

Submission to An Coimisiún Pleanála

Response to the Notice of Significant Additional Information:

North Irish Sea Array Offshore Wind Farm (Case ABP-319866-24)

21 October 2026

About Fingal Chamber

Fingal Chamber is one of Ireland's largest Chambers of Commerce, representing almost 500 companies employing more than 90,000 people across the Fingal region. Fingal Chamber works to make Fingal the best place in Ireland to live, work and do business. Representing businesses of all sizes and sectors, the Chamber advocates for the infrastructure, policy and investment needed to support sustainable economic growth and competitiveness across Fingal and Ireland as a whole.

Fingal is the host county for the onshore elements of the North Irish Sea Array. The project's landfall, onshore grid facility and cable route to Belcamp are all located within Fingal. This submission therefore comes from the business community with the most direct stake in how the project is decided and delivered.

Introduction

Fingal Chamber welcomes the opportunity to make a submission to An Coimisiún Pleanála in response to the Notice of Significant Additional Information published on 31 August 2026 in respect of the proposed North Irish Sea Array (NISA) Offshore Wind Farm, located off the coast of Counties Dublin, Meath and Louth (An Coimisiún Pleanála, 2026).

Fingal Chamber strongly supports the strategic development of Ireland's offshore renewable energy sector and regards offshore wind as among the most important national infrastructure priorities facing the State over the coming decade. Offshore renewable energy is central to Ireland's economic competitiveness, energy security and climate obligations. It is also essential if Ireland is to continue attracting and retaining investment in sectors that depend on secure, affordable and sustainable electricity, many of which are concentrated in Fingal.

The Chamber notes that the applicant has now furnished the further information requested by the Commission, and that the application has been in the planning system since June

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2024 (An Coimisiún Pleanála, 2026). The Chamber has considered the scope of the applicant's response of 29 June 2026, including the addenda to the Environmental Impact Assessment Report and Natura Impact Statement, and its support for the project as proposed is unchanged. On that basis, and for the reasons set out below, Fingal Chamber supports the proposed North Irish Sea Array and urges An Coimisiún Pleanála to grant permission without further delay.

The project and its connection to Fingal

The North Irish Sea Array is being developed by North Irish Sea Array Windfarm Limited, a partnership between Statkraft and Copenhagen Infrastructure Partners. The project holds Maritime Area Consent (Ref. 2022-MAC-005), granted in December 2022, and secured a 500 MW contract in Ireland's first Offshore Renewable Electricity Support Scheme auction (ORESS 1) in May 2023 (Statkraft, 2023). The application before the Commission seeks permission for a proposed export capacity of 700 MW (NISA EIAR, 2024, Chapter 1). It is one of the small number of projects that already hold the consents and route to market needed to deliver capacity this decade.

The application proposes either 35 or 49 turbines, with the nearest turbine more than 12 km from the coast. The developer estimates the project would power approximately 500,000 homes and displace around half a million tonnes of CO₂ each year (NISA, 2026). Onshore, the export cable makes landfall north of Balbriggan using trenchless drilling, connects to a new grid facility west of the R132 north of Balbriggan, and runs along local roads and under the M1 to the EirGrid-designated connection point at Belcamp substation (NISA, 2026). Every one of those onshore elements sits within Fingal.

The developer targets a start to onshore construction in 2027 and full delivery in 2031 (NISA, 2026). Those dates depend on a planning decision in the near term.

Alignment with Fingal's own plans

Support for this project is not a departure for Fingal. It is written into the county's statutory and economic plans.

The Fingal Development Plan 2023–2029 commits the Council, under Policy CAP16, to “support the implementation of the 2014 Offshore Renewable Energy Development Plan (OREDPP) and any successor thereof, and to facilitate infrastructure such as grid facilities on

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the land side of any renewable energy proposals of the offshore wind resource” (Fingal County Council, 2023, Policy CAP16). The Plan explicitly recognises that “potential also exists for the production of electricity from large-scale off-shore wind energy facilities off the coast of Fingal in the Irish Sea” and that the Council “will co-operate with state and semi-state agencies in relation to the implementation of projects in the Irish Sea” (Fingal County Council, 2023, section 5.5.3.3).

Future Fingal, the county’s Economic Development Strategy, identifies energy as one of Fingal’s “Grand Opportunities” and sets Objective 1.2 to “maximise opportunities which exist to advance renewable and alternative energy options, notably via offshore wind energy” (Fingal County Council, 2024). Action 1.2.1, to support the expansion of offshore wind energy production, names Fingal Chamber alongside Fingal County Council, SEAI, Balbriggan Chamber and Bremore Ireland Port as delivery partners (Fingal County Council, 2024). This submission is the Chamber acting on that commitment.

The project also aligns with Regional Policy Objective 10.24 of the Eastern and Midland Regional Spatial and Economic Strategy, which supports the sustainable development of Ireland’s offshore renewable energy resources and associated grid connection enhancements (EMRA, 2019), and with the Climate Action Plan’s commitment to 80% renewable electricity and at least 5 GW of offshore wind by 2030 (Government of Ireland, 2025).

Strategic importance of offshore wind

Ireland’s economy is becoming more electricity intensive. Continued growth in advanced manufacturing, digital infrastructure, aviation, logistics, transport electrification and low-carbon enterprise will raise electricity demand significantly over the coming years. Fingal sits at the centre of that growth: it is home to Dublin Airport, major pharmaceutical, ICT and agri-food clusters, and an estimated Gross Value Added of €23.6 billion (Fingal County Council, 2024). Its population reached 330,506 in 2022, up 11.6% since 2016, and it has the youngest age profile of any county in Ireland (CSO, 2023).

The State’s offshore wind ambitions are therefore not simply climate policy objectives. They are core economic and business policy objectives.

Progress against those objectives is well behind where it needs to be. Renewable energy supplied 15.9% of Ireland's total energy requirement in 2025, up from 14.6% in 2024 (SEAI, 2026). Independent analysis has concluded that the 2030 offshore wind target cannot be met with Ireland's existing port infrastructure (DCU, 2025). Ireland still has only one operating offshore wind farm, at Arklow Bank, built in 2004.

Projects such as NISA are critically important in that context. At a proposed export capacity of 700 MW, NISA alone would account for around 14% of the 2030 offshore wind target, and it is one of the few projects with the consents, grid connection and route to market needed to deliver within the current decade.

Energy security and competitiveness

Ireland's exposure to imported fossil fuels remains a structural vulnerability. Energy import dependency stood at 78.2% in 2025, against an EU average of 57.3% (SEAI, 2026, provisional). Fossil fuels still met 79.2% of Ireland's energy requirement in 2025 (SEAI, 2026).

This dependency has direct consequences for Fingal businesses. Irish business electricity prices averaged 24.27 cent per kWh in the first half of 2025, compared with an EU-27 average of 17.87 cent per kWh, a premium of more than a third (SEAI, 2025). Over recent years, firms across Fingal have absorbed sharp energy cost volatility that has hit operating margins, competitiveness and capacity to invest. For energy-intensive members in manufacturing, cold chain, logistics, aviation and data infrastructure, energy costs remain among the most significant operational challenges they face.

Offshore wind addresses this at source. Once built, it has near-zero marginal generation cost and is not exposed to commodity price movements or supply disruption from abroad. Every megawatt-hour NISA generates is a megawatt-hour of imported gas Ireland does not need to burn. Over a 25-year-plus operating life, that is a permanent improvement in the State's energy security and cost position.

Secure, sustainable electricity supply is now a prerequisite for investment decisions across many sectors. International investors increasingly weigh energy availability, grid stability and renewable access when choosing locations. Fingal competes for that investment every day. Accelerating delivery of projects like NISA is how Ireland meets those expectations.

Economic and employment benefits for Fingal

The economic potential of offshore wind is substantial and long term. The Government's Powering Prosperity offshore wind industrial strategy sets out the opportunity to build a domestic supply chain across engineering, construction, marine services, logistics, professional services and operations and maintenance (Department of Enterprise, Trade and Employment, 2024). Many of these opportunities extend across the operational life of a project, not just its construction phase.

For Fingal, the opportunity is local and specific:

- **Construction phase.** The developer estimates more than 1,100 jobs across construction and management (NISA, 2026). Onshore works around Balbriggan and along the cable route will generate demand for civil engineering, groundworks, haulage, plant hire, accommodation, catering and local trades.
- **Operations and maintenance.** A project of this scale requires sustained servicing over 25 years or more, creating long-term demand for marine services, technical skills and port capacity. Fingal's 88 km of coastline (Fingal County Council, 2021), its harbours at Balbriggan, Skerries, Rush and Howth, and the proposed Bremore Ireland Port position the county to capture a share of that activity.
- **Supply chain and SMEs.** Fingal has the highest labour force participation rate in the State at 65.6%, and 31% of residents are educated to degree level or above (Fingal County Council, 2024). The county has the skills base to serve this sector, but Irish SMEs need lead time to develop capability, prepare bids and form consortia.
- **Community benefit.** Under the ORESS rulebook the project will contribute €2 per MWh generated to a Community Benefit Fund, which the developer estimates at approximately €4 million per year, or around €80 million over the project's lifetime (NISA, 2026). Directed well, that fund can support skills programmes, local enterprise, environmental projects and community infrastructure in Balbriggan and the wider north Fingal coast. The Chamber asks that it be administered transparently, that its allocation give proper weight to the coastal communities of north Fingal that host the onshore infrastructure, and that it be structured to deliver measurable long-term value.

Fingal Chamber would welcome a formal commitment from the developer to engage early and transparently with Fingal businesses on procurement timelines, contract packages and skills needs. This is standard practice in mature offshore wind markets and should be the baseline expectation here. The Chamber stands ready to facilitate that engagement through its membership and partner networks.

Onshore infrastructure considerations

The landfall north of Balbriggan, the onshore grid facility, the cable route along local roads and under the M1, and the connection at Belcamp are material components of the project. Each is manageable, and each needs to be managed well.

Balbriggan is Fingal's third-largest town, with a population of 24,322 (CSO, 2023), and has been the focus of a €30 million rejuvenation programme funded under the Urban Regeneration and Development Fund (Fingal County Council, 2021). Businesses along the cable route and in the town will experience disruption during construction. Experience from other infrastructure projects in Ireland and across Europe shows that early, substantive engagement reduces conflict and produces workable solutions. Landowners and businesses that feel informed and consulted are far more likely to accommodate disruption that major infrastructure inevitably involves.

The Chamber therefore asks that any permission be accompanied by conditions requiring a construction traffic management plan agreed with Fingal County Council, a business liaison process for affected traders in Balbriggan and along the route, and continued coordination with the Council on the timing of works relative to the Balbriggan rejuvenation programme.

Planning and infrastructure delivery

Fingal Chamber has consistently highlighted the importance of timely and predictable planning processes across all forms of strategic infrastructure. Ireland's ability to deliver housing, transport, water, energy and digital infrastructure at scale will determine whether it can sustain competitiveness and support continued population and employment growth. Planning certainty is central to that.

Strategic infrastructure projects involve substantial upfront investment, long development timelines and complex delivery arrangements. Delays in consenting increase costs, create uncertainty and undermine investor confidence. This matters acutely in offshore wind, where

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capital and supply chain capacity are globally mobile and Ireland is competing with more mature markets.

The Chamber recognises the importance of robust environmental assessment, stakeholder engagement and proper planning scrutiny. This application has now been through more than two years of that scrutiny, including a further information process. It is equally important that the system delivers decisions within reasonable and predictable timeframes.

The consequences of delay are concrete. Delays to renewable energy infrastructure defer emissions reductions, prolong exposure to imported fuel, increase pressure on the grid and slow the growth of domestic supply chain capability. They also push back dependent investment in grid reinforcement, port infrastructure and industrial planning.

Grid, port and infrastructure coordination

Offshore wind projects cannot be considered in isolation. Grid connection, port infrastructure and marine licensing must advance in parallel with planning, not in sequence after it.

The connection to Belcamp substation forms part of EirGrid's wider reinforcement of the north Dublin network. The Chamber supports a coordinated approach that aligns planning, grid development, marine policy and industrial strategy, so that a positive decision on NISA translates quickly into construction, generation and local economic activity. Recent analysis has found that Ireland currently has only 44 hectares of planned laydown space for offshore wind against a need of 40 to 80 hectares for a single 1 GW project, and that developing the necessary port infrastructure would cost €2 to €3 billion (DCU, 2025). That gap reinforces the case for early planning decisions, so that port and grid investors have a confirmed pipeline to build against.

Conclusion

Ireland is entering a critical period for infrastructure delivery, energy transition and economic competitiveness. Whether the State meets its climate obligations, strengthens its energy security and remains an attractive location for enterprise investment will be decided in large part by whether projects like the North Irish Sea Array are consented and built this decade.

NISA holds a Maritime Area Consent, has secured a route to market through ORESS 1, has a confirmed grid connection and has now completed a further information process. It would deliver up to 700 MW of indigenous generation, around 14% of the 2030 offshore wind

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target, with its onshore infrastructure hosted in Fingal and the economic opportunity that brings.

Fingal Chamber therefore supports the proposed development and urges An Coimisiún Pleanála to grant permission. We ask that the decision be made promptly, and that conditions provide for coordinated management of onshore works with Fingal County Council and affected businesses, early supply chain engagement with Fingal enterprises, and a Community Benefit Fund that delivers for the north Fingal coast.

The timely delivery of strategically important energy infrastructure is essential to Ireland's economic future. The North Irish Sea Array must form part of that delivery pipeline.

Yours faithfully,

Anthony Cooney

Chief Executive Officer

Fingal Chamber

Two The Green, Dublin Airport Central, Dublin Airport, Swords, Co. Dublin, K67 E2H3

Email: anthony@fingalchamber.ie

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