages of renewable energy proposals to the electricity and gas transmission grid, in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.

IU 79: To support statutory and other providers of national grid infrastructure by protecting strategic route corridors from encroachment by development that might compromise the provision of energy networks.

IU 83: To support EirGrid's Implementation Plan (2017-2022) and the Transmission Development Plan (2016) and any subsequent plans prepared during the lifetime of this Plan, subject to appropriate environmental assessment and the planning process."

These infrastructure policies in the Development Plan endorse the improvement of grid related infrastructure and support the Project which will provide new cables, substations and linkages with the existing national grid. In addition, the Project ties in with the existing grid and does not prejudice the future development of the grid as set out in EirGrid's *Grid Implementation Plan 2023 – 2028* (currently in Draft form) and EirGrid's *Transmission Development Plan 2023 – 2032* (current in Draft form).

7.6.1.2 Renewable Energy

The Development Plan contains numerous statements that demonstrate the Council's support for renewable energy and states unequivocally, *"Louth has a clear part to play in the development of renewable energy and the provision of such alternative energy resources will be considered on suitable sites throughout the county".*

Section 10.5.2.2 of the Development Plan provides guidance and policy on energy including the following policy objectives:

"IU 49: To support international, national and county initiatives for limiting and reducing emissions of greenhouse gases through energy efficiency and the development of renewable energy sources at suitable locations, utilising the natural resources of the County, in an environmentally acceptable manner subject to normal proper planning considerations including in particular the impact on areas of environmental or landscape sensitivity.

IU 50: To co-operate with the appropriate authorities both north and south of the border in the provision of all-island renewable energy.

IU 53: To promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 10.1, to prohibit such infrastructure in areas identified as 'no-go areas' and to consider,

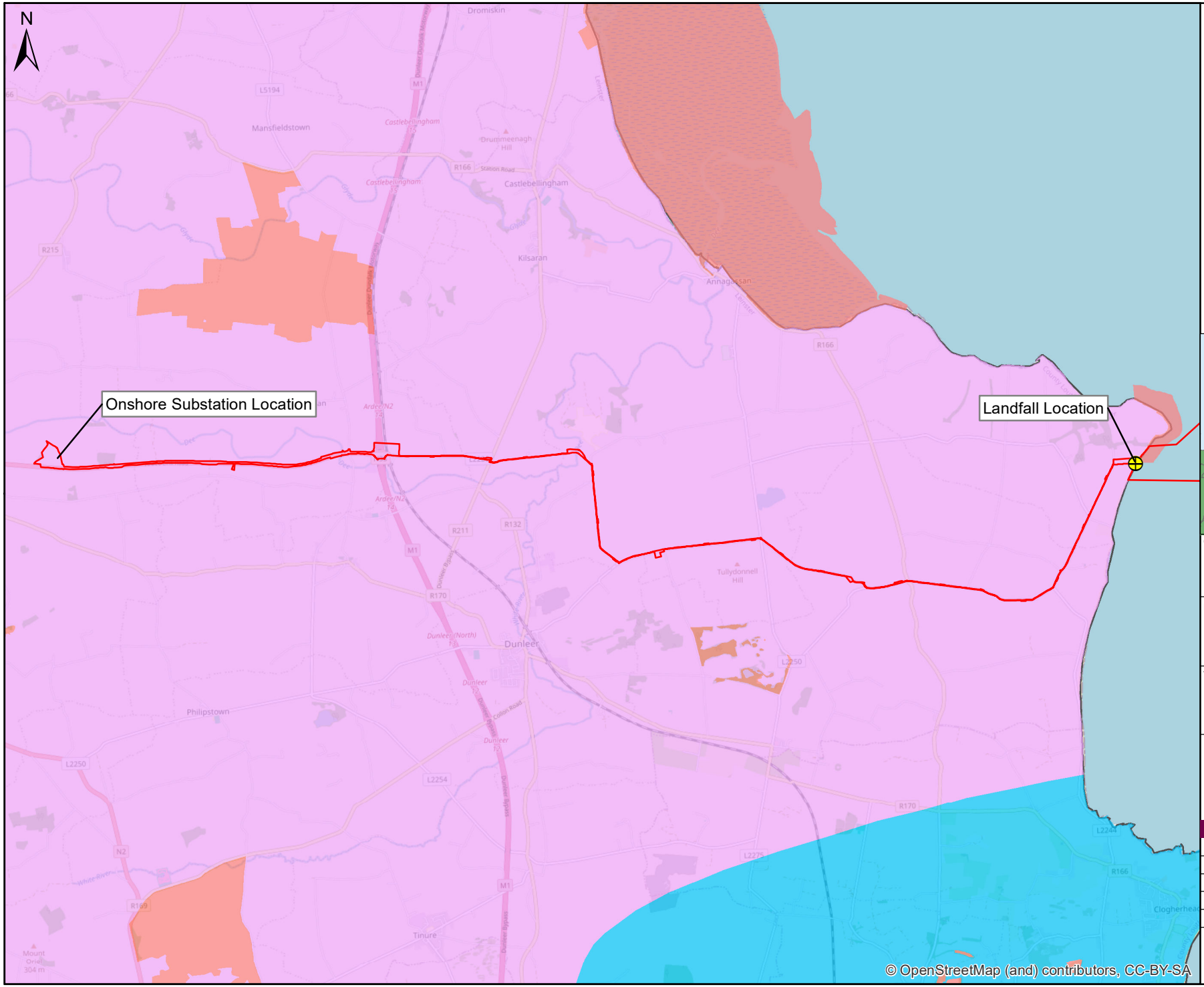
subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

IU 55: To support the implementation of the EU Green Deal, Climate Action Plan 2019 (or any subsequent plan), Programme for Government 2020, Climate Change Adaptation Strategy for County Louth and the Climate Action Charter and facilitate measures which seek to reduce emissions of greenhouse gases."

The Project will reduce emissions of greenhouse gases (see chapter 17: Climate (volume 2C). The design of the offshore infrastructure has considered the environmental and landscape sensitivity (see EIAR chapter 4: Consideration of Alternatives (volume 2A).

Regarding IU53, as illustrated in Figure 7-3, the route of the onshore cable and the substation site avoids 'no-go areas' except at the landfall location where a short section of the offshore cable will traverse the proposed NHA at Dunany. However, this will be a temporary impact and the lands will be reinstated to ensure no permanent impact on the ecology features of this site (see chapter 19: Onshore Biodiversity). Furthermore, consultation has been undertaken with the GSI as this feature is also a County Geological Site (CGS) (see chapter 21: Soils, Geology and Hydrogeology) and measures have been included to minimise impacts on the CGS.

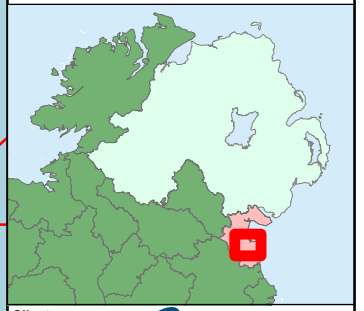
It is noted that the Project concerns wind generating infrastructure onshore that is proposed to be located in *"preferred areas"* only. In addition, the Project complies with the Development Plan policies in so far as it concerns renewable energy related enabling infrastructure that is considerate of the landscape and setting.



Legend

- Planning Application Boundary
- Landfall Location
- No Go Areas
- Preferred Areas
- Open to Consideration

Data Sources: OWL, Louth County Council
Based on Map 10.1, Louth County Development Plan 2021-2027



Client
ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project
Oriel Wind Farm Project

Title
Figure 7-3:
Areas suitable for Wind Development

RPS
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Issue Details

Drawn By: NR	**Project No.** MDR1520b
Checked By: MH	**File Ref:** MDR1520bArc3111F02
Approved By: CC	
Scale: 1:80,000 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 26/02/2024	

7.6.1.2.1 Offshore Wind Energy

Section 10.6.1 of the Development Plan provides specific guidance and policy objectives on offshore wind energy, notably:

"IU 56: To encourage the development of wind energy, in accordance with Government policy and guidance and the 'Wind Energy Development Guidelines' (2006) or any revisions thereof which may be issued during the lifetime of the Plan.

IU 57: To facilitate the development of wind energy in an environmentally sustainable manner ensuring proposals are consistent with the landscape preservation objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.

IU 58: To promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 10.1, to prohibit such infrastructure in areas identified as 'no-go areas' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

IU 60: To support the development of offshore windfarm developments subject to normal planning considerations, including in particular the impact on areas of environmental or landscape sensitivity."

The Project is in accordance with European and national government policy and guidance in relation to wind energy as considered in Sections 7.2 – 7.4 of this report. The environmental impacts of the Project including in relation to landscape preservation and the protection of the natural and built environment and the visual and residential amenities have been fully considered as reported in the enclosed EIAR. While the proposed WTGs and offshore / inter array cables will be located in the marine area, it's associated onshore infrastructure is located in the 'preferred areas' as outlined in map 10.1 of the Development Plan.

Moreover, the Project directly accords with the overarching objective of European and national policy documents to deliver renewable energy. By its very nature, it can enable the delivery of the following policy objectives:

"ENV 4: To support the goals and objectives of the EU Green Deal, the Climate Action Plan 2019 and the Climate Action Charter in ensuring sustainable development across the County.

ENV 48: To implement the policies and objectives as set out within the National Maritime Spatial Plan to support the effective management of marine activities and more sustainable use of our marine resources.

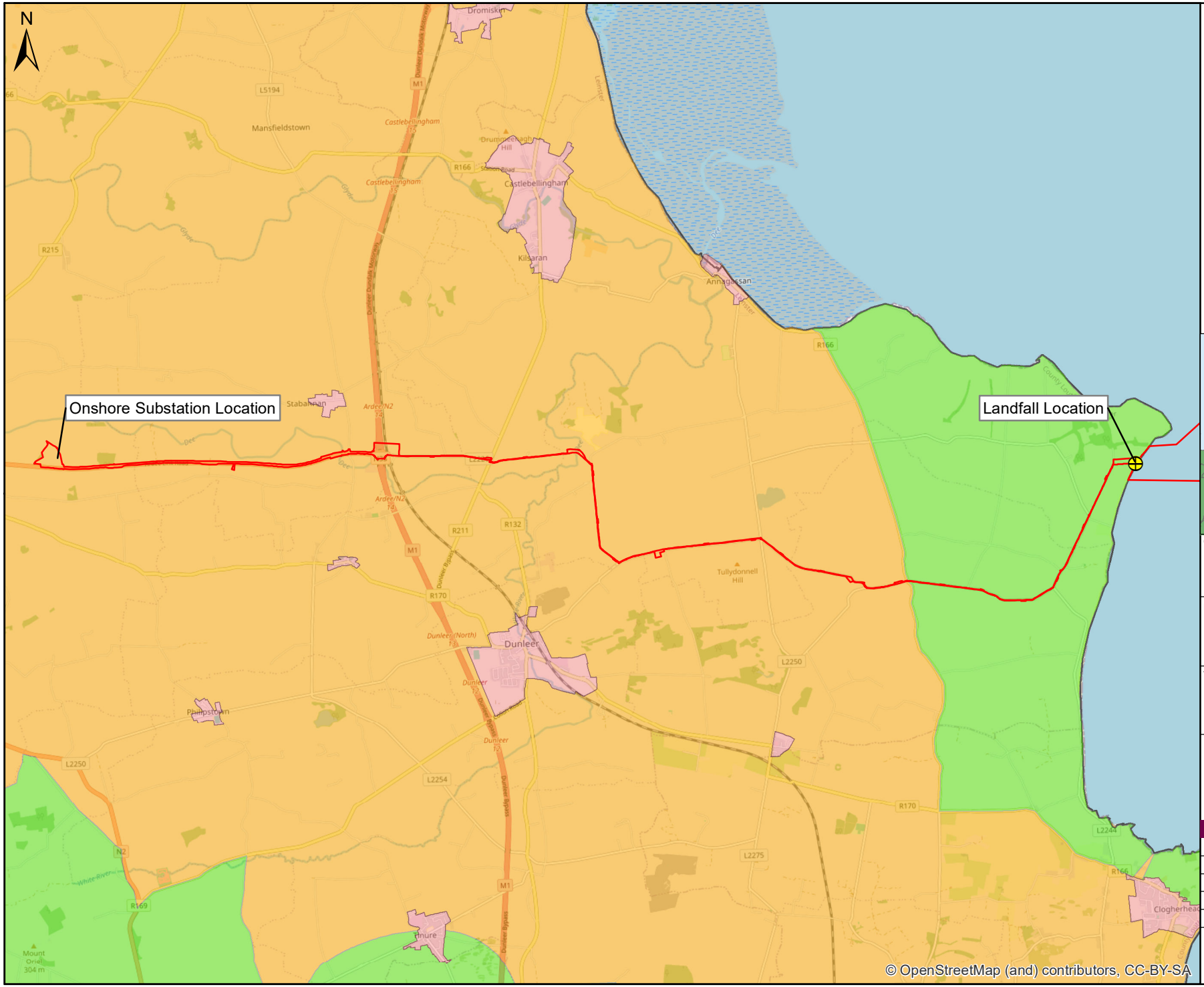
ENV 49: To support and accommodate any change to the marine spatial planning system which is proposed under the Marine Planning and Development Management Bill 2019 (or any subsequent Bill) once enacted into law."

The consistency of the Project with the national policies and all relevant planning consent legislation, including the NMPF is considered in Sections 7.3 of this report.

7.6.1.3 Rural Policy Zones

The onshore elements of the Project are located entirely within rural policy zones and do not concern any settlement boundaries. Figure 7-4 illustrates the location of the Project having regard to Map 3.2 Rural Policy Zone Map of the Development Plan. It is evident that the proposed onshore substation site and the majority of the underground onshore cable route primarily concerns 'Rural Policy Zone 2', with the description "*area under strong urban influence*". Both the remainder of the onshore cable route and the landfall, all of which are proposed to be located underground are located within 'Rural Policy Zone 1' with the description "*area under strong urban influence and of significant landscape value*". The only specific land use objectives in relation to Rural Policy Zones 1 and 2 are concerning rural housing in the open countryside.

As the Project underground infrastructure, onshore for all elements of the Project are located in Zone 1, it does not interfere with the landscape value of this rural policy zone. Also, as the only above ground onshore elements of the Project concern Zone 2, it accords with this rural policy zone.



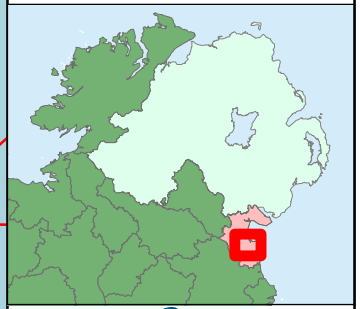
Legend

- Planning Application Boundary
- Landfall Location
- Settlements

Rural Policy 2021-2027

- Rural Policy Zone 1 - Area under strong urban influence and of significant landscape value
- Rural Policy Zone 2 - Area under strong urban influence

Data Sources: OWL, Louth County Council
Based on Map 3.2 Rural Zone Map [extract], Louth CDP



Client
ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

Figure 7-4:
Extract from Land Use Zoning Objectives Map in Development Plan

RPS
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Issue Details

Drawn By: NR	**Project No.** MDR1520b
Checked By: MH	**File Ref:** MDR1520bArc3112F02
Approved By: CC	
Scale: 1:80,000 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 26/02/2024	

7.6.1.4 Onshore Archaeological Considerations

The Development Plan has the following policy relevant to the proposed development *"BHC 10: To require, as part of the development management process, archaeological impact assessments, geophysical surveys, test excavations and monitoring, as appropriate, where development proposals involve ground clearance of more than half a hectare or for linear developments over one kilometre in length or for developments in proximity to areas with a density of known archaeological monuments and history of discovery, as identified by a licensed archaeologist".* In this specific respect it is noted that:

A geophysical survey and test excavation was carried out in areas in proximity or in the immediate vicinity of a recorded monument or a Zone of Archaeological Potential. This was carried out under licence to the DHLGH. Section 1.7 from 'appendix 26-1: Cultural Heritage Technical Report' (volume 2C) in the accompanying EIAR includes a list of undesignated cultural heritage sites and areas of archaeological potential identified in the immediate vicinity of the onshore cable route.

Chapter 26: Cultural Heritage (volume 2C) of the EIAR concluded that there is no potential significant effects on cultural heritage sites.

With the incorporation of the measures included in the Project, and mitigation measures for: the protection of unidentified subsurface archaeological sites; the protection of subsurface archaeological features, soils or finds; the protection of known archaeological features; the protection of subsurface isolated remains/features; the protection of archaeological features identified within the footprint of the onshore substation site and the protection of greenfield archaeological potential; residual effects would be reduced to imperceptible and slight, which is not significant in EIA terms. No mitigation is proposed during the operational phase for setting impacts.

7.6.1.5 Marine Archaeology

Chapter 15: Marine Archaeology (volume 2B) of the accompanying EIAR concerns marine archaeology and the assessment states that there are a number of measures are included in the Project to reduce/avoid the potential for impacts on marine archaeology. These include: implementation of Archaeological Exclusion Zones to avoid known wreck sites and anomalies of unconfirmed archaeological potential that may be impacted by the Project.

7.6.1.6 Coastal Protection

Chapter 11 of the Development Plan concerns Environment, Natural Resources and the Coast and provides guidance and policy on development in coastal areas and on the foreshore. This policy is relevant to those elements of the Project that are located offshore within the nearshore area and to those onshore elements that are located near to the landfall point at the coast. The policy objective includes:

"ENV 50: To require that all Projects within 100 m of the coastline of Louth, outside the main settlements (Levels 1-4) submit a Coastal Erosion Assessment Report. New developments will be prohibited, unless it can be objectively established based on the best scientific information at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, inter alia, any impacts."

The Project accords with ENV 50 as it will not have any negative impact on the County's natural coastal defences. The Project has been subject to detailed environmental assessments as outlined in the enclosed EIAR. More specifically, the potential for coastal erosion is considered in the EIAR and a Coastal Erosion Assessment Report is included in appendix 21-1 of the EIAR (volume 2C).

The Coastal Erosion Assessment Report provided a desk study review of published information and data from project specific site investigations on coastal erosion at the landfall site of the Project, a site inspection, identification of key contributory causes of coastline slope failures, and stability and impact of proposed works. A review of the proposed landfall options included two options for the location of the transition joint bay proposed by the Project.

"ENV 52: To ensure the County's natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and to ensure they are not put at risk by inappropriate works or development."

The location of the landfall approximately 700 m south of Dunany Point has been selected. This location was selected out of a list of 15 options for the landfall location, and through a sieving process, the principle of avoiding European designations was applied and the remaining sites were considered against the other

constraints. In consideration of constraints such as population centres, dwellings, landscape designations, and technical aspects, Dunany (South) emerged as the preferred landfall site.

This is further detailed in the enclosed EIAR. The Project also accords with ENV 52 as it will not have any negative impact on the County's natural coastal defences.

"ENV 56: To protect the special character of the coast by preventing inappropriate development, particularly on the seaward side of coastal roads. New development, wherever possible, shall be accommodated within existing developed areas and be climate resilient in their design."

By its nature, the Project will require development on the shoreline. Given that the offshore wind turbines will be visible from certain areas along the coast of Co. Louth, there will be potential for impacts on the visual quality of the environment. As set out in more detail in section 7.6.1.7 below, the detailed Seascape, Landscape and Visual Impact Assessment of the Project which forms part of the EIAR examines this from a technical perspective.

"ENV 57: 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 altered patterns of erosion or deposition elsewhere along the coast."

By its nature, the Project will require development on the shoreline. The design is such that impacts on seascape, landscape and visual amenity will occur along the coastline as detailed in chapter 27: Seascape, landscape and Visual Amenity. The manner in which the Project meets with policy objectives ENV 52 and ENV 57 are addressed in detail in chapter 7: Marine Processes and chapter 27: Seascape, Landscape and Visual Amenity of the EIAR.

7.6.1.7 Visual Impact, Scenic Routes, Views and Prospects

In addition to traversing numerous 'Local Roads', the onshore elements of the Project also traverse a number of national and regional roads including the M1 motorway, the N33, one 'Protected Regional Route' (the R132) and one 'Regional Road' (the R166). As examined in detail in chapter 28: Traffic and Transport (volume 2C) of the EIAR, the Project will have no impact on the operation of these roads at the operational stage and will have imperceptible to slight effects on these roads during the construction stage.

The Development Plan sets the following policy objectives in relation energy developments and their visual impact:

"ENV 65: To resist development along the coast which would detract from its visual appearance or conflict with its recreational and leisure functions.

IU 77: To seek to avoid the sterilisation of lands proximate to key public transport corridors such as rail routes when future energy transmission routes/pipelines are being designed and provided.

IU 80: To ensure that development proposals for energy transmission and distribution infrastructure follow best practice with regard to siting and design. Proposed high voltage overhead lines shall as far as possible seek to avoid areas of sensitivity. Where avoidance is not possible, full consideration shall be given to undergrounding the lines where technically feasible, economically viable and environmentally appropriate."

In addition, the Development Plan has designated Scenic Routes which require protection and states that *"Any development proposals, which would interfere with or adversely affect these scenic routes, will not be permitted"*. Policy objective NGB 40 of the Development Plan states to *"prohibit inappropriate development which would interfere with or adversely affect the Scenic Routes as identified in Table 8.19 and illustrated on Map 8.20".* In addition, the Development Plan recognises that LCC has a number of Areas of High Scenic Quality (AHSQ), Areas of Outstanding Natural Beauty (AONB) and Views and Prospects, all of which should be protected.

The proposed onshore underground electricity transmission grid connection linking the proposed landfall in the townland of Dunany to the proposed connection point at Stickillin will generally be laid in a single trench of approximately 1 m in width and 1.4 m in depth. The substation site will be well screened from the public road. As this underground cable and the substation site will have no significant negative visual impact, it is considered to comply with ENV 65, IU 77 and IU 88. Coupled with this, a detailed Seascape, Landscape and Visual Impact Assessment of the Project has been undertaken as part of the EIAR. The assessment

establishes the baseline conditions, describes the development and identifies the impacts of the Project on all of the Scenic Routes, AHSQ, AONB and Views and Prospects.

7.6.1.8 Biodiversity

The Development Plan contains numerous policies designed to ensure the protection of biodiversity in the county. Specific policies are included to protect Natura 2000 sites (SPAs and SACs) in addition to Natural Heritage Areas (NHAs) notably:

"NBG 10: To ensure that development proposals, where relevant, improve the ecological coherence of the Natura 2000 Network of European Sites and encourage the retention and management of landscape features as per Article 10 of the Habitats Directive.

NBG 13: Development sites must be investigated for the presence of invasive species, which if present must be treated and/or eradicated in accordance with best practice. Where appropriate, Invasive Species Management Plans will be prepared for such sites.

NBG 14: To protect from inappropriate development and maintain the character, integrity and conservation value of those features or areas of ecological interest listed as pNHA or that may be designated as NHA, during the lifetime of this Plan.

NBG 15 : To ensure that any development within or adjacent to a NHA or pNHA is designed and sited to minimise its impact on the ecological value of the site and to resist development that would result in a significant deterioration of habitats or a disturbance of species."

In line with NBG 10, the Project has been designed to avoid European sites, where possible. The North-west Irish Sea SPA (announced in July 2023) designated as an important foraging resource for marine birds, intersects the offshore cable corridor. European sites have been assessed in the following EIAR chapters:

- Volume 2B, chapter 8: Benthic, subtidal and intertidal ecology;
- Volume 2B, chapter 9: Fish and Shellfish;
- Volume 2B, chapter 10: Marine Mammals and Megafauna;
- Volume 2B, chapter 11: Offshore Ornithology; and
- Volume 2C, chapter 19: Onshore Biodiversity.

The assessment undertaken in chapters 8 to 11, and chapter 19 ensures the Project aligns with this policy (NBG 10) by outlining a number of measures to avoid significant effects on European sites, and their relevant habitats and species.

Specifically in relation to the North-west Irish Sea Special Projection Area (SPA), of which the Project intersects, measures include: Timing of the works at the landfall and within the intertidal area to avoid the peak season for intertidal wintering birds to reduce any potential impact on migrating and wintering birds of the North-west Irish Sea SPA. Additionally, a Natura Impact Statement (NIS) has been prepared for the Project and accompanies the application. The NIS concludes that the Project will not result in adverse effects on the integrity of any SAC or SPA with the implementation of mitigation measures.

The Project aligns with NBG 13 as outlined in volume 2C, chapter 19: Onshore Biodiversity. Site-specific surveys were undertaken to identify, inter alia, Invasive Alien Plant Species (IAPS) and a number of measures have been proposed to reduce the risk of their introduction, and to avoid their potential impacts and spread on important ecological features. These measures include designed-in and management measures (controls).

Policies NBG 14 and NBG 15 are addressed in volume 2C, chapter 19: Onshore Biodiversity. The export cable or transition joint bay of the Project will traverse Dunany point pNHA. The potential impacts on the pNHA were assessed and a number of measures proposed to reduce the impact on the designated site. Measures include the demarcation of the ecologically sensitive area; timing of the works to avoid the peak season for intertidal birds; and the profile of the pNHA will be reinstated and vegetation will be allowed to naturally regenerate after construction. The assessment in chapter 19: Onshore Biodiversity concluded no significant effects in relation to Dunany Point pNHA.

7.6.1.9 Access, Traffic and Transportation

Having regard to the project, the Development Plan sets the following notable policies in relation to traffic, access and roadside boundaries:

"MOV 43: To protect the strategic transport function of national roads, including motorways through the implementation of the 'Spatial Planning and National Roads – Guidelines for Planning Authorities.

MOV 47: To require the preparation of Transport and Traffic Assessments for new developments in accordance with the requirements set out in the TII Traffic and Transport Assessment Guidelines.

MOV 56: To safeguard the capacity and safety of the National and Regional Road network by restricting further access onto National Primary, National Secondary, and Protected Regional Roads in accordance with the details set out in Tables 7.5 and 7.6."

The context within which the Project is set with regard to connections and accessibility and the traffic impacts are considered fully in chapter 28: Traffic and Transportation (vol. 2C) of the EIAR. The Construction Traffic Management Plan (see appendix 5-9, volume 2A) sets out the type of measures which will be adopted for Project to ensure that the sustainable transport facilities are made available and are utilised by the users of the Project. Ultimately, as the Project complies with policy MOV 43, 47 and 56 as:

- It will have no discernible impact on the strategic transport function of national roads or the M1 motorway;
- Transport and Traffic Assessments have been undertaken in accordance with the requirements set out in the TII Traffic and Transport Guidelines. This was bolstered by direct consultation which has been undertaken with TII; and
- No new access is proposed to the National or Regional Road network, and therefore, the project will safeguard the capacity and safety of the national and regional road network.

7.6.1.10 Archaeology and Heritage

Chapter 9 of the Development Plan provides guidance and policy objectives on archaeology and built heritage. The Development Plan sets the following notable policies in relation to development within the vicinity of recorded monuments or areas of special archaeological interest (including Ardee):

"BHC 1: To protect and enhance archaeological sites and monuments, underwater archaeology, and archaeological objects listed in the Record of Monuments and Places (RMP), and/or the Register of Historic Monuments and seek their preservation (i.e. presumption in favour of preservation in situ or in exceptional cases, at a minimum, preservation by record through the planning process and having regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage and the principles as set out in the 'Framework and Principles for the Protection of the Archaeological Heritage' (Department of Arts, Heritage, Gaeltacht and the Islands 1999).

BHC 3: To protect known and unknown archaeological areas, sites, monuments, structures and objects, having regard to the advice of the National Monuments Services of the Department of Housing, Local Government and Heritage.

BHC 6: To ensure any development, either above or below ground, adjacent to or in the immediate vicinity of a recorded monument or a Zone of Archaeological Potential (including formerly walled towns) shall not be detrimental to or detract from the character of the archaeological site or its setting and be sited and designed to protect the monument and its setting. Where upstanding remains exist, a visual impact assessment may be required.

BHC 10: To require, as part of the development management process, archaeological impact assessments, geophysical surveys, test excavations and/or monitoring as appropriate, where development proposals involve ground clearance of more than half a hectare or for linear developments over one kilometre in length or for developments in proximity to areas with a density of known archaeological monuments and history of discovery, as identified by a licensed archaeologist."

Chapter 26: Cultural Heritage of the EIAR considers the impacts that the Project will have on archaeology and heritage. While there are no protected structures located within the application boundary, the proposed grid connection route has been designed to travel northwards around Drumcar Bridge, the nearest Protected Structure to the site boundary to avoid any impacts.

7.6.1.11 Noise and Air Quality

Chapter 11 of the Development Plan provides guidance and standards for environmental noise and airy quality including the following policy objectives:

"ENV 3: To seek to achieve European and National standards in relation to air, noise and water quality in the County and apply BAT standard (Best Available Techniques).

ENV 6: To implement the Louth County Council Noise Action Plan 2018-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure.

ENV 7: To require that where new development is proposed within the limits of the noise maps for the designated sections of roads in the County, appropriate mitigation measures are undertaken so as to prevent harmful effects from environmental noise."

ENV 12: To promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as out in the Air Quality Standards Regulations 2011 (SI No. 180 of 2011), or any updated/superseding documents."

An airborne noise and vibration impact assessment that has regard to both the Development Plan and the Louth County Council Noise Action Plan 2018-2023 was undertaken as part of the EIAR (see chapter 25 in vol. 2C). The potential effects due to noise impacts from the Project are described in the EIAR and where significant effects have been identified, mitigation measures have been specified to ensure that residual effects will not be significant. Air quality is also fully considered in chapter 23: Air Quality of the EIAR. It has found, *inter alia,* that the impact to air quality for residential properties along these routes is classed as imperceptible.

7.6.1.12 Lighting

In the interests of nature conservation, residential amenity and energy efficiency, the County Development Plan seeks to limit light pollution, however, it equally recognises the importance of the provision of adequate lighting in the interests of safety and security. The Development Plan states that *"where proposals for new lighting require planning permission, the planning authority will ensure that they are carefully and sensitively designed so as to avoid creating glare or emitting light above the horizontal plane"*. The Development Plan sets out the following policies in relation to light pollution:

"ENV 8: To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife.

ENV 9: To require all details of on-site lighting associated with all future development are submitted to and agreed with the planning authority.

ENV 10: To promote the use of low energy LED (or equivalent) lighting in support of Climate Action.

Having regard to these policies, details of the external free standing lighting associated with the substation has been included as part of the planning application drawings. The proposed lighting has been designed in order to enable the substation to be safely operated while also preventing any light pollution. No other lighting proposals feature as part of the Project.

7.7 Conclusions in relation to Planning and Development Policy Context

There is support in all relevant policies, objectives and guidelines for the Project at the subject site as contained within the red line site boundary. European, national, regional and local policies and development plans coalesce around a number of overriding objectives. The Project is fully compliant with and aligned to these policies. In summary

Contributing to the achievement of Ireland's 2030 renewable energy targets and the 2050 net-Zero emissions targets: The Project will contribute to the achievement of meaningful progress towards Ireland's

renewable energy and emission reduction targets by 2030. While it constitutes only approximately 6.6% of the 5 GW of offshore wind energy objective of the NMPF, it nevertheless, allows for a project of scale that has been planned for some twenty years to finally be realised. It also contributes towards Ireland's 2050 net-zero emissions targets and our transition to a low-carbon and climate-resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy as underpinned by the Climate Action and Low Carbon Development (Amendment) Act 2021.

Enabling Ireland to sustainably harness its offshore renewable energy potential: The Project can enable Ireland to harness some of its offshore renewable energy potential through the provision of the necessary grid connectivity infrastructure between the offshore wind resource and a carefully chosen connection into the existing national grid.

Protecting residential and visual amenity: By design, the proposed underground transmission cable coupled with the careful design of the associated substation, enables the protection of residential and visual amenity and holistically, the project has been designed to minimise impacts on the local landscape.

Protecting the environment and enabling a sustainable rural economy and society: The Project has been designed to protect all facets of the environment including designated sites. It has also been designed*, inter alia,* to avoid any negative impacts on tourism, enable economic growth and create employment opportunities locally.

Significantly, the Project complies with all statutory planning guidelines and policies at European national, regional and local levels. In particular, the project enables Ireland to show real intent when it comes to achieving the targets set by the Revised Renewable Energy Directive and all associated national level transposition of these Directives. It will also assist in the delivery of key strategic energy objectives and land use development policies, set out in European, National, regional, and local documents, statements, policies and plans.

8 PLANNING APPRAISAL

This section of the report addresses key areas for the consideration of the Board in relation to assessing the project from the perspective of proper planning and sustainable development. These include:

1. Need for the Project;
2. Nature and scope of the proposed development;
3. Principle of the proposed development having regard to relevant planning policies;
4. Environmental Impact Assessment Report (EIAR);
5. Natura Impact Statement (NIS);
6. Flood Risk Assessment Considerations;
7. Construction Phase Considerations;
8. Transboundary State Considerations; and,
9. Community Gain.

8.1 Need for the Project

The need for the Project has been set out in section 2 of this report. Notably, the Project will play a key role in helping to achieve national and European renewable energy and decarbonisation targets through use of renewable energy sources. It is also supported by a number of national level policies including the NMPF, the NPF, Ireland's Programme for Government and Ireland's OREDP.

In summary, the reasons for which development permission should be granted for this Project arises from:

- The need to transition to create more sustainable renewable energy sources in order to address climate change both nationally and internationally;
- The need to meet the growing need for electricity as transport, heating and other sectors come to rely more heavily on electricity to meet their energy requirements; and
- The need to provide greater energy security and independence which is particularly important at present in the context of the Russian invasion of Ukraine and more generally increased instability internationally.

8.2 Nature and scope of the proposed development

The proposed development constitutes strategically important electrical infrastructure that is critical to the realisation of the harnessing of up to 375 MW of offshore wind energy. The proposed site has gone through a rigorous site and route selection process over a gestation period of some twenty years.

Throughout this long assessment process, the design and scope of the Project has continually improved such that it now has the least possible impact on all relevant social and environmental receptors. The infrastructure now proposed has been designed to minimise any adverse impacts to the subject lands in addition to the wider hinterland.

8.2.1 Project Design Flexibility as part of the Proposed Development

The Planning and Development, Maritime and Valuation (Amendment) Act 2022 (the Act of 2022), passed by the Oireachtas in July 2022, includes amendments to the Planning and Development Act 2000, as amended, concerning flexibility in respect of some of the details of the proposed development to be submitted as part of certain planning applications.

The provision of a degree of flexibility in projects such as the subject development ensure that at the detailed design and construction states the most appropriate equipment and design solutions are utilised. As such, the flexibility enhances the development and mitigates any potential negative impacts.

In this instance, the Project requires flexibility in relation to the final exact location of each offshore wind turbine and the offshore substation, the final height of the offshore infrastructure, the final route and length of the offshore export cable and offshore inter-array cables, the location and layout of the landfall TJB and the

final design for the type and siting of outdoor equipment within the proposed onshore substation compound. Please refer to section 5.3.1 of this report for further details in this respect.

This flexibility that has been sought has been discussed with ABP via the Section 287A process and APB provided their design flexibility opinion on 25 January 2024.

8.3 Principle of the proposed development

Offshore wind energy development has a critical role to play in contributing to EU and national targets for renewable energy generation. The Project is capable of delivering an MEC of 375 MW of offshore renewable electricity. The Project is wholly in accordance with overarching European and national renewable energy targets and support for increased wind energy. In particular, the *Climate Action Plan 2024* and the associated Climate Actions, the NMPF and the Programme for Government underpin the strategic need for the Oriel Wind Farm Project.

Compliance with all Relevant European, National, Regional and Local Policies

The Project has been assessed against all relevant European, national, regional and local planning policies and objectives. In each instance, there are supporting policies for the proposed subject renewable energy scheme which also constitutes electrical infrastructure that is of national importance. This is detailed in section 7 of this report.

The accompanying EIAR and the NIS demonstrate how the Project has many positive environmental effects and will not have an adverse impact on the conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of Natura 2000 sites.

Compliance with Rural Policy Zoning Objectives

The Project does not concern any settlement boundaries. In terms of rural housing policy, it priority concerns Zone 2 which is an area under strong urban influence and for any parts of the project that concern zone 1 which concerns areas of a significant landscape value, it concerns underground development in this zone so it accords with rural policy objectives zone 1 and 2 in terms of what is proposed in each of these locations. The Project is wholly consistent with the rural policy zoning objectives of the Development Plan.

8.4 Environmental Impact Assessment Report

An EIAR has been prepared in respect of the Project. The EIAR has been prepared in accordance with the requirements of the EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU), Schedule 6 of the Planning Regulations of 2001 (as amended by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018). Full details and a Non-Technical Summary are provided in volume 1 of the application documentation, however, it is noted that the Environmental Impact Assessment will be undertaken by the Board as Competent Authority.

The EIAR has also been undertaken having regard to, *inter alia*:

- The requirements of EU Directives and Irish law regarding Environmental Impact Assessment;
- European Commission Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)(European Commission, 2017);
- Department of Housing, Planning and Local Government Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment 2018;
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (Environmental Protection Agency, 2022); and
- Draft Advice Notes for Preparing Environmental Impact Statements, (EPA, 2015).

In addition, specialist disciplines have had regard to other relevant guidelines, as noted in the specific chapters of the EIAR. Survey work has been undertaken in order to provide valid baseline information on which to undertake the environmental assessments, in addition to the site-specific information from the existing databases from official sources.

The EIAR (volumes 1, 2A, 2B and 2C) enclosed with this application, provide a comprehensive account of the potential environmental impacts and any mitigation measures proposed. Each topic of environmental assessment is considered as a separate chapter and is drafted by relevant specialists.

The production of the EIAR has been co-ordinated by RPS. The EIAR structure, responsibility and qualified input for each chapter are detailed in chapter 1: Introduction (vol. 2A) of the EIAR.

8.5 Natura Impact Statement

Article 6 of the Habitats Directive provides a strict assessment procedure for any plan or project not directly connected with or necessary to the management of a designated European site, but which has the potential to have implications for the site in view of the site's conservation objectives. This application for approval includes a Natura Impact Statement (NIS) which has been prepared in accordance with the requirements of EU and Irish national law, policy and practice.

In summary, the implementation of mitigation measures detailed in section 6 of the NIS will ensure that no adverse effects on the integrity of any European sites in light of the site's conservation objectives. Based on the assessment of the proposed development alone and in combination with other projects and plans, including the implementation of mitigation measures, it has been concluded that no adverse effects on the integrity of any European sites will arise, in view of the site's conservation objectives. However, it is noted that the Appropriate Assessment will be undertaken by the Board as Competent Authority in this particular respect.

8.6 Flood Risk Assessment Considerations

Flood risks have been fully considered throughout the design process and a Flood Risk Assessment (FRA) has been prepared for the proposed onshore substation which is proposed to be located in the townland of Stickillin, east of Ardee. The FRA finds that the proposed 220 kV onshore substation site is not prone to any significant risk of flooding. The proposed substation site lies outside the Flood Zone C as defined by the guidance document to Planning Authorities in relation to Flood Risk Management. The FRA is included in appendix 22-1 of the EIAR.

8.7 Construction Phase Considerations

As set out in detail in chapter 5: Project Description (volume 2A) of the accompanying EIAR, the construction of the offshore elements of the Project involves the use of installation vessels designed for transporting and installing wind turbines, cable laying vessels used for laying and burying cables, service operating vessels (SOVs) for crews, etc., all of which are an unusual form of construction. Onshore, the laying of underground cables (UGC) is a standard construction technique undertaken by a range of utility and other services providers.

During the construction phase, on public roads, traffic control measures will be implemented as appropriate, including road diversions and stop / go traffic management. Joint bays (underground chambers) are used to pull various lengths of UGC through pre-installed ducts and to connect ("joint") together those lengths of UGC into a single overall circuit. Off-road passing bays, constructed adjacent to a joint bay, facilitate the through movement of traffic. The road will be fully reinstated following the laying of the UGC and associated infrastructure. The 220 kV substation site benefits from being located on private lands that afford excellent screening from the N33 national route.

Both the Applicant and the appointed contractor will have dedicated land and community liaison officers to provide advance notice of works to affected communities and landowners, and to address any queries or concerns arising. Overall, it is considered that such necessary temporary impact is proportionate to the provision of this Project.

8.8 Transboundary State Considerations

Given the proximity of the Project to Northern Ireland, the Applicant has consulted with the relevant government stakeholders in the United Kingdom of Great Britain and Northern Ireland and the Crown Protectorate of the Isle of Man Isle of Man, which are parties to the Transboundary Convention (the United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a

Transboundary Context, done at Espoo in Finland on 25 February 1991) regarding the Project on potential for transboundary issues. The potential for transboundary impacts has also been considered as part of each topic of the EIAR.

Ultimately, it has been established that the Project is not likely to have significant effects on the environment of another jurisdiction. More specifically, it is not likely to have significant effects on the environment of the United Kingdom of Great Britain and Northern Ireland and including the environment of the Crown Protectorate of the Isle of Man. The fact that the Project is not likely to have significant effects on the environment on any other State is stated in the statutory notices that form part of the planning particulars.

8.9 Community Gain

The Applicant fully recognises that the local and regional community should benefit from the development of the Project. Accordingly, the Applicant has established a voluntary Fisheries Fund to support local fishing businesses in initiatives that will help the long-term sustainability of shellfish stocks and the sustainable development of the fisheries industry in the region.

The Applicant commits to contribute to a community benefit scheme, which will distribute grants to qualifying groups in the region during the operation of the Project. The Applicant will continue to engage with relevant authorities, including An Bord Pleanála, the MARA and the DECC relative to the quantum, structure and administration of this scheme.

9 CONCLUSION

The Project will be a vital component in demonstrating Ireland's intent that 70% of electricity comes from renewable energy sources by 2030 including the target of achieving at least 5 GW of offshore renewable energy as pledged in the NMPF, the Climate Action Plan 2024 and the current Programme for Government. Through facilitating the connection of the Project to the national grid, the Project will assist Ireland in transitioning to a low-carbon and climate-resilient society, notably, National Strategic Outcome 8 of the NDP.

The application documentation (including where applicable the EIAR and NIS) have assessed all the planning and environmental issues that are likely to arise with a development of this nature in this location. The Applicant has engaged and responded to interested parties to address challenging issues in relation to the Project.

This Planning Report clearly demonstrates that the Project complies with all relevant statutory plans, guidelines, policies and objectives at EU, national, regional and local levels. In particular, having regard to the following:

- The policies of the National Marine Planning Framework, notably ORE Policy 1;
- The requirements of EU energy law and energy policy including the Climate Action and Low Carbon Development Act 2015, as amended;
- The Programme for Government - Our Shared Future;
- The provisions of Project Ireland 2040 - the National Planning Framework;
- National Strategic Outcome 8 of the National Development Plan 2021-2030;
- The actions set out in the Climate Action Plan 2023 and the Climate Action Plan 2024, notably 5 GW of offshore wind energy generation by 2030;
- The Wind Energy Planning Guidelines 2006 and associated draft revisions;
- The provisions of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy in respect of renewable energy and electricity infrastructure;
- The provisions of the Louth County Development Plan 2021-2027;
- The stated need for, and benefits of, the Project, including:
    - The provision of competition to the electricity market to the benefit of the Irish consumer;
    - Helping Ireland to transition to a low carbon energy future;
    - Facilitating increased levels of renewable energy within the Irish and European electricity system; and
    - Enhancing the security of energy supply in Ireland.
- The nature, scale and location of the Project, situated approximately 6 km off the coast of Co. Louth and comprising an underground cable and associated infrastructure development, including the provision of a 220 kV substation and associated loop in connection to the national grid;
- The nature of the receiving environment, including the nature of the public road network along which the underground cable is proposed to be laid, the pattern of development in the area, and the nature of the landscape including any specific conservation and amenity designations along or in proximity to the proposed development;
- The consideration of alternatives for the design and routing / siting of the Project;
- Submissions and other input and advice received from statutory and non-statutory stakeholders during the project development process including the SID Unit of the Board, the more recently formed Marine/Climate Unit of the Board and Louth County Council, as well as from the general public, communities and landowners; and
- The documentation prepared for the application for permission, including the comprehensive EIAR and NIS.

It is considered that, subject to compliance with the measures set out in the EIAR and the NIS, the Project:

- Is in accordance with National policies, objectives and guidelines and with regional and local development plan policies and objectives;
- Would not seriously injure the amenities of the area or of property in the vicinity;
- Would not seriously injure the visual or recreational amenities of the area;
- Would not be prejudicial to public health or safety;
- Would not detract from the character or setting of features of architectural or archaeological heritage or the cultural heritage of the area;
- Would not seriously injure the biodiversity in the area; and
- Would be acceptable in terms of traffic safety and convenience.

Having regard to the above, it is considered that the Project comprises proper planning and sustainable development. Having regard to this Planning Report and the plans and particulars provided as part of this planning application and all enclosures included within the planning pack, it is respectfully requested that planning permission for development is granted for the Project.

Appendix A: NMPF Compliance Report

ORIEL OFFSHORE WIND FARM PROJECT

Planning Report

Appendix A: National Marine Planning Framework (NMPF) – Compliance Report

MDR1520B
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Tables

1 INTRODUCTION

This report sets out the relevant National Marine Planning Framework (Department of Housing, Local Government and Heritage, 2021) policies that are relevant to the development of the Oriel Wind Farm Project (hereafter referred to as 'the Project'). Table 1-1 outlines the overarching marine planning policies and provides a description of how the Project will comply with each policy and / or a reference to where the policy is addressed in the Environmental Impact Assessment Report (EIAR) (volumes 2A, 2B and 2C) and / or the Planning Report.

Table 1-1 outlines the sectoral marine planning policies for energy-offshore renewable policies and other sectors (where relevant) and provides a description of how the Project will comply with each policy and / or provides a reference to where the policy is addressed in the EIAR (volumes 2A, 2B and 2C) and / or the Planning Report.

1.1 Overarching marine policies

Table 1-1: Project consistency with National Marine Planning Framework overarching marine policies.

NMPF Policies	Project consistency with policy
Environmental – Ocean Health	
Environmental – Ocean Health Policy 1 *Compliance with NMPF policies relating to:* • *Biodiversity* • *Non-Indigenous Species* • *Water Quality* • *Sea-floor and Water Column Integrity* • *Marine Litter* • *Underwater Noise* *should include demonstration of contribution to the relevant MSFD targets identified.*	The Project will align with this policy as outlined in each of the individual topic policies noted below. Regarding the Project's contribution to the MSFD targets, please refer to chapter 7: Marine Processes (volume 2B). The Project will not cause a deterioration in water body status or prevent the achievement of the environmental objectives of the water bodies affected as outlined in appendix 7-2: Water Framework Directive (WFD) Assessment (volume 2B).
Biodiversity Policy 1 *Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity.*	The Project will align with this policy by avoiding, minimising and mitigating significant adverse impacts on species migration and access to key habitats as set out in: • Chapter 8: Benthic, subtidal and intertidal ecology (volume 2B); • Chapter 9: Fish and Shellfish Ecology (volume 2B); • Chapter 10: Marine Mammals and Megafauna (volume 2B); • Chapter 11: Offshore Ornithology (volume 2B); and • Chapter 19: Onshore Biodiversity (volume 2C). The accordance of the Project with this policy is also summarised in section 7 of the Planning Report.
Biodiversity Policy 2 *Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats.*	The Project will align with this policy by avoiding significant reduction in habitats and minimising disturbance or displacement of habitats as set out in: • Chapter 8: Benthic, subtidal and intertidal ecology; • Chapter 9: Fish and Shellfish Ecology; • Chapter 10: Marine Mammals and Megafauna; • Chapter 11: Offshore Ornithology; and

NMPF Policies	Project consistency with policy
	• Chapter 19: Onshore Biodiversity.
Biodiversity Policy 3 *Where marine or coastal natural capital assets are recognised by Government:* • *Proposals must seek to enhance marine or coastal natural capital assets where possible.* • *Proposals must demonstrate that they will in order of preference, and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant adverse impacts on marine or coastal natural capital assets, or* *d) if it is not possible to mitigate significant adverse impacts on marine or coastal natural capital assets proposals must set out the reasons for proceeding.*	The Project will align with this policy by avoiding significant adverse impacts on marine or coastal natural capital assets as set out in: • Chapter 8: Benthic, subtidal and intertidal ecology; • Chapter 9: Fish and Shellfish Ecology; • Chapter 10: Marine Mammals and Megafauna; and • Chapter 11: Offshore Ornithology.
Biodiversity Policy 4 *Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant disturbance to, or displacement of, highly mobile species.*	The Project will align with this policy by avoiding significant disturbance to, or displacement of, highly mobile species as set out in: • Chapter 9: Fish and Shellfish Ecology; • Chapter 10: Marine Mammals and Megafauna; and • Chapter 11: Offshore Ornithology; and • Chapter 19: Onshore Biodiversity.
Protected Marine Sites Policy 1 *Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.*	The Project aligns with this policy. A Natura Impact Statement (NIS) has been prepared for the Project and accompanies the application. The NIS concludes that the Project will not result in adverse effects on the integrity of any SAC or SPA with the implementation of mitigation measures. The accordance of the Project with this policy is also summarised in section 7 of the Planning Report.
Protected Marine Sites Policy 2 *Proposals supporting the objectives of protected marine sites should be supported and:* • *be informed by appropriate guidance.* • *must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites.*	The Project indirectly supports the objectives of protected marine sites by reducing greenhouse gas emissions and impacts from climate change.
Protected Marine Sites Policy 3 *Proposals that enhance a protected marine site's ability to adapt to climate change, enhancing the resilience of the protected site, should be supported and:* • *be informed by appropriate guidance.* • *must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites.*	
Protected Marine Sites Policy 4 *Until the ecological coherence of the network of protected marine sites is examined and understood, proposals should identify, by review of best available evidence (including consultation with the competent authority with responsibility for designating such areas as required), the features, under consideration at the time the application*	The Project aligns with this policy by avoiding where possible adverse effects on habitats and species of designated sites (i.e. European sites and other sites designated for nature conservation e.g. National sites, nature reserves etc.) as set out in:

NMPF Policies	Project consistency with policy
is made, that may be required to develop and further establish the network. Based upon identified features that may be required to develop and further establish the network, proposals should demonstrate that they will, in order of preference, and in accordance with legal requirements: *a) avoid,* *b) minimise, or* *c) mitigate* *significant impacts on features that may be required to develop and further establish the network, or* *d) if it is not possible to mitigate significant impacts, proposals should set out the reasons for proceeding.*	• Chapter 8: Benthic and Intertidal Ecology; • Chapter 9: Fish and Shellfish Ecology; • Chapter 10: Marine Mammals and Megafauna; • Chapter 11: Offshore Ornithology; • Chapter 19: Onshore Biodiversity; and • The Natura Impact Statement (NIS). These chapters and the NIS were prepared using best available scientific evidence, and outline measures to minimise and mitigate potential effects on designated and European sites, where required. Details on consultation are also provided within these chapters and within the NIS. The above listed EIAR chapters conclude that the Project (with the implementation of mitigation measures) will not result in significant adverse effects on sensitive habitats and species. The NIS concludes that the Project (with the implementation of mitigation measures) will not result in adverse effects on the integrity of any SAC or SPA.
Non-Indigenous Species Policy 1 *Reducing the risk of the introduction and / or spread of non-indigenous species is a requirement of all proposals. Proposals must demonstrate a risk management approach to prevent the introduction of and / or spread of non-indigenous species, particularly when:* *a) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another,* *b) introducing structures suitable for settlement of non-indigenous species, or the spread of non-indigenous species known to exist in the area of the proposal.*	The Project aligns with this policy. The Project includes measures to reduce the risk of the introduction and / or spread of non-indigenous species. These include a Marine Invasive Non-Native Species Management Plan (see appendix 5-3, EIAR volume 2A)); and an Environmental Management Plan (appendix 5-2, EIAR volume 2A). These documents describe the methods at which the Project will reduce the risk of the introduction and / or spread of non-native species.
Water Quality Policy 1 *Proposals that may have significant adverse impacts upon water quality, including upon habitats and species beneficial to water quality, must demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant adverse impacts.*	The Project will align with this policy by avoiding significant adverse impacts on water quality including upon habitats and species beneficial to water quality as set out in: • Chapter 7: Marine Processes and Water Quality; • Chapter 8: Benthic, subtidal and intertidal ecology; • Chapter 9: Fish and Shellfish; • Chapter 10: Marine Mammals and Megafauna; and • Chapter 11: Offshore Ornithology. The Project will not cause a deterioration in water body status or prevent the achievement of the environmental objectives of the water bodies affected as outlined in appendix 7-2: WFD Assessment. An Environmental Management Plan (appendix 5-2); a Marine Pollution Contingency Plan (annex 2 of appendix 5-2) and an Emergency Response Co-operation Plan (appendix 5-7) has been prepared for the Project and accompanies the application. These documents describe the methods at which the Project aims to avoid, minimise and mitigate significant

NMPF Policies	Project consistency with policy
	adverse impacts on water quality through pollution response plans and other means.
Water Quality Policy 2 *Proposals delivering improvements to water quality, or enhancing habitats and species, which can be of benefit to water quality, should be supported.*	It is considered that this policy is not applicable to the subject Project as it will not deliver improvements to water quality or enhance habitats and species which can be of benefit to water quality. However, it should be noted that the Project will not result in significant adverse effects on water quality as outlined in chapter 7: Marine Processes and chapter 22: Hydrology and Flood Risk.
Sea-floor and Water Column Integrity Policy 1 *Proposals that incorporate measures to support the resilience of marine habitats will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority and where they contribute to the policies and objectives of this NMPF. Proposals which may have significant adverse impacts on marine, particularly deep sea, habitats must demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant adverse impacts on marine habitats, or* *d) if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding.*	The Project will align with this policy by avoiding significant adverse impacts on marine habitats as set out in: • Chapter 7: Marine Processes; and • Chapter 8: Benthic, Subtidal and Intertidal Ecology.
Sea-floor and Water Column Integrity Policy 2 *Proposals, including those that increase access to the maritime area, must demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise, or* *c) mitigate* *adverse impacts on important habitats and species.*	The Project will align with this policy by avoiding significant adverse impacts on important habitats and species as set out in: • Chapter 8: Benthic, Subtidal And Intertidal Ecology; • Chapter 9: Fish and Shellfish Ecology; • Chapter 10: Marine Mammals and Megafauna; and • Chapter 11: Offshore Ornithology.
Sea-floor and Water Column Integrity Policy 3 *Proposals that protect, maintain, restore and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must take account of the space required for coastal habitats, for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference and in accordance with legal requirements:* *a) avoid,* *b) minimise , or* *c) mitigate* *for net loss of coastal habitat.*	The Project will align with this policy by avoiding significant adverse impacts on coastal habitat as set out in: • Chapter 7: Marine Processes and Water Quality; • Chapter 8: Benthic, subtidal and intertidal ecology; • Chapter 21: Soils, Geology and Hydrogeology (including appendix 21-1: Coastal Erosion Report)
Marine Litter Policy 1 *Proposals that facilitate waste re-use or recycling, or that reduce marine and coastal litter will be supported, where they contribute to the policies and objectives of this NMPF. Proposals that could potentially increase the amount of litter that is discharged into the maritime area, either intentionally or accidentally, must include measures (such as development of a waste management plan) to, in order of preference and in accordance with legal requirements:* *a) avoid,*	The Project will align with this policy by minimising litter in the maritime area through implementation of an EMP (appendix 5-1 in EIAR volume 2A). The EMP includes measures to manage all waste without the creation of litter.

NMPF Policies	Project consistency with policy
b) *minimise, or* c) *mitigate* *the litter. Demonstration of these measures must provide satisfactory evidence that the proposal is able to manage all waste without creation of litter.*	
Underwater Noise Policy 1 *Proposals must take account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna.* *Where the potential for significant impact on marine fauna from underwater noise is identified, a Noise Assessment Statement must be prepared by the proposer of development. The findings of the Noise Assessment Statement should demonstrably inform determination(s) related to the activity proposed and the carrying out of the activity itself.* *The content of the Noise Assessment Statement should be relevant to the particular circumstances and must include:* • *Demonstration of compliance with applicable legal requirements, such as necessary assessment of proposals likely to have underwater noise implications, including but not limited to:* – *Appropriate Assessment (AA);* – *Environmental Impact Assessment (EIA);* – *Strategic Environmental Assessment (SEA);* – *Specific response to 'strict protection' requirements of Article 12 of the Habitats Directive in relation to certain species listed in Annex IV of the Directive; and* – *Species protected under the Wildlife Acts.* • *An assessment of the potential impact of the development or use on the affected species in terms of environmental sustainability;* • *Demonstration that significant adverse impacts on marine fauna resulting from underwater noise will, in order of preference and in accordance with legal requirements be:* a) *avoided,* b) *minimised, or* c) *mitigated, or* d) *if it is not possible to mitigate significant adverse impacts on marine fauna, the reasons for proceeding must be set out.* *This policy should be included as part of statutory environmental assessments where such assessments require consideration of underwater noise.*	The Project will align with this policy by avoiding significant adverse impacts from underwater noise on marine mammals as set out in: • Chapter 10: Marine Mammals and Megafauna. An assessment of the potential effects of underwater noise (i.e. noise assessment statement) during the construction, operational and maintenance and decommissioning phases of the Project have been undertaken and is outlined in chapter 10: Marine Mammals and Megafauna (EIAR volume 2B). The measures included in the Project to prevent and reduce noise impacts are discussed in this chapter. Measures include implementation of a Marine Megafauna Mitigation Plan (MMMP) (see appendix 5-4 in volume 2A) and use of soft starts following NPWS (2014) guidelines and ADD (Acoustic Deterrent Device) is also proposed as mitigation.
Air Quality Policy 1 *Proposals that support a reduction in air pollution should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must demonstrate consideration of their contribution to air pollution, both direct and cumulative.*	The effect of the Project on air pollution is considered in chapter 23: Air Quality (volume 2C). The Project avoids significant adverse effects on air quality and indirectly results in beneficial impacts on air quality by offsetting fossil fuel generation with renewable energy (see chapter 17: Climate (volume 2C).
Air Quality Policy 2 *Where proposals are likely to result in or facilitate an increase in air pollution, proposals should demonstrate that they will, in order of preference in accordance with legal requirements and standards:* e) *avoid,* f) *minimise, or* g) *mitigate* *air pollution.*	The Project avoids significant adverse effects on air quality as outlined in chapter 23: Air Quality (volume 2C)

NMPF Policies	Project consistency with policy
Climate Change Policy 1 *Proposals should demonstrate how they:* • *avoid contribution to adverse changes to physical features of the coast;* • *enhance, restore or recreate habitats that provide a flood defence or carbon sequestration ecosystem services where possible.* *Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements:* *a) avoided,* *b) minimised,* *c) mitigated,* *d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.* *This policy should be included as part of statutory environmental assessments where such assessments are required.*	The Project aligns with this policy as works will avoid adverse changes to physical features of the coast as outlined in • Chapter 7: Marine Processes (volume 2B); and • Chapter 21: Soil, Geology and Hydrogeology (including appendix 21- 1: Coastal Erosion Assessment Report) (volume 2C).
Climate Change Policy 2 *For the lifetime of the proposal, the following climate change matters must be demonstrated:* • *estimation of likely generation of greenhouse gas emissions, both direct and indirect;* • *measures to support reductions in greenhouse gas emissions where possible;* • *likely impact of climate change effects upon the proposal from factors including but not limited to: sea level rise, ocean acidification, changing weather patterns;* • *measures incorporated to enable adaptation climate change effects;* • *likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities;* • *where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements:* *a) avoided,* *b) minimised,* *c) mitigated,* *d) if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.*	The Project aligns with this policy as outlined in • Chapter 17: Climate (volume 2C). In this chapter an estimate of generation of direct and indirect GHG emissions is provided along with measures to reduce emissions during construction. The likely impact of climate change effects on the Project are examined in chapter 24: Major Accident and Natural Disasters (EIAR volume 2C). The accordance of the Project with this policy is also summarised in section 7 of the Planning Report.
Economic – Thriving Maritime Economy	
Co-existence Policy 1 *Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate.* *If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference:* *a) minimise significant adverse impacts,* *b) mitigate significant adverse impacts, or* *c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.*	It is demonstrated how the Project will coexist and co-operate both spatially and temporally with other marine interests and activities in the assessments presented in volume 2B (see chapter 13: Shipping and Navigation; chapter 12: Commercial Fisheries) Consultation with stakeholders who have interests in the marine are outlined in chapter 6 in volume 2A. The development of Project in the marine environment has been kept to a minimum footprint as outlined in chapter 4: Consideration of Alternatives (volume 2A).

NMPF Policies	Project consistency with policy
	The accordance of the Project with this policy is also summarised in section 7 of the Planning Report.
Infrastructure Policy 1 *Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.*	The Project requires both onshore and offshore infrastructure. The Project will make landfall 700 m south of Dunany Point. The land-based infrastructure is i.e. the onshore cable will facilitate the transfer of energy from the wind farm to the onshore substation. The construction, operational and maintenance and decommissioning phases of the Project will generate activity at ports and diversify marine industry.
Social – Engagement with the Sea	
Access Policy 1 *Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference:* *a) avoid,* *b) minimise, or* *c) mitigate* *significant adverse impacts on public access.*	The Project will not impact on public access once constructed. During construction of the offshore cable (between the LWM and HWM) and the Transition Joint Bay, there will be access restrictions on areas of the beach at Dunany, which may lead to temporary disruption of public open space. However, these will be temporary (see chapter 18: Population and Human Health (volume 2C). There will also be restrictions on certain recreational activities during construction such as those outlined in chapter 16: Infrastructure and Other Users (volume 2B).
Access Policy 2 *Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider the future provision of services for tourism and recreation activities, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.*	The Project considers the future provision of tourism and recreational activities in chapter 16: Infrastructure and Other Users (volume 2B). The effects are found to range from imperceptible adverse significance to slight adverse significance.
Employment Policy 1 *Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are:* • *in line with the skills available in Irish coastal communities adjacent to the maritime area,* • *improve the sustainable use of natural resources,* • *diversify skills to enable employment in emerging industries.*	The Project will provide direct and indirect access to employment in the offshore wind energy industry for coastal communities as outlined in chapter 18: Population and Human Health (volume 2C).
Heritage Assets Policy 1 *Proposals that demonstrate they will contribute to enhancing the significance of heritage assets will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals unable to contribute to enhancing the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:* *a) avoid,* *b) minimise, or* *c) mitigate* *harm to the significance of heritage assets, and* *d) if it is not possible, to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the*	The Project infrastructure has been selected to avoid direct impacts on marine heritage assets. An assessment of the Project on marine archaeology is provided in chapter 15: Marine Archaeology (volume 2B). An assessment of the Project on the setting of coastal historic features is provided in chapter 26: Cultural Heritage (volume 2C).

NMPF Policies	Project consistency with policy
significance of the heritage assets (see definition of 'Public Benefits' in the Glossary).	
Rural Coastal and Island Communities Policy 1	
Proposals contributing to access, communications, energy self-sufficiency or sustainability of rural coastal and / or island communities should be supported. Proposals should ideally be inclusive of continual education, skills development and training in marine sectors, thus improving the sustainability, social benefits and economic resilience of rural and island communities.	The Project proposes a workforce management plan as outlined in chapter 18: Population and Human Health (volume 2C).
Seascape and Landscape Policy 1	
Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference: *a) avoid,* *b) minimise, or* *c) mitigate* *d) significant adverse impacts on the seascape and landscape of the area.* *e) If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding.* *This policy should be included as part of statutory environmental assessments.*	An assessment of the potential impacts of the Project on the seascape and landscape are provided in chapter 27: Seascape, Landscape and Visual Impact (volume 2C) Chapter 4: Consideration of Alternatives and appendix 4-2: Preliminary Landscape Assessment of Design Options provide information on how the impacts on seascape and landscape from the Project have been minimised through an iterative design process. The accordance of the Project with this policy is also summarised in section 7 of the Planning Report.
Social Benefits Policy 1	
Proposals that enhance or promote social benefits should be supported. Proposals unable to enhance or promote social benefits should demonstrate that they will, in order of preference: *a) minimise, or* *b) mitigate* *significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits.*	At the construction, operation, maintenance and decommissioning phases the Project will create societal benefits through generating local employment as considered further in chapter 18: Population and Human Health (volume 2C). During construction of the offshore cable (between the LWM and HWM) and the Transition Joint Bay, there will be access restrictions on areas of the beach at Dunany. However, these will be temporary, see chapter 18: Population and Human Health. The Project will minimise the displacement of other existing or authorised activities that generate social benefits such as sailing, recreational fishing, kayaking, kite surfing, surfing and windsurfing, sea swimming and beach users etc. Such effects are considered to be imperceptible adverse - slight adverse as detailed in chapter 16: Infrastructure and Other Users (volume 2B).
Social Benefits Policy 2	
Proposals that increase the understanding and enjoyment of the marine environment (including its natural, historic and social value), or that promote conservation management and increased education and skills, should be supported.	The Project will promote education and skills through one-off and continuous learning opportunities, (e.g. apprentices) as outlined in chapter 18: Population and Human Health (volume 2C).
Transboundary Policy 1	
Proposals that have transboundary impacts beyond the maritime area, on either the terrestrial environment or neighbouring international jurisdictions, must show evidence of consultation with the relevant public authorities, including terrestrial planning authorities and other country authorities. Proposals should consider transboundary impacts throughout the lifetime of the proposed activity.	Details on consultation with neighbouring international jurisdictions is provided in chapter 6: Consultation (volume 2A). The potential for transboundary impacts is assessed in the chapters provided in volume 2B and 2C.

1.2 Sectoral marine policies

Sectoral marine policies which may be considered relevant to the Project have been included in **Table 1-2**.

Table 1-2: Project consistency with National Marine Planning Framework key sectoral / activity policies.

Key Sectoral / Activity Policies	Project Compliance
9 Aquaculture	
Aquaculture Policy 1 Proposals for sustainable development of aquaculture that: • *demonstrate use of innovative approaches, and / or* • *contribute to diversification of species being grown in a given locality, particularly proposals applying a multi-trophic approach, and / or* • *enhances resilience to the effects of climate change* should be supported	Pertains only to proposals for development of aquaculture and therefore is not considered further herein.
Aquaculture Policy 2 *Non-aquaculture proposals in aquaculture production areas must demonstrate consideration of, and compatibility with, aquaculture production. Where compatibility is not possible, proposals must demonstrate that they will, in order of preference:* *a) avoid;* *b) minimise;* *c) mitigate* *significant adverse impacts on aquaculture.* *d) If it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding.*	The Project is not located in a licensed aquaculture production area. The Project will not result in significant adverse impacts on aquaculture as outlined in chapter 12: Commercial Fisheries (volume 2B).
10 Defence and Security	
Defence and Security Policy 1 *Any proposal that has the potential to interfere with the performance by the Defence Forces of their security and non-security related tasks must be subject to consultation with the Defence Organisation.* *This includes potential interference with:* *a) Safety of navigation and access to naval facilities;* *b) Firing, test or exercise areas;* *c) Communication, and surveillance systems;* *d) Fishery protection functions.* *Proposals should only be supported where, having consulted with the Defence Organisation, they are satisfied that it will not result in unacceptable interference with the performance by the Defence Forces of their security and non-security related tasks.* *Any proposal will be subject to the relevant Environmental Assessments, as set out in the introduction to this NMPF.*	The potential to interfere with the performance of defence forces is examined in chapter 14: Aviation, Military and Communications (volume 2B). The Department of Defence has been consulted with in 2019, 2022 and 2023 as detailed in chapter 6: Consultation (volume 2B). The Project is not located in a 'Marine Danger and Restricted Area'. An EIAR and NIS have been prepared in respect of this Project and are enclosed under separate cover.
12 Energy – Natural Gas Storage	
Natural Gas Storage Policy	Pertains only to proposals for development of gas storage and therefore is not considered further herein.
13 Energy – Offshore Renewables	
ORE Policy 1 *Proposals that assist the State in meeting the Government's offshore renewable energy targets,*	

Key Sectoral / Activity Policies	Project Compliance
including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users.	The Project goes some way to directly enabling this policy by providing infrastructure that can generate 0.375 GW of offshore renewable electricity by 2030.
ORE Policy 2 *Proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (OREDP) and its successor. Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime. Into the future, areas designated for offshore energy development, under the Designated Marine Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting (or development of our marine resources) (Note – see Appendix D on Spatial Designation Process).*	The Project is consistent with ORE Policy 2 and its successor as detailed in the *Planning Report* and can enable the delivery of the Government's 2030 targets. The Project is located within waters ranging from c. 16 m to 30 m at a location identified in the OREDP as having *"Technical Opportunities"* for offshore wind. Furthermore, the relevant ORE policy measures are addressed in the assessment chapters included in volume 2B of the EIAR.
ORE Policy 3 Any non-ORE proposals that are in or could affect sites held under a permission or that are subject to an ongoing permitting or consenting process for renewable energy generation (wind, wave or tidal should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, or d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding. Applicants for non-ORE proposals in or affecting ORE sites should engage ORE developers in consultation during the pre-application processes as appropriate.	Pertains only to proposals for non-ORE development and therefore is not considered further herein.
ORE Policy 4 *Decisions on ORE developments should be informed by consideration of space required for other activities of national importance described in the NMPF.*	The Project is located on lands designated in the NMPF for *'marine renewable energy and infrastructure*'. The development of Project in the marine environment has been kept to a minimum footprint as outlined in chapter 4: Consideration of Alternatives (volume 2A). The impact of the Project on commercial fisheries is considered in chapter 12: Commercial Fisheries (volume 2B) and found there will be no significant adverse effects arising from the Project during the construction, operational and maintenance or decommissioning phases. The impact of the Project on shipping and navigation is considered in chapter 13: Shipping and Navigation (volume 2B) and found there are no significant effects on shipping or navigation. The impact of the Project on aviation, military and communications is considered in chapter 14: Aviation, Military and Communications (volume 2B), which concluded there will be no significant effects arising from the Project during the construction, operational and maintenance or decommissioning phases. The impact of the Project on population is considered in chapter 18: Population and Human Health (volume 2C). It is considered that the Project will at all project lifecycle stages generate

Key Sectoral / Activity Policies	Project Compliance
	employment, stimulate activity at port facilities and impact positively on the population. It is concluded that that there are no significant adverse impacts on other activities and the Project allows for the continued co-existence and co-operation with other activities.
ORE Policy 5 *Proposals for activity that may adversely impact ORE test projects by virtue of being within or adjacent to ORE test sites, or between site and landfall of ORE test projects that may adversely impact ORE test site projects, should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts.*	ORE Policy 5 is not applicable to the subject Project.
ORE Policy 6	Pertains only to proposals for development of wave, tidal, floating wind infrastructure and therefore is not considered further herein.
ORE Policy 7	Pertains only to proposals for development of ports and therefore is not considered further herein.
ORE Policy 8 *Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required.*	The Project will not traverse or impact on any existing cables as outlined in chapter 16: Infrastructure, Marine Recreation and Other Users. As outlined in the Planning Report, the consideration of existing cables has informed the design process as detailed in the EIAR. In addition, the location of the cable has been designed to ensure that it can be easily repaired in so far as that is possible. In addition, it is proposed to connect the project to the national grid via an existing 220 kV overhead line mast which will be decommissioned to allow for the construction of the two new Line Cable Interface Masts (LCIM). The LCIMs will facilitate the connection of the overhead lines to underground cables that will run from the towers into a termination point in the EirGrid GIS building in Compound 1.
ORE Policy 9 *A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. Where a development consent is applied for in an area already subject to permission, proposals must include a visualisation assessment to inform design and layout. Visualisation assessments should demonstrate consultation with communities that may be able to view the proposal, in addition to any other ORE development, which had received consent to proceed at a given site at the time the consent application is made, with the aim of minimising impact. Visualisation assessments will be informed by specific emerging guidelines (detailed in the actions set out in Annexes to this NMPF). Prior to specific guidelines being available, policy and best practice relating to visualisation assessment should be used. This consideration must be included as part of statutory environmental assessments where such assessment is required.*	Photomontages of the Project are provided in EIAR appendix 27-1: Seascape, Landscape and Visual Impact – Supporting Graphics. Consultation with communities was undertaken as outlined in chapter 6: Consultation and appendix 6-1: Public and Other Stakeholders Consultation Report. No other ORE development has received consent at the time of consent application. However, a photomontage showing a proposed ORE to the south is provided in appendix 27-1: Seascape, Landscape and Visual Impact – Supporting Graphics.
ORE Policy 10 *Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible.*	ORE Policy 10 is not applicable to the Project.
ORE Policy 11	The technology that is to be used in the Project is of the most advanced and efficient design. Further detail is provided in chapter 5: Project Description (volume 2A).

Key Sectoral / Activity Policies	Project Compliance
Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.	
14 Energy – Petroleum	
Petroleum Policy 1	
Proposals in areas where petroleum activities or petroleum production infrastructure have already been approved, or where applications consistent with the Government's prohibition on new exploration activity are under consideration, should only be authorised where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or the proposal is clearly of strategic or national importance. *Compatibility should be achieved, in order of preference, through:* *a) avoiding, or* *b) minimising, or* *c) mitigating* *adverse impacts.* *d) If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding*	The Project is not in close proximity to any existing petroleum authorisations as outlined in chapter 12: Infrastructure, Marine Recreation and Other Users (volume 2B).
Petroleum Policy 2	
Proposals potentially affecting future potential activity in areas (blocks) subject to existing petroleum authorisations should avoid sterilisation of that area for future petroleum-related activity consistent with Government policy, and demonstrate how they, in order of preference: *a) avoid, or* *b) minimise, or* *c) mitigate* *potential adverse impacts on those activities.* *d) If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.*	The Project is not in close proximity to any existing petroleum authorisations as outlined in chapter 12: Infrastructure, Marine Recreation and Other Users (volume 2B).
15 Energy – Transmission	
Transmission Policy 1	
Subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland's energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations. *This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government's target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system / interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems.*	The Project, which is subject to an EIAR, includes the necessary offshore and onshore cable connection for the proposed offshore wind farm to Ireland's electricity transmission system.
Transmission Policy 2	
Proposals for activities that are in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting	The Project will not affect other permitted or proposed energy transmission projects.

Key Sectoral / Activity Policies	Project Compliance
process for energy transmission proposals should demonstrate that they will, in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts, or d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding	
Transmission Policy 3 *Decisions on transmission developments should be informed by consideration of space required for other activities of national importance described in the NMPF.*	The Project does not impact in any discernible way on space required for other activities of national importance described in the NMPF.
Transmission Policy 4 *Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies. Designation of land-based zones for the purposes of co-ordination and integration with relevant Marine Plans must be considered, where appropriate.*	Transmission Policy 4 is not applicable to the Project.
Transmission Policy 5 *Proposals for construction or operation activities within one nautical mile of either of the two existing natural gas interconnector pipelines shall be avoided.* *If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered.* *If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures be put in place or the proposed activities altered.*	The Project is not within 1 nm of the two existing natural gas interconnectors as outlined in chapter 12: Infrastructure, Marine Recreation and Other Users (volume 2B).
16 Fisheries	
Fisheries Policy 1 *Proposals that may have significant adverse impacts on access for existing fishing activities, must demonstrate that they will, in order of preference:* *a) avoid,* *b) minimise, or* *c) mitigate* *such impacts.* *d) If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.*	The Project will not result in significant adverse effects on existing fishing activities as outlined in chapter 12: Commercial Fisheries. A Fisheries Management and Mitigation Strategy has been prepared and is provided in appendix 5-6 (volume 2A). The development of the Project considered existing fishing activity as outlined in chapter 4: Consideration of Alternatives.
Fisheries Policy 2 *Where significant impact upon fishing activity arising from any proposal is identified, a Fisheries Management and Mitigation Strategy (FMMS) should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and other*	A Fisheries Management and Mitigation Strategy has been prepared and is provided in appendix 5-6 (volume 2A). Details on consultation with Fisheries is provide in chapter 6: Consultation (volume 2A) and chapter 12: Commercial Fisheries (volume 2B).

Key Sectoral / Activity Policies	Project Compliance
interests as appropriate. All efforts should be made to agree the FMMS with those interests. *Those interests should also undertake to engage with the proposer and provide best available, transparent and accurate information and data in a timely manner to help complete the FMMS. The FMMS should be drawn up as part of readying a proposal prior to submission, with measures identified to be considered in finalising conditions of any authorisations granted. Development of the strategy should be coordinated with other relevant assessments such as EIA where possible.* *The content of the Fisheries Management and Mitigation Strategy (FMMS) should be relevant to the particular circumstances and could include:* • *An assessment of the potential impact of all stages of the development or other suggested use on the affected fishery or fisheries, both in socio-economic terms and in relation to environmental sustainability. This assessment* • *should include consideration of any impact upon cultural identity within fishing communities,* • *as well as identifying indirect / in-combination matters.* • *A recognition that the disruption to existing fishing opportunities / activity should be minimised as far as possible.* • *Demonstration of the public benefit(s) that outweigh the significant impacts identified.* • *Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity.* • *Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socio-economic impacts.* *Where it does not prove possible to agree with FMMS with all interests:* • *Divergent views and the reasons for any divergence of views between the parties should be fully explained in the FMMS, and dissenting views should be given a platform within the said FMMS to make their case.* • *Where divergent views are identified, relevant public authorities should be engaged to identify informal and formal steps designed to enable proposal(s) to progress.*	
Fisheries Policy 3	
Proposals that enhance the sustainability of fisheries or support a sustainable fishing industry, including the industry's diversification and or enhanced resilience to the effects of climate change, should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	The Project will contribute to reducing the effects of climate change which will result in indirect positive effects on fisheries.
Fisheries Policy 4	
Infrastructural proposals that enable access to fishing activities should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	Pertains only to infrastructural proposals that enable access to fishing activities and therefore is not considered further herein.
Fisheries Policy 5	
Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. If proposals cannot enhance	The Project will not result in significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes as outlined in chapter 9: Fish

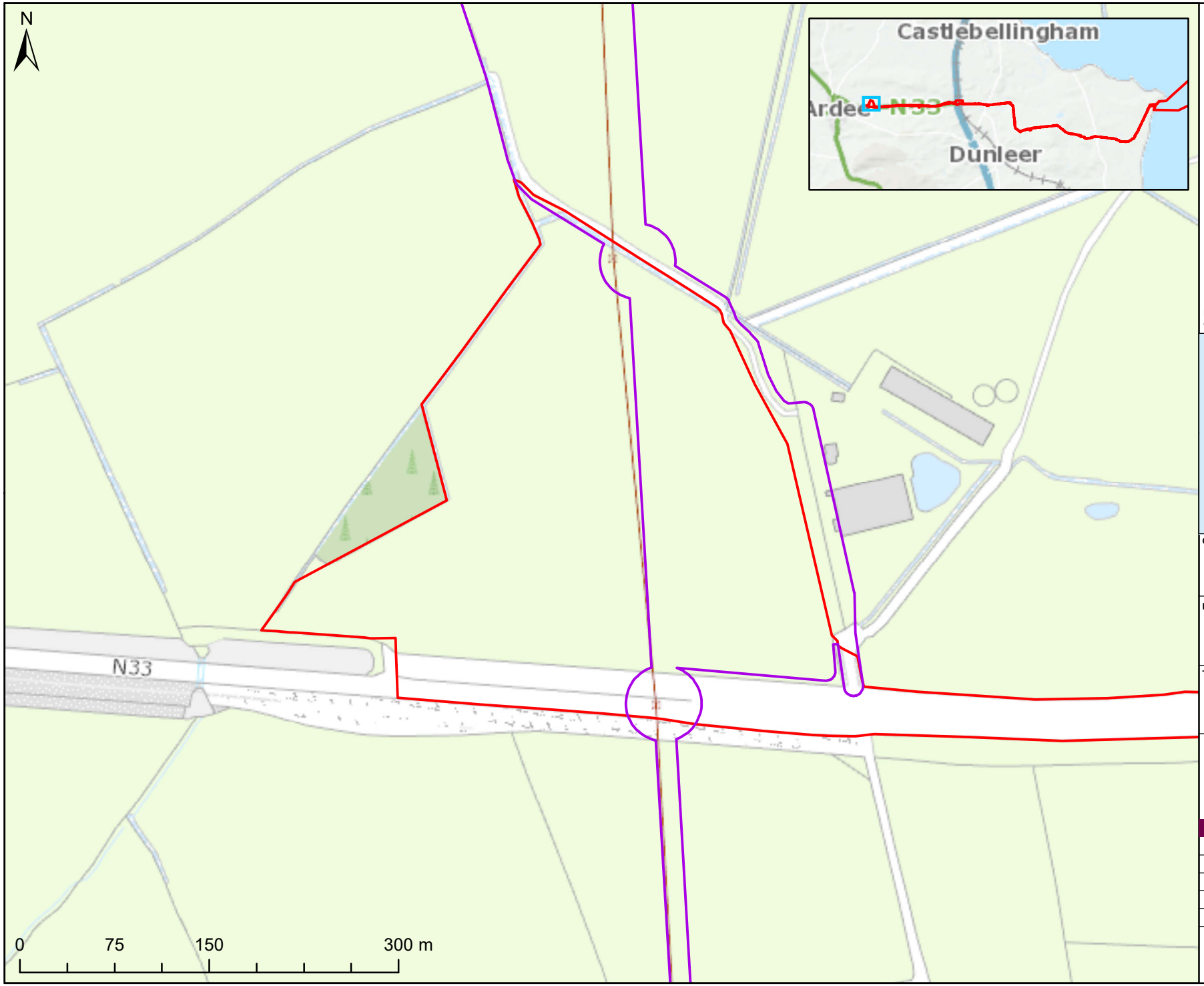
Key Sectoral / Activity Policies	Project Compliance
essential fish habitat, they must demonstrate that they will, in order of preference: *a) avoid,* *b) minimise,* *c) mitigate* *significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes.* *d) If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.*	and Shellfish Ecology and chapter 12: Commercial Fisheries (volume 2B).
Fisheries Policy 7	Pertains only to port and harbour development and therefore is not considered further herein.
17 Mineral Exploration and Mining	
Mineral Exploration and Mining Policy 1	Pertains only to mineral exploration and therefore is not considered further herein.
18 Ports, Harbours and Shipping	
Ports, Harbours and Shipping Policy 1 *To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use:* • *The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes;* • *A mandatory Navigation Risk Assessment;* • *Where interference is likely: whether reasonable alternatives can be identified; and* • *Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organisation can be achieved at no significant cost to the shipping or ports sector.*	A Navigational Risk Assessment (NRA) has been undertaken for the Project and is provided in appendix 13-1: Navigational Risk Assessment (volume 2B). An assessment of the impact on shipping and navigation which concludes there will be no significant impacts is provided in chapter 13: Shipping and Navigation (volume 2B).
Ports, Harbours and Shipping Policy 2	Pertains only to port and harbour activities and therefore is not considered further herein.
Ports, Harbours and Shipping Policy 3	Pertains only to port and harbour activities and therefore is not considered further herein.
Ports, Harbours and Shipping Policy 4 *Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have:* • *been informed by consultation at pre-application stage or earlier with the relevant port authority;* • *have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and* • *have consulted Department of Transport, MSO and Commissioners of Irish Lights.* *Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process.*	A Navigation Risk Assessment is included in appendix 13-1 (volume 2B). Details on consultation with stakeholders including the MSO and Commissioner of Irish Lights is outlined in chapter 6: Consultation (volume 2A).
Ports, Harbours and Shipping Policy 5	Pertains only to port and harbour dredging activity and therefore is not considered further herein.

Key Sectoral / Activity Policies	Project Compliance
Ports, Harbours and Shipping Policy 6 *In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity.*	The Project is not located in an area authorised for dredging activity.
Ports, Harbours and Shipping Policy 7	Pertains only to port and harbour dredging and maintenance activity and therefore is not considered further herein.
Ports, Harbours and Shipping Policy 8 *Proposals that cause significant adverse impacts on licensed disposal areas should not be supported. Proposals that cannot avoid such impact must, in order of preference:* *a) minimise,* *b) mitigate, or* *c) if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding.*	The Project is not located in an area licensed for disposal (see chapter 15: Infrastructure, Marine Recreation and Other Users).
Ports, Harbours and Shipping Policy 9 *Proposals for the management of dredged material must demonstrate that they have been assessed against the waste hierarchy (see Glossary).*	The Project will apply to the EPA for a Dumping at Sea permit prior to construction. See also chapter 4: Consideration of Alternatives, which examines the options for disposal of material.
Ports, Harbours and Shipping Policy 10 *Proposals identifying new dredge disposal sites which are subject to best practice and guidance from previous studies should be supported where:* • *competent authority decisions incorporate necessary compliance assessments associated with authorisations; and* • *they contribute to the policies and objectives of this NMPF.* *Proposals must include an adequate characterisation study, be assessed against the waste hierarchy and must be informed by consultation with all relevant stakeholders.*	The Project will apply to the EPA for a Dumping at Sea permit prior to construction.
19 Safety at Sea	
Safety at Sea Policy 1 *Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will:* • *Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout; and* • *Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels.*	A Navigational Risk Assessment (NRA) has been undertaken for the Project and is provided in appendix 13-1: Navigational Risk Assessment (volume 2B). The findings of the NRA and chapter 13: Shipping and Navigation with regard to Safety at Sea Policy 1 are further considered in section 7 of the Planning Report.
Safety at Sea Policy 2 *Proposals for infrastructure that have the potential to significantly reduce under-keel clearance must demonstrate how they will, in order of preference:* *a) avoid,* *b) minimise,* *c) mitigate* *adverse impacts, or*	The impact of the Project on under-keel clearance is assessed in chapter 13: Shipping and Navigation (volume 2B) and it is concluded there will be no significant impacts.

Key Sectoral / Activity Policies	Project Compliance
d) *if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.*	
Safety at Sea Policy 3 *All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.*	A Lighting and Marking Plan has been prepared and is included in appendix 5-9 (see volume 2A).
Safety at Sea Policy 4 *Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.*	A Lighting and Marking Plan has been prepared and is included in appendix 5-9 (see volume 2A). The Applicant has consulted with the Commissioners of Irish Lights as outlined in chapter 6: Consultation (see volume 2A).
Safety at Sea Policy 5 *Proposals must identify their potential impact, if any, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. Where a proposal may have a significant impact on these operations it must demonstrate how it will, in order of preference:* *a) avoid,* *b) minimise,* *c) mitigate* *adverse impacts, or* *d) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding, supported by parties responsible for maritime SAR.*	The Project has been designed in accordance with to minimise impacts on SAR as outlined in chapter 13: Shipping and Navigation (volume 2B). The Applicant has consulted with the Irish Coast Guard as outlined in chapter 6: Consultation. An Emergency Response Co-operation Plan (ERCoP) has been prepared and is included in appendix 5-7 (see volume 2A of the EIAR)
20 Sports and Recreation	
Sports and Recreation Policy 1	Pertains only to water-based sports and marine recreation development and therefore is not considered further herein.
Sports and Recreation Policy 2 *Proposals should demonstrate the following in relation to potential impact on recreation and tourism:* • *The extent to which the proposal is likely to adversely impact sports clubs and other physical infrastructure.* • *recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure.* • *The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety.* *The extent to which the proposal is likely to adversely impact on the natural environment.*	The impact of the Project on recreational, amenity and community facilities has been considered in chapter 18: Population and Human Health (volume 2C) and chapter 16: Infrastructure and Other Users (volume 2B). It is concluded that there are no significant effects.
Sports and Recreation Policy 3	Pertains only to water-based sports and marine recreation development and therefore is not considered further herein.
Sports and Recreation Policy 4	Pertains only to marine and coastal resources for tourism activities development and therefore is not considered further herein.
Sports and Recreation Policy 5 *Proposals should seek to enhance water safety through provision of appropriate International Organization for Standardization (ISO) and European Committee for Standardization (CEN) compliant safety signage. In general the safety of persons should be a key*	The Project has considered safety at sea in chapter 13: Shipping and Navigation (volume 2B).

Key Sectoral / Activity Policies	Project Compliance
consideration for planners and due consideration should be given to best practice guidance for marine and coastal recreation areas endorsed by the Visitor Safety in the Countryside Group.	
22 Telecommunications	
Telecommunications Policies 1 – 4	Pertain only to telecommunications development and therefore is not considered further herein.
23 Tourism	
Tourism Policy 1	Pertains only to proposals enabling, promoting or facilitating sustainable tourism and recreation activities and therefore is not considered further herein.
Tourism Policy 2 *Proposals must identify possible impacts on tourism. Where a potential significant impact upon tourism is identified it should be demonstrated how the potential negative consequences to tourism in communities will be minimised. This must include assessment of how the benefits of proposals are not outweighed by potential negative impacts.*	The impact of the Project on tourism has been considered in chapter 18: Population and Human Health (volume 2C). It is concluded that there are no significant effects.
Tourism Policy 3	Pertains only to tourism development and therefore is not considered further herein.

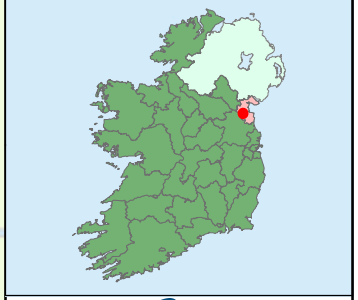
Appendix B: Maps of Relevant Planning History



Legend

- Planning Application Boundary
- LCC Planning Application Boundaries

Data Sources: OWL, An Bord Pleanála, Department of Housing, Local Government, and Heritage



Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

LCC Planning Applications

Application: 2360325

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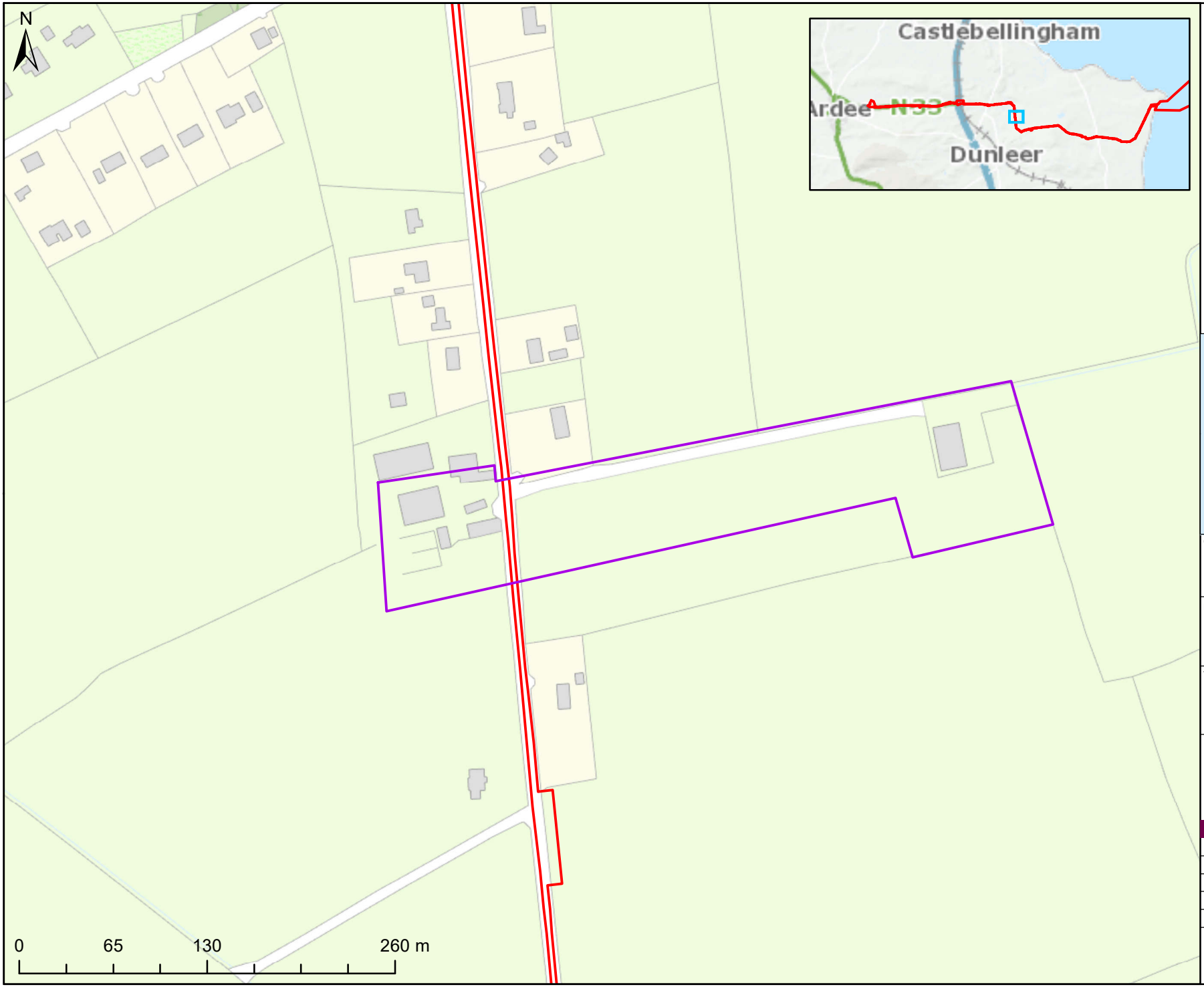
Issue Details

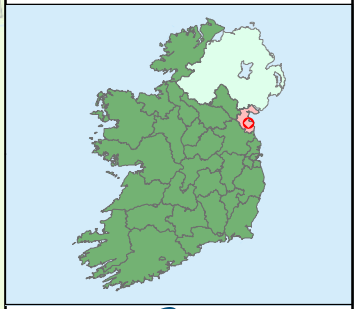
Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3127F02
Approved By: CC	
Scale: 1:4,000 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 12/03/2024	



Legend

- Planning Application Boundary
- LCC Planning Application Boundaries

Data Sources: OWL, An Bord Pleanála, Department of Housing, Local Government, and Heritage



Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

LCC Planning Applications

Application: 2227

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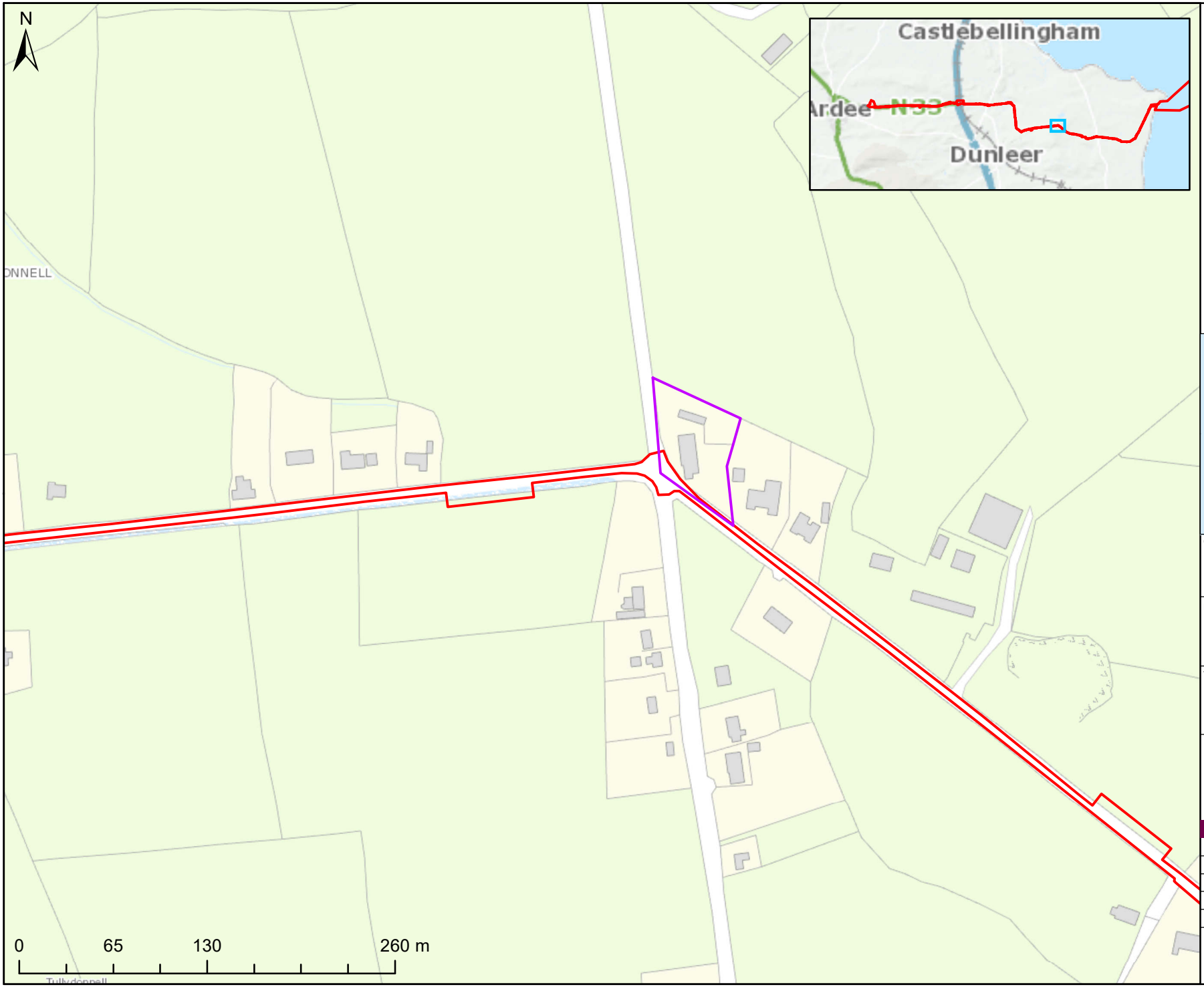
Issue Details

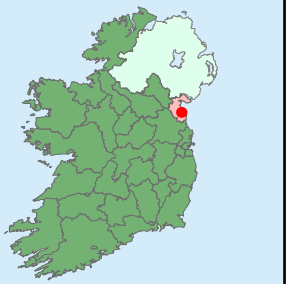
Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3127F02
Approved By: CC	
Scale: 1:3,500 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 12/03/2024	



Legend

- Planning Application Boundary
- LCC Planning Application Boundaries

Data Sources: OWL, An Bord Pleanála, Department of Housing, Local Government, and Heritage



Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

LCC Planning Applications

Application: 23399

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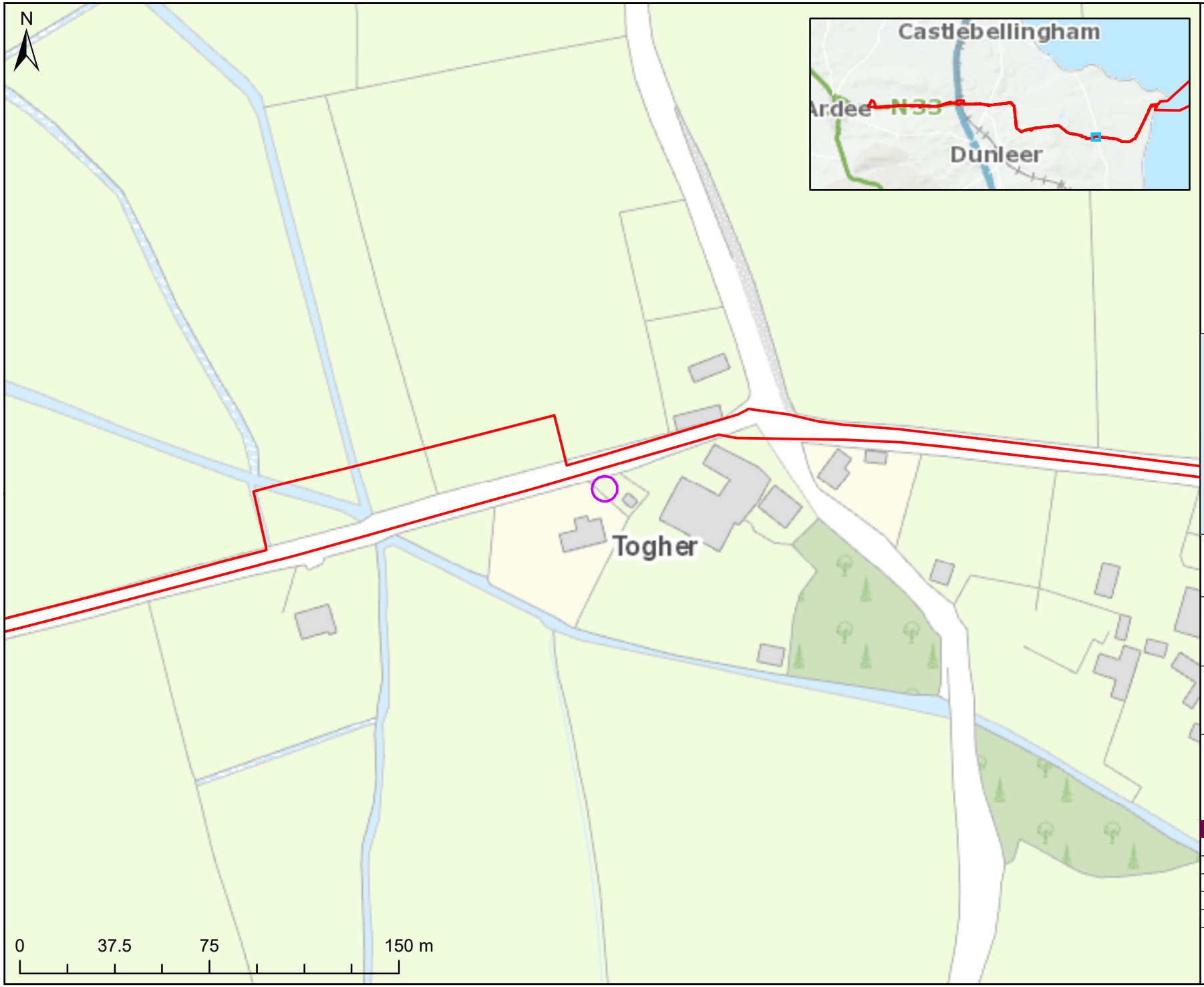
Issue Details

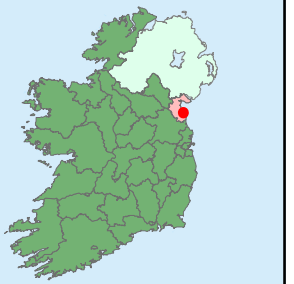
Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3127F02
Approved By: CC	
Scale: 1:3,500 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 12/03/2024	



Legend

- Planning Application Boundary
- LCC Planning Application Boundaries

Data Sources: OWL, An Bord Pleanála, Department of Housing, Local Government, and Heritage



Client

ORIEL WINDFARM
OFFSHORE RENEWABLE ENERGY

Project

Oriel Wind Farm Project

Title

LCC Planning Applications

Application: 21417

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Issue Details

Drawn By: NR	**Project No.** MDR1520b
Checked By: CC	**File Ref:** MDR1520bArc3127F02
Approved By: CC	
Scale: 1:2,000 @A4	**Projection:** ITM (IRENET95) Geographic Co-ordinates: ETRS89
Date: 12/03/2024	