**Sure Partners Limited** 

# ARKLOW BANK WIND PARK PHASE 2 **ONSHORE GRID INFRASTRUCTURE**

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

VOLUME II Chapter 2 Policy Context





# Contents

2

		Page
Policy Context		1
2.1	Introduction	1
2.2	European Context	1
2.3	National Planning Policy and Guidance	4
2.4	Regional Planning Policy and Guidance	12
2.5	Local Planning Policy and Guidance	14
2.6	Conclusion	16
2.7	References	17

# 2 Policy Context

## 2.1 Introduction

This chapter provides a summary of the hierarchy of European, national, regional and local planning and development policies of relevance to the proposed development.

# 2.2 European Context

## 2.2.1 European Green Deal

The European Green Deal, published by the European Commission in December 2019, provides an action plan to boost the efficient use of resources by moving to a clean, circular economy while cutting pollution and restoring biodiversity.

The plan outlines investments needed and financing tools available. It explains how to ensure a just and inclusive transition.

The EU aims to be climate neutral in 2050. A European Climate Law has been proposed by the European Commission to turn this political commitment into a legal obligation. Reaching this target will require action by all sectors of the Irish economy, including;

- investing in environmentally friendly technologies;
- supporting industry to innovate;
- rolling out cleaner, cheaper and healthier forms of private and public transport;
- decarbonising the energy sector;
- ensuring buildings are more energy efficient; and
- working with international partners to improve global environmental standards.

The EU will also provide financial support and technical assistance to help those that are most affected by the move towards the green economy. It will help mobilise at least €100 billion over the period 2021-2027 in the most affected regions.

In Section 2.1.2 "Supplying clean, affordable and secure energy" of the Deal, it is highlighted that further decarbonising the energy system is critical to reach climate objectives in 2030 and 2050. The production and use of energy across economic sectors account for more than 75% of the EU's greenhouse gas emissions. Energy efficiency must be prioritised. It states the following:

"Renewable energy sources will have an essential role. Increasing offshore wind production will be essential, building on regional cooperation between Member States. The smart integration of renewables, energy efficiency and other sustainable solutions across sectors will help to achieve decarbonisation at the lowest possible cost. The rapid decrease in the cost of renewables, combined with improved design of support policies, has already reduced the impact on households' energy bills of renewables deployment."

The proposed development complies with the objectives of the EU Green Deal as it will create additional renewable energy supply in Ireland helping to meet the EU targets and decarbonise energy generation.

#### 2.2.2 2021 EU Strategy on Adaptation to Climate Change

The new 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 has four principle objectives: to make adaptation smarter, swifter and more systemic, and to step up international action on adaptation to climate change.

Smarter adaptation: Adaptation actions must be informed by robust data and risk assessment tools that are available to all – from families building homes, businesses in coastal regions and farmers planning their crops. To achieve this, the strategy proposes actions that push the frontiers of knowledge on adaptation so that we can gather more and better data on climate-related risks and losses and enhance Climate-ADAPT as the European platform for adaptation knowledge.

Swifter adaptation: The effects of climate change are already being felt, and so we must adapt more quickly and comprehensively. The strategy therefore focuses on developing and rolling out adaptation solutions to help reduce climate-related risk, increase climate protection and safeguard the availability of fresh water.

More systemic adaptation: Climate change will have impacts at all levels of society and across all sectors of the economy, so adaptation actions must also be systemic. The Commission will continue to ensure climate resilience considerations are part of all relevant policy fields. It will support the further development and implementation of adaptation strategies and plans at all levels of governance with three cross-cutting priorities:

- integrating adaptation into macro-fiscal policy;
- nature-based solutions for adaptation; and
- local adaptation action.

Stepping up international action for climate resilience: The EU will increase support for international climate resilience and preparedness through the provision of resources, by prioritising action and increasing effectiveness, through the scaling up of international finance and through stronger global engagement and exchanges on adaptation.

The strategy's four objectives are underpinned by 14 actions and the steps to be taken to deliver them.

The European Climate Law proposes to commit the EU and its Member States to make continuous progress towards adaptive capacity, strengthen resilience and reduce vulnerability to climate change.

"The long-term vision is that in 2050, the EU will be a climate-resilient society, fully adapted to the unavoidable impacts of climate change. This means that by 2050, when we aim to have reached climate neutrality, we will have reinforced adaptive capacity and minimised vulnerability to climate impacts, in line with the Paris Agreement and the proposed European Climate Law."

The proposed development incorporates climate adaptation measures embedded throughout the design, ensuring climate resilience and compliance with the new EU Strategy on Adaptation to Climate Change.

#### 2.2.3 2030 Climate & Energy Framework

The European Green Deal means that the EU's climate and energy targets will need to be increased. The current targets for 2030 include -

- At least 40% cuts in greenhouse gas emissions (from 1990 levels);
- At least 32% share for renewable energy; and
- At least 32.5% improvement in energy efficiency.

The European Green Deal will increase the greenhouse gas (GHG) emissions reduction 2030 target to at least 55% in comparison to 1990 levels. Targets for renewable energy and energy efficiency are also likely to be increased.

The greenhouse gas target is implemented by the EU Emissions Trading System, the Effort Sharing Regulation with Member States' emissions reduction targets and the Land Use, Land Use Change and Forestry (LULUCF) Regulation. In this way, all sectors will contribute to the achievement of the 40% target by both reducing emissions and increasing removals.

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 Paris Agreement. These are outlined in Regulation (EU) 2018/1999 on the Governance of the Energy Union (the Governance Regulation).

Under the Governance Regulation, Member States are required to adopt integrated national energy and climate plans (NECPs) for the period 2021-2030 and national long-term strategies and ensure consistency between these strategies and their NECPs.

The proposed development would help meet the 2030 targets and objectives set out in the Climate and Energy Framework by providing a new renewable source of energy that will reduce reliance on fossil fuels and dependency on energy imports. It will also create opportunity for jobs and brings environmental and health benefits.

## 2.2.4 EU Strategy for Offshore Renewable Energy

In July 2020, the EU launched a roadmap for its Strategy for Offshore Renewable Energy. The aim of the roadmap was to inform citizens and stakeholders of the EU's approach to this strategy in order to allow them to provide feedback and to participate in consultation activities.

The roadmap also highlighted the EU response to the COVID-19 pandemic with regards to offshore renewable energy.

"As Europe deals with the effects of COVID-19 it is crucial to avoid significant delays in offshore renewables investment, as this sector can also ensure the recovery leads to sustainable growth."

The roadmap stated that the recovery from the COVID-19 crisis will be based on investments in line with the European Green Deal priorities as key drivers for economically sustainable and inclusive growth. Cross European deployment of offshore renewable energy that respects the principle to "do no harm" will be highly relevant in this perspective.

The EU published its strategy for Offshore Renewable Energy in November 2020. The aim of the strategy is to ensure that offshore renewable energy can help reach the EU's ambitious energy and climate targets. The strategy assesses the EU's potential contribution to the offshore renewable energy sector. The strategy is to support the long-term sustainable development of this sector. The European Commission estimates between 240 and 450 GW of offshore wind power is needed by 2050 to keep temperature rise below 1.5°C. The Strategy proposes to increase Europe's offshore wind capacity from its current level of 12 GW to at least 60 GW by 2030 and to 300 GW by 2050.

The strategy lays out how best to exploit and scale-up offshore renewables through generation, distribution and use. The strategy addresses the potential environmental effects of offshore renewable energy in line with the commitments in the EU Biodiversity strategy and European environmental legislation including undertaking noise assessment. The strategy looks at how available EU financial tools can be used more strategically to support the objectives.

The proposed development complies with the EU Strategy for Offshore Renewable Energy by providing a new source of offshore renewable wind energy.

# 2.3 National Planning Policy and Guidance

Ireland has introduced significant climate and energy policy and guidance in recent years, with increasingly ambitious targets being set to address climate change.

In 2014, the Government published the Offshore Renewable Energy Development Plan (OREDP) setting out key principles, policy actions and enablers for delivery of Ireland's significant potential for offshore renewable energy. The Energy White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030 was launched in 2015. This policy set out a framework to guide policy and actions that the government needed to take in the energy sector up to 2030.

In 2015, the government enacted the Climate Action and Low Carbon Development Act which specified the need for periodic national mitigation plans in order to specify policy measures to reduce emissions and meet national targets.

Project Ireland 2040: National Planning Framework and the National Development Plan 2018 – 2027 were published in 2018 and sets out a number of National Strategic Outcomes, one of which is to *Transition to a Low-Carbon and Climate-Resilient Society*.

The Citizens Assembly, set up under the Programme for Government (PfG) in 2016, recommended radical reform to our climate change approach. This was further endorsed by a special Oireachtas committee, who issued a comprehensive set of recommendations, which were unanimously endorsed by the Dáil, while at the same time declaring a Climate and Biodiversity Emergency.

This, together with the need for Ireland to respond to the UN's Agenda 2030 and the Paris Agreement, led to the introduction of the Climate Action Plan in 2019, which commits to decarbonising the economy and sets out sectoral roadmaps for how this will be achieved.

The new PfG *Our Shared Future*, agreed in June 2020, has accelerated the decarbonisation agenda even further, committing to a 7% average yearly reduction in overall greenhouse gases over the next decade, and to achieving net zero emissions by 2050.

As a result, the Climate Action and Low Carbon Development (Amendment) Bill was introduced in October 2020. This Bill, if enacted will commit Ireland in law, to move to a climate resilient and climate neutral economy by 2050. It also brings in a system of five-yearly economy-wide carbon budgets, starting in 2021, requires the annual revision of the Climate Action Plan and the preparation of a National Long Term Climate Action Strategy every ten years.

Details of some of the current relevant policies are included below.

## 2.3.1 National Energy and Climate Plan 2021-2030

The NECP, required under the EU Clean Energy Package, will see the production of a climate strategy with a statutory basis in EU law.

The NECP for each of the EU member states must include policy in relation to:

- Energy efficiency;
- Renewables;
- Greenhouse gas emissions reduction;
- Interconnections; and
- Research and innovation.

The NECP incorporates all planned energy and climate policies and measures (up to the end of 2019) and if implemented will collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels). The objectives in the NECP are regarded as a baseline, as opposed to the limit, of Ireland's ambition.

It should be noted that the NECP was finalised prior to the formation of the new Government (2020) and the corresponding more ambitious commitment to achieving a 7% annual reduction in greenhouse gas emissions between 2021 and 2030 or the 5GW offshore wind target. The NECP will therefore be revised to bring it in line with this more ambitious approach, and to include the policies and measures required to achieve this trajectory.

In terms of offshore wind, the NECP states that "Ireland is targeting at least 3.5 GW of offshore renewable energy ....".

It also states that:

"This will be delivered in a competitive framework of auctions and corporate contracting with a renewed focus on community and citizen participation."

The NECP identifies three phases to developing offshore wind in Ireland:

- Phase 1, which will take place in the first half of the Plan timeframe, includes the foundations and early projects as well as the development of a consenting regime for offshore wind;
- Phase 2 focuses on achieving the 2030 target of at least 3.5GW of offshore wind, moving towards full decarbonisation; and
- Phase 3 looks beyond 2030, at longer-term options.

The NECP also highlights that the main focus area for fixed bottom offshore wind development in Ireland up to 2030 will be "the Irish Sea East coast due to the relatively favourable sea depth and wave conditions, the more developed and robust onshore transmission system and the close location to big electricity demand growth centres" which is consistent with the Project.

The proposed development complies with the NECP as it aligns with the planned energy and climate policies including Ireland's national and international obligations, in particular the offshore renewable energy targets and the targeted reduction of greenhouse gas emissions.

## 2.3.2 Climate Action Plan 2019

The Government published its Climate Action Plan (to tackle Climate Breakdown) in 2019. The Plan sets out the actions the Government intends to take to address climate breakdown across sectors such as electricity, transport, built environment, industry and agriculture.

Chapter 7 addresses electricity. In Section 7.2, the Plan sets out a target of 70% renewable electricity generation by 2030.

"Achieving 70% renewable electricity by 2030 will involve phasing out coal- and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.

This will require Obligated Energy Suppliers to work more closely with community and enterprise to ensure wider community gain."

The measures to deliver the 70% renewable electricity target are set out in Section 7.3, and in relation to harnessing renewable energy, include:

"In the power generation sector, increasing onshore and offshore wind capacity are the most economical options for electricity production. This will include replacing existing coal- and peat-fired plants, as well as installing the new electricity capacity required to meet the increased power demand from transport and residential heating electrification. The cost included in the electricity analysis includes all capital expenditure on generation and storage. In all cases, it is assumed that the two planned interconnectors are delivered."

The Climate Action Plan sets the target required for offshore wind generation as 3.5GW by 2030 with an interim target of 1GW by 2025. Action 25 of the Climate Action Plan outlines the steps necessary to meet these ambitions spanning grid, consenting and route to market.

The Arklow Bank Wind Park Phase 2 will be capable of generating at least 1.8TWh of renewable electricity annually – enough green energy to offset 530,225 tonnes of carbon emissions annually, representing a significant contribution towards Ireland's 2030 targets for carbon emission reduction.<sup>1</sup> The proposed development would be delivered by 2025, so as to help meet Ireland's target of 1GW of offshore wind in the same year, putting Ireland on course to meet its offshore wind target by 2030.

#### 2.3.3 **Project Ireland 2040: National Planning Framework**

The Department of Housing, Planning and Local Government published Project Ireland 2040: National Planning Framework (NPF) in February 2018. The NPF is the overarching policy and planning framework for the social, economic and cultural development of the country. The NPF was published together with the National Development Plan 2018-2027 (outlined in **Section 2.3.5**) as one vision – Project Ireland 2040, meaning that implementation of the NPF is fully supported by the Government's investment strategy for public capital investment and investment by the State sector in general. The NPF is the overarching document guiding regional spatial and economic strategies and local development plans.

<sup>&</sup>lt;sup>1</sup> Total annual TWh quoted based on minimum installed capacity, typical load factor of 40%, and typical annual consumption (4,200kWh); Quoted CO2 emissions abated based on Average CO2 Emissions in 2018 (0.291 t/MWh) in the All-Island Single Electricity Market, and published by the CRU in its Fuel Mix Disclosure and CO2 Emissions for 2018, September 2019.

One of the primary objectives of the NPF is to improve resource efficiency and promote the movement towards a low carbon economy. The aim is to achieve this by:

- Sustainable Land Management and Resource Efficiency adopting the principles of the circular economy to enable more sustainable planning and land use management of our natural resources and assets;
- Low Carbon Economy accelerating action on climate change; and
- Renewable Energy transition to a low carbon energy future.

National Policy Objective 52 states:

"The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital".

The proposed development supports this objective as it supports the growth and integration of low carbon and renewable energy.

The NPF also highlights the ambitious national plans set under the Offshore Renewable Energy Development Plan (OREDP), for renewable energy and offshore renewable energy resource development. Over the period to 2040, it is likely that technological advances will accelerate the commercial application, development and deployment of a marine renewable energy sector including offshore floating wind farms, tidal turbine devices and wave energy converters. 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.

Furthermore, National Policy Objective 42 states:

"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."

The proposed development complies with this objective by providing infrastructure required to connect offshore renewable energy to the National Electricity Transmission Network (NETN).

This Environmental Impact Assessment Report (EIAR) documents how the development will occur within environmental limits and have regard to the requirements of all relevant environmental legislation.

#### 2.3.4 National Development Plan 2018-2027

The National Development Plan 2018 – 2027 (NDP) was published in conjunction with the NPF in February 2018. The NDP is the national plan setting out investment priorities to guide national, regional and local planning and investment decisions. The NDP prioritises investment in high-quality infrastructure through both public and private investors.

The NDP sets out the strategic investment priorities to address the deficits in public capital infrastructure, which will underpin the implementation of the National Planning Framework.

The NDP also identifies 10 national strategic outcomes which the Government intends to achieve in the lifetime of the plan. National strategic outcome 8 is the *"Transition to a Low-Carbon and Climate-Resilient Society"*. To achieve this outcome the plan identifies various strategic investment priorities and investment actions. Under the sub-heading 2 "Decarbonising Energy", the plan states:

#### "Decarbonising Energy

Ireland's energy system requires a radical transformation in order to achieve its 2030 and 2050 energy and climate objectives. This means that how we generate energy, and how we use it, has to fundamentally change. This change is already underway with the increasing share of renewables in our energy mix and the progress we are making on energy efficiency.

Investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. By 2030, peat and coal will no longer have a role in electricity generation in Ireland. The use of peat will be progressively eliminated by 2030 by converting peat power plants to more sustainable low-carbon technologies.

Investment in renewable energy must be complemented by wider measures to moderate growth in energy demand, diversify supply sources by greater interconnection to international energy networks, and increase adoption and utilisation of electricity storage and smart meters.

This will significantly increase our capacity to electrify heat and transport and promote less energy intensive/low-carbon heating solutions, including biomass and biogas.

*Measures required to decarbonise energy generation and enhance energy efficiency include those listed below.* 

- Decarbonising electricity generation.
- Develop further interconnection to increase energy security and facilitate more variable electricity generation on the grid...."

The Project is consistent with the NDP by providing infrastructure that will provide a source of renewable energy which will contribute to the decarbonisation of Ireland's energy generation.

#### 2.3.5 Draft National Marine Planning Framework

The Government published a draft of Ireland's first national framework for managing marine activities, National Marine Planning Framework (NMPF), in November 2019, which is due to be adopted by April 2021. The Draft NMPF is Ireland's first plan for more sustainable, effective management of marine activities and will inform the Government's objectives and priorities. This will guide decision makers, users and stakeholders towards more strategic, plan-led and efficient use of marine resources.

The Draft NMPF supports the establishment of Ireland as a world leader in offshore renewable energy deployment, highlighting the importance of offshore renewable energy in Ireland's decarbonisation journey. The Draft NMPF outlines a number of policies in relation to offshore renewable energy (ORE), including:

#### "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"

The proposed development is consistent with the above policy set out in the Draft NMPF by providing onshore grid infrastructure which supports offshore renewable energy development.

#### 2.3.6 **Programme for Government 2020: Our Shared Future**

Initially drafted in April 2020 and adopted in June, the PfG adds further momentum to the offshore wind industry, placing increased emphasis on developing the vast potential of Ireland's offshore renewables, along with establishing a clear path to achieving its targets.

The PfG commits to a 'revolution in renewables.' It says "We are all committed to the rapid decarbonisation of the energy sector. We will use this as an opportunity to create new, quality jobs across the country".

#### The programme also states:

"Produce a whole-of-government plan setting out how we will deliver at least 70% renewable electricity by 2030 and how we will develop the necessary skills base, supply chains, legislation, and infrastructure to enable it. This new plan will make recommendations for how the deployment of renewable electricity can be speeded up, for example the provision and permissioning of grid connections"

"This plan will set out a path to achieving 5GW capacity in offshore wind by 2030 off Ireland's Eastern and Southern coasts".

The PfG will focus on utilising our existing energy and maritime infrastructure as well as seeking to create the right investment environment, support ocean energy research, develop and demonstrate floating wind, tidal, and wave power, together with developing innovative transmission and storage technologies, such as high-voltage, direct-current interconnection and green hydrogen on an all-island basis. The PfG will set out a path to achieving 5GW capacity in offshore wind by 2030 off Ireland's Eastern and Southern coasts, an increase from the 3.5GW target that was set out in the Climate Action Plan 2019 (outlined in **Section 2.3.2**). The PfG also commits to pursuing a net zero target by 2050. The proposed Climate Action (Amendment) Bill 2020 will put this target into legislation.

The proposed development aligns with the actions and targets set out in the PfG regarding the need for investment in renewable energy, specifically marine renewable energy. The overall Project would be Ireland's first offshore wind farm of major scale. If built, it would help to decarbonise Ireland's environment by 1% annually and power around half a million Irish homes. The proposed development would be delivered by 2025, so as to help meet Ireland's target of 1GW of offshore wind in the same year, putting Ireland on course to meet the 5GW target by 2030.

## 2.3.7 Offshore Renewable Energy Development Plan

In 2014, the Government published the Offshore Renewable Energy Development Plan (OREDP). The OREDP sets out key principles, policy actions and enablers for delivery of Ireland's significant potential for offshore renewable energy. In this way, the OREDP provides a framework for the sustainable development of Ireland's offshore renewable energy resources.

The OREDP identifies opportunity for the following:

- The sustainable development of Ireland's abundant offshore renewable energy resources;
- To increase indigenous production of renewable electricity;
- To contribute to reductions in our greenhouse gas emissions;
- To improve the security of our energy supply; and
- Creating jobs in the green economy.

The OREDP looks towards 2030 and 2050 setting goals to decarbonise Ireland's electricity system which will require the expansion of our renewable generation including offshore wind.

The OREDP lists a number of policies and enabling actions which have been identified as key to the development of the offshore renewable energy sector. The actions include -

"5. Develop the Supply Chain for the Offshore Renewable Energy Industry in Ireland ... export renewable electricity which could bring potentially significant employment creation opportunities. In addition to construction, and operations and maintenance jobs, the supply chain for wind generation will be galvanised as such projects are likely to form a significant part of the initial export activity."

"10. Ensure Appropriate Infrastructure Development: The development of offshore renewable energy is critically dependent on the development of enabling infrastructure at a number of points in its value chain, including grid and port facilities."

The proposed development complies with the OREDP by providing the infrastructure required to connect an offshore renewable energy source to the National Electricity Transmission Network (NETN), providing electricity for Irish homes. Ireland's OREDP will be reviewed and updated in 2021 to reflect our increased offshore ambitions.

# 2.4 Regional Planning Policy and Guidance

### 2.4.1 Regional Planning Guidelines for the Greater Dublin Area 2010-2022

The Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022 (Regional Planning Guidelines) set out the strategic policy for Dublin and the mid-east region over the twelve-year period to 2022. They provide a regional context to the National Spatial Strategy (the precursor to the National Planning Framework) and the individual development plans contained within the Greater Dublin Area (GDA).

The Regional Planning Guidelines effectively implement the National Spatial Strategy, whilst providing more detail and establishing a regional development and spatial framework that can be used to strengthen local authority development plans and other planning strategies at county, city and local level. The Regional Planning Guidelines prioritises value for money strategic state investments and a coordinated approach with Government agencies, departments and stakeholders.

The Regional Planning Guidelines highlight the need to fully exploit renewable energy potential such as wind and wave energies and reduce national dependency on imported fuels for energy provision, to the benefit of the economy as well as the environment. The transformation to a high technology, energy secure region and country is an ongoing and dynamic process. The Regional Planning Guidelines also detail the potential for wind energy within the GDA.

Arklow is designated as a Large Growth Town II in the Hinterland Area, defined as smaller in scale (than Large Growth Towns II) but a strong active growth town, economically vibrant with high quality transport links to larger towns/city. Other strategic recommendations in the Regional Planning Guidelines of relevance include:

"PIR25 That reinforcements and new infrastructure are put in place by the key agencies, and their provision is supported in Local Authority policies, to ensure the energy needs of future population and economic expansion within designated growth areas and across the GDA can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

PIR26 Development Plans and Local Authorities support, through policies and plans, the targets for renewable generation so that renewable energy targets for 2020, and any further targets beyond 2020 which become applicable over the duration of the RPGs, are met."

"PIR32 Seek 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; and continued support by all key stakeholders of energy conservation measures." "PIR34 That a study is undertaken on wind energy potential by local authorities jointly in the GDA focusing on suitable areas for larger wind energy projects, role of micro wind energy in urban and rural settings and the potential for wind energy within industrial areas with the outcome presenting regionally consistent new land-use policies and objectives and associated development management guidance to potential projects."

The proposed development complies with the strategic objectives and recommendations of the Regional Planning Guidelines regarding the need for investment in renewable energy as well as meeting the growing energy demand in order to support the delivery of the economic and settlement strategies. Arklow is a key growth town in the GDA, and investment in its energy infrastructure is critical to realise the overall strategy for development in the region. The proposed development will therefore facilitate the expansion and growth envisioned in the Regional Planning Guidelines.

#### 2.4.2 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031 (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development to sustainably grow the Eastern and Midlands Region to 2031 and beyond.

The RSES is a significant evolution of regional policy making and replaces the Regional Planning Guidelines, which provided strategic policy and recommendations at a regional level with which both county and city development plans have to be consistent in policy making.

The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 – NPF and National Development Plan 2019-2027 and the economic policies of the Government by providing a long-term strategic planning and economic framework for the development of the Eastern and Midlands Region.

The RSES came into effect on 31<sup>st</sup> January 2020. The Eastern and Midland Region covers the administrative areas of twelve local authorities– Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, Fingal, South Dublin and Dún Laoghaire-Rathdown County Councils and Dublin City Council. The RSES sets out a 12-year strategic development framework for the Eastern and Midlands Region, with chapters dealing with Strategic Vision, Economy and Employment, Environment and Climate, Infrastructure including responding to climate change, biodiversity, green infrastructure, water and energy and implementation, monitoring and evaluation. The Strategy establishes a broad framework for development and the way in which the Region's society, environment, economy and the use of land should evolve.

The policies in the Strategy are structured under Regional Policy Objectives (RPOs). The project aligns with several objectives of the Strategy's RPOs.

Outlined in Chapter 7 of the Strategy -

"RPO 7.43: Climate Action Regional Offices and local authorities should consider the identification of critical infrastructure within their functional areas, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'future-proofing' services and to help to inform longer term adaptation planning and investment priorities."

The provision of infrastructure will be supported by the Strategy in order to facilitate a more distributed, renewables-focused energy generation system, harnessing offshore energy potential and connecting sites of optimal energy production to the major sources of demand.

Outlined in Chapter 10 of the Strategy -

"RPO 10.24: 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 proposed development will further these objectives of the Strategy as it will support the growth and integration of low carbon energy and renewable energy generation.

## 2.5 Local Planning Policy and Guidance

#### 2.5.1 Wicklow County Development Plan 2016-2022

The Wicklow County Development Plan 2016 – 2022 (Wicklow CDP) sets the overall strategy for planning and sustainable development within the administrative boundaries of County Wicklow. The Wicklow CDP through the policies and objectives contained therein, provides the direction for the future development of County Wicklow.

The Vision for County Wicklow is:

"For County Wicklow to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing the people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment."

The Wicklow CDP, has as one of its key strategic goals underpinning the vision of the plan:

#### *"Climate Change"*

To address the climate change challenge, as a plan dynamic, throughout the county plan, directly in the areas of flooding and renewable energy, and indirectly by integrating climate change and sustainable development into statements of plan policy, strategies and objectives." The strategic goal pertaining to infrastructure is:

"To protect and improve the county's transport, water, waste, energy and communications, and maritime infrastructure, whilst having regard to our responsibilities to respect areas protected for important flora, fauna and other natural features."

Arklow is categorised as a Hinterland Area Large Growth Town II, and on the third tier of towns in the County (behind Bray and Wicklow Town / Rathnew). Arklow town is projected to grow to 19,494 by 2022, 21,247 by 2025 and 23,000 in 2028. In terms of employment growth targets, the Wicklow CDP states that in order to achieve a jobs target ratio of 86%, an additional 4,661 jobs will be required between 2011 and 2028. In order to assist in achieving these growth targets additional investment in infrastructure is urgently required.

There are several objectives in the Wicklow CDP, which are supported by the proposed development:

#### **Objective CCE7**

"To facilitate the development of offshore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required."

#### **Objective CCE8**

"To support community-based wind energy projects."

#### **Objective CCE17**

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

Wicklow County Council has commenced the review of the Wicklow CDP and the preparation of a new County Development Plan for the period 2021 - 2027.

The proposed development complies with the objectives of the Wicklow CDP. The proposed development will provide additional renewable energy in Ireland and will support significant low carbon generation development. The proposed development has been designed and will be constructed with due consideration for social, environmental and cultural impacts.

#### 2.5.2 Arklow and Environs Local Area Plan 2018 – 2024

The Arklow and Environs Local Area Plan 2018 - 2024 (Arklow LAP) is the land use framework for guiding future development in the settlement of Arklow town. The Arklow LAP provides for and controls the physical, economic and social development of the settlement in the interests of overall common good and in compliance with environmental controls. The role of the Arklow LAP is to put in place the local framework within which development can occur.

Similarly, to the Wicklow CDP, the Arklow LAP contains a vision for the town infrastructure:

"To protect and improve the settlement's transport, water, waste, energy, communications and maritime infrastructure having regard to our responsibilities regarding the protection of the environment."

as well as a vision for climate adaptation:

"To address the climate change challenge, directly in the areas of flooding and renewable energy, and indirectly by integrating adaptation to climate change and sustainable development into the plan objectives."

The Arklow LAP also supports the core strategy outlined in the Wicklow CDP with regard to the need for renewable energy development including offshore wind:

"Energy from the offshore wind bank is brought ashore in Arklow and Arklow also has potential as a location for the landing of an underwater electricity interconnector from Wales. The plan facilitates the development of the expansion of electricity transmission and distribution."

It states the following in relation to electricity transmission and distribution:

"Arklow has a key role in electricity transmission and distribution with a number of high voltage electricity lines crossing the plan area, with the main electricity station at Killiniskyduff."

The proposed development complies with the vision and strategy outlined in the Arklow LAP, as this will provide expansion of the electricity transmission network in the area.

## 2.6 Conclusion

EU and national energy policy and climate action plans, discussed above, identify the need to further develop offshore renewable energy in Ireland as a key requirement to facilitate increased renewable electricity generation. The proposed development will provide significant renewable electricity generation, which will support the objectives of these plans and policies.

By providing additional renewable energy generation for the Irish electricity grid, the proposed development will also further the objectives of the EU Green Deal, the 2030 Climate and Energy Framework, the National Planning Framework, the Draft National Marine Planning Framework, the National Development Plan, the RSES for the Eastern and Midlands Region and the Wicklow CDP. The proposed development will enhance the security of the energy supply, underpin the decarbonising of energy generation in Ireland as well as bringing economic benefits.

# 2.7 References

The Department of Communication, Climate Action and Environment (December 2015) *Energy White Paper: Irelands Transition to Low Carbon Energy Future 2015-2030* 

Department of Housing, Planning and Local Government (2018) *Project Ireland* 2040: *National Planning Framework* 

Department of the Environment, Climate and Communications (DECC) (2020) *Ireland's National Energy and Climate Plan 2021-2030*.[online]. Available at: https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030 [Accessed January 2021]

Department of Public Expenditure and Reform (February 2018) National Development Plan 2018-2027

Department of Communication, Climate Action and Environment (2020) National Energy and Climate Plan 2021-2030

Department of Communication, Climate Action and Environment (2019) *The Climate Action Plan* 

Department of Communication, Climate Action and Environment (July 2017) *National Mitigation Plan 2017* 

Department of Communication, Climate Action and Environment (2014) Offshore Renewable Energy Development Plan

Department of Housing, Planning and Local Government (November 2019) National Marine Planning Framework

Dublin Regional Authority and Mid-East Regional Authority (2010) Regional Planning Guidelines for Greater Dublin Area 2010 – 2022

European Commission (February 2021) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Forging a climate-resilient Europe the new EU strategy on adaptation to climate change

European Commission (December 2019) European Green Deal

European Commission (2018) *Roadmap for the EU Strategy for Offshore Renewable Energy* 

Joint Oireachtas Committee for Climate Action, House of the Oireachtas (January 2020) *Consultation on Ireland's final integrated National Energy & Climate Plan 2021-2030* 

The Eastern and Midlands Regional Assembly (2019-2031) *Regional Spatial and Economic Strategy* (June 2019)

The Programme for Government (June 2020) Our Shared Future

Wicklow County Council (November 2016) Wicklow County Development Plan 2016-2022

Wicklow County Council (June 2018) *Arklow and Environs Local Area Plan* 2018-2024