Planning Application Documents

NISA

North Irish Sea Array

6. Planning Report

Statkraft

CIP Copenhagen Infrastructure Partners

GoBe APEM Group

ARUP

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1. Introduction

1.1 Introduction

North Irish Sea Array Windfarm Limited (Ltd) (hereafter referred to as 'the Developer') is proposing to develop the North Irish Sea Array (NISA) Offshore Wind Farm (hereafter referred to as the proposed development). The proposed development is an offshore wind farm located off the east coast of Ireland, off counties Dublin, Meath, and Louth. The proposed development is comprised of onshore and offshore infrastructure. The location of the proposed development is illustrated in Figure 1.1.

A planning application is being submitted to An Bord Pleanála under Section 291 of the Planning and Development Act 2000, as amended (the "Planning Acts") to carry out the proposed development.

The purpose of this Planning Report is to assist An Bord Pleanála in its assessment of the planning application relating to planning policy. The Planning Report is not a legislative requirement but is a supporting document of the application. This planning report therefore addresses:

- The legislation, policies and objectives for the time being of the Government, the Minister, planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of marine areas, cities, towns, or other areas, whether urban or rural
- The National Planning Framework, National Marine Planning Framework and any regional spatial and economic strategy for the time being in force
- Statutory and non-statutory pre-application consultation
- Any other reports or studies compiled and submitted in support of this application

1.2 Report Structure

The purpose of this Planning Report is to present the planning issues associated with the proposed development and to assist the Board in determining whether the proposed development is in accordance with the principles of proper planning and sustainable development, and accordingly whether statutory consent should be granted.

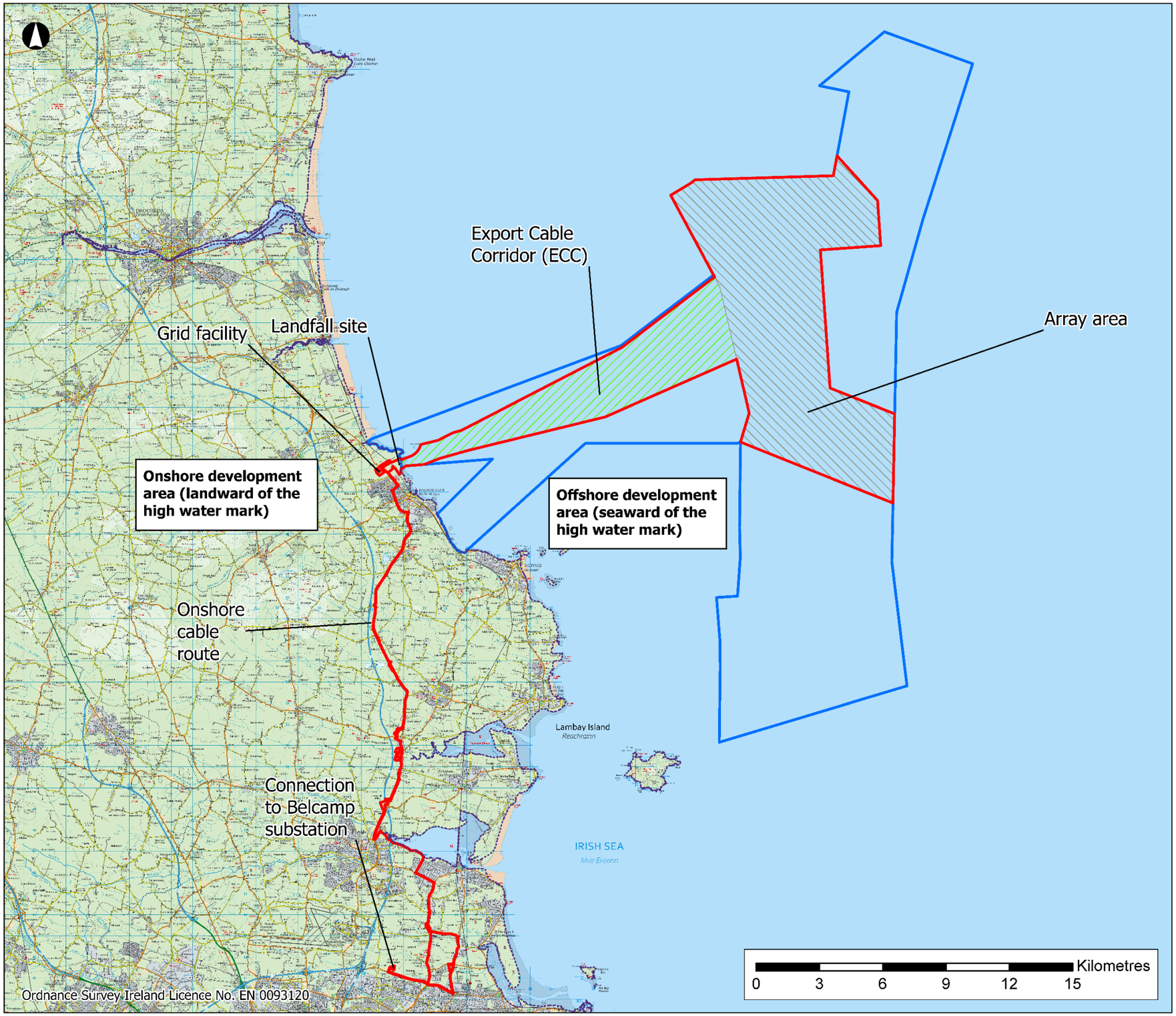
The structure of this Planning Report is as follows:

- Section 1: Introduction
- Section 2: Overview of the Proposed Development
- Section 3: Legislative Requirements
- Section 4: Non-Statutory Stakeholder Engagement
- Section 5: Planning History
- Section 6: Planning and Policy Context
- Section 7: Overall Conclusions
- Section 8: References
- Section 9: Glossary, Abbreviations and Acronyms

This Planning Report provides a reference to where further detail on planning policy matters and additional information may be found within the full planning application package.

The content of this report is derived from the planning application supporting documents, including the EIAR, plans, sections and elevations prepared in accordance with the Statutory Regulations and relevant planning policy documents.

If granted, the planning approval confers powers on the Developer to allow for the development of land and maritime area, and other rights to facilitate the construction, maintenance, improvement, and operation of the proposed development. These matters are addressed during the design and preparation of the Environmental Impact Assessment Report (EIAR). The lands are identified in the Drawings and Schedules and are assessed in the EIAR that accompanies the planning application and are not duplicated in this Planning Report.



Legend

- Proposed Development Boundary
- Maritime Area Consent (MAC) Boundary
- High Water Mark
- Array Area
- Export Cable Corridor

NISA
North Irish Sea Array

ARUP

Project
North Irish Sea Array Offshore Wind Farm

Figure Title
Proposed Development Location

Job No:	281240	**Figure No:**
Date:	May 2024	**1.1**
Scale:	1:175,000	
Status:	Issue	

Figure 1.1: Proposed Development Location

2. Overview of the Proposed Development

2.1 Project Overview

The proposed development is an offshore wind farm comprising of both onshore and offshore infrastructure. Having regard to the nature and extent of the relevant development and any other material consideration, the Developer requests An Bord Pleanála to specify a 10-year appropriate period within the meaning of section 40 of the Planning Acts, in respect of the proposed development, as provided for by Section 41(1) of the Planning Acts.

The proposed development boundary, within which the proposed development is located, will include offshore infrastructure off the coast of Counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas). The location of the proposed development is illustrated in Figure 1.1.

A high-level overview of the proposed development is provided below, with more detailed descriptions provided in Chapters 6 and 7 of the EIAR submitted in support of this application.

Offshore Infrastructure (located within and Array area and export cable export corridor (ECC)):

- Offshore wind turbine generators (WTGs) and their associated foundations
- Inter-array cables which will connect the WTGs to the Offshore Substation Platform (OSP)
- An OSP and associated foundations
- Offshore export cable(s) which will deliver the generated power from the OSP to the high-water mark (HWM) as defined by Ordnance Survey Ireland mapping, (the HWM being the transition point between the offshore and onshore infrastructure)

Onshore Infrastructure:

- Offshore export cable(s) from the HWM to the landfall transition joint bays (TJBs)
- Transition joint bays (TJBs) where the offshore and onshore export cables are joined
- Onshore export cable(s) from the TJBs to the grid facility
- A Grid Facility, comprising a compensation substation and Bremore substation, together within ancillary infrastructure.
- Onshore cable(s) from the grid facility to the Belcamp Substation
- A connection from the onshore cable(s) to the national electricity transmission network at Belcamp Substation

The landfall will comprise both onshore and offshore infrastructure, with the HWM being the point of transition between the two. The export cables come ashore and transition to onshore cables at the TJBs close to the shoreline at Bremore Bay beach in Bremore, north of Balbriggan, Co. Dublin. Figure 2.1 below illustrates the offshore and onshore infrastructure of the proposed development and the interface between each.

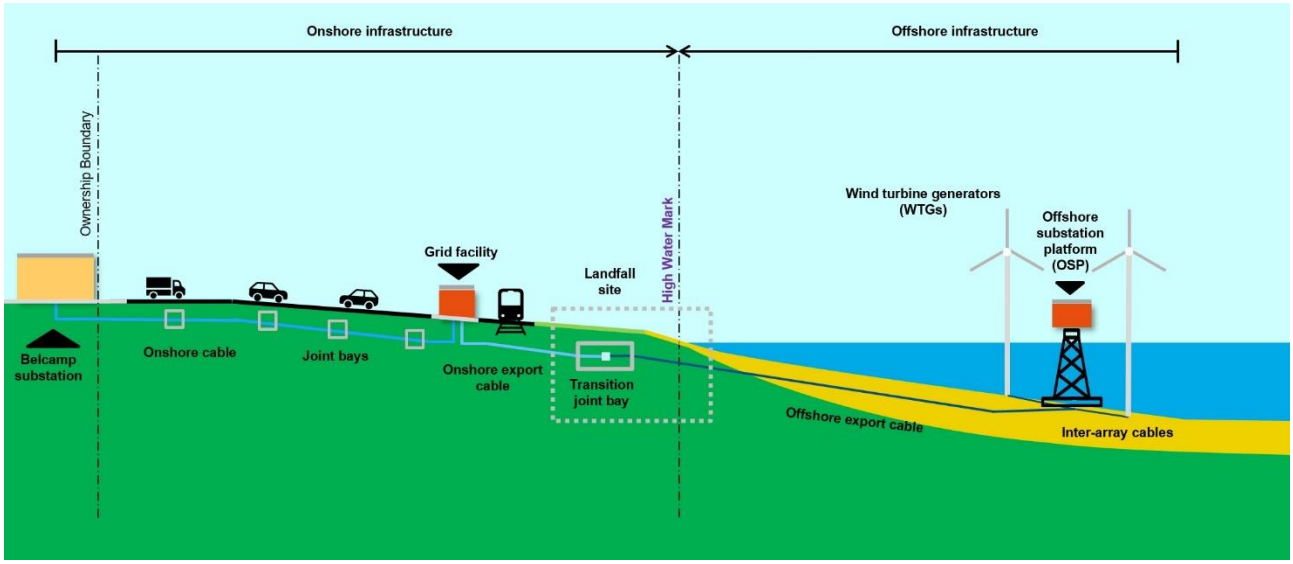


Figure 2.1: Infrastructure of the proposed development (not to scale)

2.2 Project Location

The proposed development boundary is the area within which all offshore and onshore infrastructure will be located and is the 'red line' boundary for the purposes of the consent application. For ease of reference, the area within the proposed development landward of the HWM associated with onshore infrastructure is referred to as the 'onshore development area' and the area within the proposed development boundary seaward of the HWM associated with offshore infrastructure is referred to as the 'offshore development area'. Both the onshore and offshore development areas are illustrated in Figure 1.1.

2.3 Profile of Applicant

2.3.1 Introduction

The Developer is a 50/50 joint venture between Statkraft Ireland Ltd and Copenhagen Infrastructure Partners P/S.

The Developer is the holder of a Maritime Area Consent (MAC) Ref: 2022-MAC-005, granted for the occupation of a maritime area for the permitted maritime usage, namely the construction and operation of an Offshore Wind Farm and associated infrastructure (including decommissioning and other works). Further details of the MAC can be found in Section 3.2.

2.3.2 Statkraft Ireland Ltd

Statkraft is a leading company in hydropower internationally and Europe's largest generator of renewable energy. Statkraft produces hydropower, wind power, solar power, gas-fired power, and supplies district heating. Statkraft is a global company in energy market operations. Statkraft has 5,700 employees in 21 countries.

Statkraft develops a wide range of renewable energy projects to facilitate the transition to decarbonisation and is currently working to develop offshore wind projects in Norway, UK, and Sweden. Statkraft also has previous experience of offshore wind development, having been involved in the development, construction, and operation of projects in the UK including Triton Knoll, Sheringham Shoal, Dudgeon, and Dogger Bank.

Statkraft entered the Irish market in 2018 and since then has tripled both its workforce and development portfolio. Statkraft Ireland Ltd. develops, owns, and operates renewable energy projects across the technologies of onshore wind, offshore wind, solar, battery storage and grid services.

2.3.3 Copenhagen Infrastructure Partners P/S

Founded in 2012, Copenhagen Infrastructure Partners P/S (CIP) today is the world's largest dedicated fund manager within greenfield renewable energy investments and a global leader in offshore wind.

The funds managed by CIP focus on investments in offshore and onshore wind, solar photo voltaic (PV), biomass and energy-from-waste, transmission and distribution, reserve capacity, storage and advanced bioenergy. CIP manages 11 funds and has to date raised approximately EUR 25 billion for investments in energy and associated infrastructure from more than 150 international institutional investors.

CIP has more than 400 employees and offices in Copenhagen, London, Hamburg, Utrecht, New York, Tokyo, Singapore, Seoul, Munich, Luxembourg, and Melbourne.

CIP has previous experience of offshore wind development, having been involved in the development, construction, and operation of projects in Germany, Taiwan, and the US. These included Veja Mate, Beatrice, Changfang & Xidao and Vineyward Wind.

CIP's project development activities are being led by CIP's development partner, Copenhagen Offshore Partners (COP). COP is a leading and experienced provider of project development, construction management, and operational management services to offshore wind projects.

2.4 Background to project

The background to the proposed development is firmly established in the context of its essential contribution to Ireland's committed offshore wind target, wider renewable energy targets, the need for an urgent response to the global climate emergency, whilst also providing an indigenous power source to ensure Ireland's security of energy supply, at an affordable price to the consumer. The need for the proposed development is urgent and important and in the long-term public interest for the reasons set out in this document.

The proposed development is essential for Ireland to meet its committed target of 5GW of installed offshore wind capacity by 2030. The proposed development is part of the Phase One offshore wind programme, has a Grid Connection Assessment issued by EirGrid and has secured subsidy support via the Offshore Renewable Energy Support Scheme (ORESS). Without the proposed development and others like it, there is no other credible means of the 5GW commitment being met by 2030.

As outlined in the Intergovernmental Panel on Climate Change (IPCC) 2023 report, the impact of climate change is evident across all aspects of the planet's environments. From the warming of the oceans to the disruption of weather patterns, the changes brought by climate change pose significant threats to Ireland and the world at large. The headline statement within the IPCC 2023 report notes; *'The pace and scale of climate action are insufficient to tackle climate change'.* As a result, there is an indisputable understanding and appreciation of climate change, and the role anthropogenic interference has played in exacerbating the harmful effects of climate change. Therefore, international, EU and Irish Government policies, as summarised in Section 6, are responding to the climate change challenge with binding targets to reduce greenhouse gas (GHG) emissions and develop renewable sources of electricity which are essential to mainstreaming effective and equitable climate action for both nature and people. In this regard, Ireland is a global leader on climate change, being one of the first countries globally to declare a climate emergency in 2019.

The proposed development will provide a significant source of offshore renewable energy (ORE) off the east coast of Ireland. The proposed development, which can be fully operational before 2030, will deliver clean electricity to contribute to Ireland's renewable electricity and GHG reduction targets which are clear in supporting the challenge of cutting emissions quickly to ensure a safer and sustainable world for all. The IPCC 2023 report is clear that the path forward for supporting GHG reductions is via the deployment of tried and tested technology options which are currently available. The proposed development will deploy fixed bottom offshore wind foundations, a tried and tested technology which can be deployed immediately to meet the requirements of Ireland's offshore wind targets by the year 2030 providing a clean and indigenous supply of power at a low cost to the consumer.

2.5 Community Benefit Fund

In accordance with the Offshore Renewable Energy Support Scheme (ORESS), it is a requirement that all renewable energy projects invest money into local areas[1]. In response, the developer has set up a Community Benefit Fund which will commence once the proposed development is in construction. This will be established and administered in accordance with ORESS 1 Community Benefit Fund Rulebook with an independent Fund Administrator appointed to facilitate and support the local community to maximise the opportunities of the Community Benefit Fund.

It is estimated that the funding will reach approximately €80 million, approximately €4 million per annum for 20 years. Not only will the fund give residents the opportunity to bring about transformative and positive change to their local community it will also allow communities to develop new and existing initiatives in their own areas, support existing local amenities and clubs, develop environmental and energy efficiency schemes, as well as the fishing industry. An independent adjudicator will be appointed to allocate and distribute funds to communities.

2.6 Project Objectives

The key objectives of the proposed development are to develop an environmentally acceptable and feasible offshore wind farm, contribute to the delivery of the Irish Government's legally binding renewable energy target of 5GW by 2030, deliver benefits on a local, regional, and national level and to limit the effects of global climate change. The objectives include:

- To deliver a fixed bottom offshore wind farm to contribute towards the Irish Governments target delivery of 5GW of offshore wind generation by 2030 and 80% of electricity to come from renewable sources by 2030
- To support the European carbon reduction targets of reducing emissions by 95% by the year 2050 to support the European Union in becoming carbon neutral
- To support the reduction in demand for imported energy from a volatile fossil fuel import market by improving Ireland's domestic energy generation capabilities through the deployment of offshore wind
- To deliver the proposed development in a safe, efficient, and environmentally sustainable manner within the constraints of technical feasibility and economic viability
- To deliver renewable electricity at low cost to the Irish consumer through the use of known, tried and tested technology (fixed foundation offshore wind)

This is a seminal moment in the delivery of offshore wind and achieving Ireland's target of at least 80% renewable electricity by 2030 and reaching net zero no later than 2050. The need for the proposed development is driven by key climate change, energy infrastructure, energy security, emission reductions and economic development targets at Irish and European levels. The proposed development is a pivotal component of the Programme for Government and the Climate Action Plan 2024 and reflects ambitions outlined in Offshore Renewable Energy Development Plan (OREDP) in 2014. In the absence of the proposed development, there is no plausible mechanism by which Ireland can meet binding climate and environmental targets for 2030 and beyond. With the urgency surrounding the climate crisis, it is imperative that these targets are achieved. As an essential contributor to achieving Ireland's offshore wind commitments, the need for the proposed development is clear and demonstrable.

2.7 The Role of Renewable Energy

2.7.1 Renewable Energy

The REPowerEU Plan introduced at EU level in May 2022 and Directive 2023/2413 establishes a framework to accelerate the deployment of renewable energy within the EU to respond to the disruption in the global energy market caused by Russia's invasion of Ukraine.

[1] https://www.gov.ie/en/publication/abb38-oress-1-community-benefit-fund-rulebook-for-generators-and-fund-administrators/

The Regulation applies for 18-month period from 29 December 2022 to 24 June 2024. REPowerEU reiterates how time sensitive and urgent the need to deploy renewables to address the climate emergency is stating that renewables are considered as an overriding public interest.

Scaling-up and speeding-up renewable energy in power generation, industry, buildings, and transport has been emphasised in REPowerEU to accelerate Europe's independence from fossil fuels, facilitate the green transition and reduce energy cost to the consumer over time.

In relation to the acceleration of clean energy, REPowerEU facilitates the green transition and encourages investment in domestic renewable energy to reduce reliance on energy imports. The proposed development is a mechanism by which Ireland can advance the framework provided by REPowerEU.

The Climate Action Plan (CAP) 24[2] and its predecessors provide the roadmap to achieve Ireland's legally binding targets of 51% GHG emissions reduction by 2030, relative to 2018 levels, and 'net zero' GHG emissions by no later than 2050. The Climate Acts provided for the setting of sectoral GHG emission ceilings to share the remaining GHG emissions equitably across the economy. Each sector of the economy such as electricity, industry, transport, built environment, agriculture, land use, land use change and forestry, was given GHG emission ceilings for 2025 and 2030.

For all sectors of the economy the sectoral GHG emission ceilings are largely dependent on decarbonisation and further electrification. Consequently, electricity generation was identified by the Government as the critical sector to achieve overall climate targets. In spite of this, at a time when the energy system is under severe pressure to ensure security of supply, and amid projections of rapid electricity demand growth over the coming decade, the electricity sector was set one of the smallest carbon budget allocations and the steepest emission reduction trajectory (75% reduction) of all sectors.

Considerable progress has been made in decarbonising the electricity sector, resulting in electricity emissions falling by 45% between 2001 and 2022[3]. However, with the current measures (set out in CAP 23) in place, emissions from the sector are not reducing quickly enough. The EPA's projections (in the National Inventory Report for 2022) are that the electricity sector will exceed the sector emission ceilings for 2025 and 2030. The EPA forecasts that, without additional measures, the emissions from the electricity sector will exceed the sector emission ceiling by circa 13% in the period 2021 to 2025, and by circa 43% in the period 2026 to 2030.

The proposed development will deploy tried and tested offshore wind technology in the use of fixed foundations. In addition, having secured both a Maritime Area Consent (MAC)[4] and Offshore Renewable Energy Support Scheme (ORESS) contract, the proposed development is at the forefront of Ireland's offshore wind energy industry. Once planning development permission is secured, the project can commence construction in 2026 and operations by 2030, ensuring the proposed development will provide renewable electricity to the national grid by 2030. The proposed development will make a significant contribution to the 5GW of offshore wind by 2030, which has been identified in CAP 2024 as essential to achieve the electricity GHG emissions sector ceiling.

2.7.2 Rising Demand of Electricity

As previously mentioned, the sustainable supply of renewable energy will be critical to decarbonise other sectors of society. As electrification of the transport, heat and industry sectors increases, the overall network demand for electricity will rise from the current levels of demand. Based on existing policies and strategies, of the total electricity demand forecasted for 2030, 80% renewable electricity, supplied by 22GW of wind and solar, will be needed to deliver abatement in the electricity sector.

[2] Department of the Environment, Climate and Communications, 2024, Climate Action Plan 2024, gov - Climate Action Plan 2024 (www.gov.ie) accessed February 2024

[3] Ibid page 156

[4] the MAC is a State consent which allows the Developer the right to occupy a part of the maritime area and the ability to subsequently apply for development consent within that maritime area.

However, CAP 2024 recognises that 22GW of wind and solar by 2030 will not be sufficient to achieve the emission reduction targets:

"Notwithstanding the above, the scale of projected electricity demand growth means that the delivery and integration of the renewables programme alone does not deliver required levels of emissions reduction.

Net Zero demand growth and calibrating renewable energy with demand will need to be pursued as a matter of urgency as a part of a longer-term decarbonisation pathway for the sector including for the third carbon budget.[5]*"*

CAP 24 identifies measures to meet the challenge:

"Achieving further emissions reductions between now and 2030 requires a major step up across three key measures:

- *Accelerate and increase the deployment of renewable energy to replace fossil fuels*
- *Deliver a flexible system to support renewables and demand*
- *Manage demand*[6]*"*

With the capacity to provide renewable electricity for between 500,000 to 700,000 homes, the proposed development is strategically situated close to an area of high electricity demand and high population density. The proposed development will be essential in accelerating and increasing the deployment of renewable electricity to meet Ireland's binding emission reduction targets.

2.7.3 Security of Supply

As a consequence of transitioning towards a low carbon energy system, conventional generation methods will eventually be phased out. These are predominantly represented by natural gas-powered generators for electricity and oil use for residential and business heating. Meeting the needs of the evolving system will be complex with approximately 20% of Ireland's generation capacity being phased out with a simultaneous increase in demand.[7]

Energy security of supply is considered to be the uninterrupted availability of energy at an affordable price. The SEAI's Energy in Ireland Report 2023[8] notes that Ireland imported 81.6% of its total primary energy requirement in 2022, whereas the average energy import dependency of all EU member states in 2020 was 57.5%. Ireland has a high energy import dependency because it imported all of its coal and oil products and 74% of its natural gas supplies. However, its import dependency on renewable energy is low, importing only 8.8% of renewable energy in 2022, most of which was biodiesel.

As the SEAI report also details. Ireland was highly dependent on fossil fuels in 2022. In that year, 85.8% of energy came from oil, natural gas, coal, and peat. In relation to renewables, 13% of Ireland's energy requirement in 2022 came from renewables. The remaining 1.2% of energy came from the use of non-renewable wastes and imported electricity across international interconnectors. Ireland's total energy demand in 2022 was 4.7% higher than in 2021, however, energy-related emissions were 1.7% lower.

In response to the Russian invasion of Ukraine in 2022, there was a renewed and revised urgency to the green transition and an increase in domestic energy sources across the EU. As a result, Ireland produced the Energy Security in Ireland to 2030 report[9]. Energy Security in Ireland to 2030 was published within the context of ensuring a stable transition to 2050.

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[5] Ibid page 163

[6] Ibid page 167

[7] EirGrid Shaping our Electricity Future

[8] SEAI (2023), *Energy in Ireland 2023* Energy-in-Ireland-2023.pdf (seai.ie) accessed February 2024

[9] Department of the Environment, Climate and Communications, 2023, *Energy Security in Ireland to 2030*, gov - Energy Security in Ireland to 2030 (www.gov.ie) accessed February 2024

To achieve security of supply, Energy Security in Ireland to 2030 assumes that Ireland's 2030 offshore wind energy targets will be met. The proposed development will be critical to this, as it will make a significant contribution to the offshore wind energy target.

The objectives of the Energy in Security to 2030 plan are underpinned by a broad range of policy initiatives that are currently in implementation (as described in the Legal and Policy Chapter).

The main conclusions detailed in the Energy Security in Ireland to 2030 report have been detailed as follows.:

- Energy security in Ireland will be facilitated by moving from an oil, peat, coal and gas-based energy system to an electricity-led system. Doing so, will maximise Ireland's renewable energy potential, flexibility and integration into Europe's energy systems.
- To secure electricity supply, Ireland's plans for an electricity-led system must focus on the addition of renewable generation, demand-side flexibility, new gas-fired generation as flexible back-up, interconnection and storage.
- The delivery of critical infrastructure is also vital to provide energy security and requires a strong legal framework and fully resourced State bodies. It is important that all opportunities to expedite energy infrastructure are pursued; and
- Finally, the risks Ireland faces in securing its energy are ever evolving, and so, it is imperative to ensure energy security is prioritised, monitored, and reviewed regularly going forward.

In order for Ireland to meet the Government's 80% renewable energy target by 2030[10], a significant amount of indigenous generation must be connected to the national grid. The proposed development is located adjacent to an area of high electricity demand (wider Dublin area) and will provide an essential contribution towards establishing energy security from a regional and national perspective. Further information on the proposed development's alignment to National and European policy on energy security is provided in Section 6 of this Planning Report.

2.7.4 The Need for Affordable Energy

The need for affordable energy in Ireland is at an all-time high, with the cost of living increasing, energy continues to be a major cost for consumers and businesses. The levelised cost of energy (LCOE) of offshore wind development has been declining since its inception, driven by a number of factors including advances in technology and maturation of the industry, including manufacturing, construction and operations and maintenance supply chain (IRENA, 2023[11]).

Whilst offshore wind in Ireland is a relatively new industry, the cost of delivering energy from this technology compared to other technologies is already highly competitive. The recent ORESS 1, the first offshore wind auction in Ireland, awarded successful offshore wind farm developers' contracts to provide electricity at the average weighted bid price of €86.05/MWh for a 20-year period. When compared to the average wholesale electricity price in Ireland over the 12 months prior which were over €200/MWh[12] , the projects successful at ORESS 1 will contribute to lower cost of electricity to the consumers in Ireland. The proposed development was one of the four successful offshore wind farm developments awarded a contract through ORESS 1 and will subsequently deliver a large proportion of affordable renewable electricity to Irish consumers.

[10] Department of the Environment, Climate and Communications, 2024, *Climate Action Plan 2024*, gov - Climate Action Plan 2024 (www.gov.ie) accessed February 2024

[11] https://www.irena.org/Publications/2023/Mar/Renewable-capacity-statistics-2023

[12] https://www.gov.ie/en/press-release/f2ac5-minister-ryan-welcomes-hugely-positive-provisional-results-of-first-offshore-wind-auction/

2.8 Additional Project Benefits

Whilst the principal and essential benefits of the proposed development are its significant contribution to Ireland's offshore wind, renewable and climate objectives and security of supply, there are a number of additional benefits which will be realised as the project progresses. These are outlined below.

2.8.1 Socio-Economic Overview

Alongside the need for renewable energy to reduce carbon emissions and improve climate resilience, there is also significant potential for socio-economic benefits.

SEAI has estimated that onshore and offshore wind generation could create over 20,000 direct installation operation and maintenance jobs by 2040[13]. With offshore wind in Ireland still emerging as an industry, there are added opportunities for scientific research alongside manufacturing, construction, and electrical generation. Additionally, wind developers will provide training to create the high-skilled workforce required for the installation and operational phases.

In the 2014 publication of the OREDP) two key goals were outlined to support the sustainable development of ORE resources across the economic spectrum: to harness the market opportunities presented by ORE to achieve economic development, growth, and employment; and to increase awareness of values, opportunities and societal benefits of developing ORE.

In 2023, the draft OREDP II was opened for consultation from 24 February 2023 to 20 April 2023. The draft OREDP II expanded on the goals embedded within the first OREDP. From a socio-economic perspective, OREDP II notes that the development of ORE in Ireland is crucial to deliver balanced regional development to fully benefit coastal, marine and island communities.

In 2024, the Department of Enterprise, Trade and Employment published Powering Prosperity: Ireland's Offshore Wind Industrial Strategy. The Strategy seeks to capitalise on the economic opportunities inherent in the 2050 target of 37GW of offshore renewable energy. Powering Prosperity establishes a pathway to 2030 to develop a strong domestic supply chain of industries and skills to create a resilient offshore renewable energy industry.

The proposed development directly aligns with the objectives of Powering Prosperity: Ireland's Offshore Wind Industrial Strategy and is a crucial development for the realisation of a successful, vibrant, and impactful offshore wind energy industry in Ireland. Powering Prosperity includes 40 actions which aim to build a strong and resilient offshore wind supply chain in Ireland, as well as exploring opportunities for Irish companies to play a major role in the development of offshore wind projects in Ireland and abroad.

The proposed development will support a large number of employment opportunities across its lifecycle both offshore and onshore. In addition, there will be opportunities for local, regional, and national supply chains to strengthen domestic economies. Further information on the socio-economic impacts is provided in Chapter 33 of the EIAR submitted in support of this application.

Locally, the project will establish multi-million investments on an annual basis to align with future Renewable Energy Support Schemes in which developers establish a fund of €2/MWh generated for community benefit projects. In the case of the proposed development, this is expected to amount to €4 million per annum for 20 years from the commencement of construction and will reach approximately €80 million. From a regional perspective, the proposed development will deliver clean renewable energy to between 500,000 and 700,000 homes.

Therefore, the proposed development will provide a critical opportunity for the local coastal communities to develop supply chains and skills networks to create a thriving, sustainable economy along the east coast of Ireland.

[13] SEAI (2011) *Wind Energy Roadmap 2011-2050*

2.9 Fulfilling Regional Demand

The offshore infrastructure of the proposed development is situated off the east coast of Counties Dublin, Meath, and Louth. This location was chosen as it is located within close proximity to areas of high population density and adjacent to the Dublin-Belfast economic corridor. This section examines strategies put forward by Ireland's Transmission System Operator (TSO) EirGrid, to guide the development of the electrical infrastructure required to meet Ireland's renewable energy targets.

2.9.1 Shaping Our Electricity Future

In response to Ireland's energy transition, EirGrid published the Shaping Our Electricity Future Roadmap in August 2021.

This report delivers an outline of a whole system approach for key electrical grid developments to ensure a secure transition to at least 70% renewables by 2030 (which was the target at that time). The study includes the target of 5GW of offshore wind generation which was included in CAP 2021.

Consultation in Ireland for this roadmap indicated a preference for a generation-led approach which puts clean electricity generation close to areas of high demand. In this approach, new renewable energy generation is situated where the grid is already developed which provides an efficient use of existing infrastructure and reduces network constraints. The same approach was favoured in Northern Ireland to complete an all-island approach delivered by a government policy to facilitate a generation-led strategy. A positive effect of this approach is that government expenditure is minimised with a reduced need for new transmission infrastructure. Under the generation-led approach, approximately 38 grid reinforcements will be required compared to 77, 46 and 41 reinforcements for the developer, technology, and demand-led approaches respectively.

The generation led approach was carried forward in the 2023 publication of Eirgrid's Shaping Our Electricity Future. The key objective of Shaping Our Electricity Future 2023 is to outline the steps required to ensure the electrical grid is ready for the increased target from 70% to 80% of renewable energy generation by 2030. To achieve this, Shaping Our Electricity Future 2023 recognises the need to focus development on the Dublin and Mid-East region of Ireland which is forecasted to see disproportionate demand growth compared to other regions in Ireland. The initial focus of the 2023 publication of Shaping Our Electricity future is on grid developments on the east coast to accommodate the introduction of large-scale offshore wind energy development. The grid developments required here are projected in line with the assumed renewable generation capacities in 2030 of 5GW of offshore wind, plus 2GW of offshore wind energy assigned to hydrogen production.

The proposed development is situated close to one of Ireland's major electricity demand and growth centres in the Greater Dublin Area and as such is essential in supporting Eirgrid's strategic delivery of grid upgrades to enhance the national electricity network.

2.9.2 Tomorrow's Energy Scenario

EirGrid's Tomorrow's Energy Scenario study outlines the long-term needs of the electricity grid to 2040. The study uses three scenarios (Centralised Energy, Delayed Transition, and Coordinated Action) to demonstrate how Ireland's energy transition may impact the electricity grid over time. The study identified that the regional distribution of offshore wind in all three scenarios is led by Dublin and the Mid-East in 2025 and 2030 with the two regions accounting for 100% of the offshore wind generation in 2025 and approximately 86% in 2030.

The three scenarios are intended to guide the development of the electrical grid infrastructure to meet the demand of energy users whilst fully decarbonising the generation of electricity. These scenarios were also aligned with regional distribution of large energy users which showed 100% of users in 2025 and 91% of users in 2030 situated in the Dublin and Mid-East region.

In each scenario outlined in Tomorrow's Energy Scenario, meeting the climate objectives will not be possible without offshore renewable generation in the Dublin and Mid-East regions. Therefore, the proposed development provides a critical source of renewable energy generation in an area of high demand and projected growth and supports the delivery of Eirgrid's strategic planning and as such supports Irish Government in the delivery of 80% renewables by 2030.

2.10 Summary of the Need for the Proposed Development

Climate change and the climate emergency are indisputable at a global, national and local scale. International treaties, and EU and Irish Government policy are responding to the climate change challenge with binding targets to reduce greenhouse gas (GHG) emissions and develop renewable sources of electricity. It is essential that the proposed development proceeds in order to ensure these targets are achieved. The proposed development will deliver a significant portion of the 5GW target for offshore renewable generation which is imperative for meeting the 2030 targets whilst improving energy security and reducing reliance on the costly import of energy. Without the proposed development, there is a real risk Ireland's committed target of 5GW installed offshore wind capacity will not be met.

Furthermore, the proposed development will generate significant opportunities by contributing to local employment, regional delivery of renewable electricity generation, and a secure indigenous source of electricity. The community benefit fund will also provide local communities with approximately €4 million per annum for 20 years. The fund is expected to give residents a significant opportunity to bring about transformative and positive change to their local community through investment in local amenities and clubs, develop environmental and energy efficiency schemes and improve local industries throughout the region. Additionally, the proposed development will deliver clean renewable energy to between 500,000 and 700,000 homes.

By aligning new generation with existing infrastructure located within an area of high demand, the proposed development directly conforms with existing policies, plans and strategies of the Irish and European governments whilst directly addressing the climate emergency and enhancing Irelands energy security of supply.

3. Legislative Requirements

3.1 Overview

In 2021, Ireland enacted the Maritime Area Planning Act[14] (hereafter referred to as the 'MAP Act') which effectively overhauled the system for consents in the maritime area. Prior to this legislation, consent was granted within the 12 nautical mile (nm) baseline pursuant to the Foreshore Acts and the consenting process for outside of the 12nm baseline was uncertain.

The MAP Act comprehensively transformed the legislative landscape to obtain consent for offshore renewable energy (ORE) in the maritime area by introducing a two-step consent process. The first step in that process is the requirement to obtain a Maritime Area Consent (MAC). Once a MAC is obtained an applicant can then submit an application for planning consent to An Bord Pleanála. The MAP Act also underpins an entirely new marine planning system and facilitates ORE development aligned with the National Marine Policy Framework (NMPF).

A MAC is the gateway into the planning system as MACs are required before any planning applications are made to An Bord Pleanála and the coastal local authorities. A MAC may be granted following assessment of the applicant and the proposed project, and only MAC holders can apply for development permission in the maritime area. A MAC is the right to occupy a part of the maritime area, conditional on securing other necessary approvals.

[14] Government of Ireland Maritime Area Planning Act Number 50 of 2021, Dublin 2021, https://www.irishstatutebook.ie/eli/2021/act/50/enacted/en/html, accessed September 2022.

The Planning and Development Act 2000[15], as amended (hereafter referred to as the "Planning Acts") is the primary legislation controlling the consent process for development on land in Ireland. These have recently been amended by the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023[16] the MAP Act 2021 and the Planning and Development Maritime and Valuation (Amendment) Act 2022[17].

3.2 Marine Area Consent (MAC)

Part 4 of the MAP Act 2021, as amended, provides for the issuance of MACs. All maritime usages, except those listed in Schedules 3 and 4 of the MAP Act, require a MAC for the purposes of such a usage.

"Maritime usage", in relation to the maritime area is defined in the legislation as:

"any activity, operation, works or development undertaken in that area for any purpose (including conservation), and includes—

(a) the construction or use, or both, of any infrastructure in that area associated with, or otherwise supporting, the activity, operation, works or development, and

(b) the maintenance of such infrastructure, and references in this Act to "proposed maritime usage" shall be construed accordingly".

It is only after a project is issued with a MAC that it can then take the first step in the new planning consent process. Following receipt of a MAC, projects are eligible to proceed to consult with An Bord Pleanála prior to applying for development consent from An Bord Pleanála. This process involves full statutory consultations and environmental assessment processes.

In 2020, the proposed development was deemed a "Relevant Project" by the Department of Housing, Local Government and Heritage (DHLGH) (previously known as the Department of Housing, Planning & Local Government) in the context of the forthcoming Marine Planning and Development Management legislation at that time. This designation allowed the proposed development to be one of the first projects considered for MAC under the new MAP Act 2021[18]. An application for a MAC was submitted by the Developer in June 2022, seeking the right to occupy a part of the maritime area and the ability to subsequently apply for development consent within that maritime area to An Bord Pleanála under Section 291 of the Planning Acts (this application).

The Developer is the holder of a MAC granted on 23 December 2022 (Reference No 2022-MAC-005) for the occupation of a maritime site for the purposes of the proposed development. As outlined in the Developer's MAC, the permitted maritime usage is for "the construction and operation of an Offshore Wind Farm and associated infrastructure (including decommissioning and other works required on foot of any Development Permission for such Offshore Wind Farm".

3.3 Pre-application consultations with An Bord Pleanála and Design Flexibility

3.3.1 Pre-application Consultation under Section 287

Pre-application consultation with An Bord Pleanála is required under section 287 of the Planning Acts before an application for consent for the proposed development can be made under section 291 of the Planning Acts. On 5th January 2023, the Developer submitted its request to enter into pre-application consultation with An Bord Pleanála under section 287(1) of the Planning Acts (ABP-315801-23).

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[15] Government of Ireland Planning and Development Act 2000, Dublin 2000, https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html. Accessed September 2022.

[16] Government of Ireland *Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023*, Dublin 2023, https://www.irishstatutebook.ie/eli/2023/act/26/enacted/en/html accessed March 2024

[17] Government of Ireland *Planning and Development Maritime and Valuation (Amendment) Act 2022*, Dublin 2022 https://www.irishstatutebook.ie/eli/2022/act/29/enacted/en/pdf, accessed September 2022

[18] Government of Ireland *Maritime Area Planning Act Number 50 of 2021*, Dublin 2021, https://www.irishstatutebook.ie/eli/2021/act/50/enacted/en/html, accessed September 2022

There were four meetings held during the Section 287 pre-application process (30th May 2023, 21st September 2023, 2nd November 2023, and 14th December 2023). An Bord Pleanála closed the Section 287 pre-application consultations on 2nd February 2024.

3.3.2 Pre-application Consultation under Section 287A and Design Flexibility Opinion

Section 287A of the Planning Acts provides for a developer to enter pre-application consultation with An Bord Pleanála in relation to flexibility for certain details of a proposed development. Following Section 287 pre-application consultation meetings with An Bord Pleanála on 30 May 2023 and 21 September 2023, the Developer was invited to submit an application for a design flexibility opinion under section 287A of the Planning Acts.

When requesting an opinion under section 287A, a prospective applicant is required to provide a description of:

- the details of the proposed development that were unlikely to be confirmed at the time of the proposed application
- the circumstances relating to the proposed development that indicate that it may be considered appropriate that the proposed application be made and decided before the final details are confirmed

On 26 October 2023, the Developer submitted this application to An Bord Pleanála (ABP-316332-23). A copy of the application by the Developer under section 287A is provided in Appendix A of this report. A meeting during the Section 287A pre-application process was held on 2nd November 2023.

On 2 February 2024, An Bord Pleanála issued its opinion on design flexibility under section 287B, signed 30 January 2024 (the "DF Opinion"). This DF Opinion was subsequently clarified by way of letter dated 4 April 2024 and updated by way of decision pursuant to Section 146A of the Planning Acts on 16 April 2024. A copy of the DF Opinion is provided in Appendix B of this report.

Form 22 *"Supplementary information to accompany an application accompanied by an opinion on flexibility"* as required by An Bord Pleanála has been completed by the Developer and is included in Appendix C of this report.

The DF Opinion confirms the details of the proposed development for which design flexibility has been accepted by An Bord Pleanála. These details may therefore be confirmed after the Developer's proposed application under section 291 has been made. The DF Opinion includes flexibility for the following aspects of the proposed development:

- Turbines – model, number, and dimensions (tip height, rotor diameter, rotor swept areas, nacelle height and hub heights)
- Turbine foundations – type and pile dimensions
- Offshore substation platform – foundation type and dimensions (height above sea level, length, and width)
- Siting of infrastructure – fixed location with limit of deviation (turbines, foundations, export cable and offshore substation platform location)
- Offshore cabling – subsea cable size and subsea cable length

An Bord Pleanála determined that it was appropriate to allow for design flexibility in the Developer's proposed planning application because of "*ongoing advances in technology and the recognition of the need to install the most efficient and effective project elements in relation to Items 1 to 5 above*".

Following receipt of the DF Opinion and closure of the pre-application consultation process (also confirmed on 2 February 2024), the Developer was then in a position to submit its planning application under section 291 of the Planning Acts.

3.4 Development Consent under Section 291 and 293 of the Planning Acts

The planning permission system now extends into the entire maritime area with development subject to a single comprehensive environmental assessment by the relevant planning authority. Under the Planning Acts, An Bord Pleanála shall independently assess planning applications including environmental assessments for certain strategic infrastructure projects listed in Schedule 8 of the Planning Acts, including offshore energy projects. This includes the proposed development. An Bord Pleanála has established a new Maritime Directorate with responsibility for the assessment of planning applications for offshore development.

Following closure of the pre-application consultations with An Bord Pleanála under section 287(1) (and where requested, receipt of an opinion as to flexibility under section 287B of the Planning Acts), an application for planning permission under section 291 of the Planning Acts can be made. The planning application must be consistent with any opinion issued in accordance with section 287B.

The Developer is now making an application for the proposed development under section 291 of the Planning Acts, consistent with the DF Opinion.

3.4.1 Requirements under Section 291

Section 291 of the Planning Act provides, *inter alia*, that an application under this chapter is made in writing and accompanied by prescribed documentation. Generally, this includes such information, plans and drawings as prescribed, together accompanied with the following if required by An Bord Pleanála:

- an Appropriate Assessment Screening Report and, if applicable, Natura Impact Statement and
- the information required under Schedule 7A of the Planning and Development Regulations 2001 and, if applicable, an Environmental Impact Assessment Report

An Bord Pleanála may refuse to consider an application under this section where it is of the opinion that the submitted application and supporting documentation are inadequate or incomplete.

Before an application is made for consent, the Planning Acts provides inter alia for the notification (including publishing in newspapers), depositing, serving (including on owners and occupiers) and making available for purchase (on payment of a fee not exceeding the reasonable cost of making copies or extracts) a copy of the application and accompanying documentation and that same are available to be viewed electronically on a website and at such places as specified.

Details of the pre-application consultations carried out with An Bord Pleanála and prescribed bodies are included as Appendix 12 to the Planning Application form. These consultations included *inter alia*:

- Fingal, Dublin City, Meath and Louth County Councils
- Relevant statutory bodies
- Fisheries organisations
- Coastal and marine bodies
- Utility and service providers

Notifications of the Developer's intent to submit a planning application were also issued to the following transboundary consultees:

- The Isle of Man – The Department of Infrastructure
- Northern Ireland – The Department for Infrastructure Planning
- Wales – Energy Division of the Welsh Government
- Scotland – Marine Directorate Licensing Operations Team and
- The United Kingdom - Department for Levelling Up, Housing and Communities - Environmental Assessment, Planning Reform and Housing Quality

3.4.2 Decision Process under Section 293

Whenever an application is made, and before deciding whether or not to grant permission under Section 291, An Bord Pleanála shall not grant a permission that would materially contravene the National Marine Planning Framework (NMPF) or a maritime spatial plan unless it is satisfied that—

- the proposed development is of strategic, economic, or social importance to the State and
- the NMPF or the maritime spatial plan, as the case may be, contains objectives that conflict with one another or that are ambiguous with regard to their application to the proposed development

The Developer has prepared an NMPF compliance document. This is included in Appendix D of this report.

As per Section 293 of the Planning Acts, An Bord Pleanála shall also in the making of a decision in relation to an application under Section 291 have *inter alia* regard to:

a. the marine planning policy statement,

b. guidelines issued under section 7 of the Maritime Area Planning Act 2021,

c. guidelines issued under section 28,

d. any regional, spatial and economic strategy of a regional assembly,

e. the development plan of any coastal planning authority,

f. any local area plan applicable to a part of the functional area of any coastal planning authority

g. any submissions or observations made in relation to the application for permission concerned,

h. any environmental impact assessment report or Appropriate Assessment,

i. the likely effects of the proposed development on the environment or any European site,

j. any submissions or observations from prescribed bodies,

k. any report prepared, or recommendation made in relation to the application for permission in accordance with section 146,

l. any recommendation or record referred to in subsection (7) of section 291 in relation to the application for permission,

m. Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008, and any enactment or instrument under an enactment that gives effect thereto,

n. land-sea interactions within the meaning of Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014,

o. objectives of maritime spatial planning, and

p. principles of proper planning and sustainable development.

Following such considerations, An Bord Pleanála may:

- grant the permission subject to such modifications (if any) to the proposed development as it may specify
- grant the permission in respect of part of the proposed development concerned subject to such modifications (if any) to that part as it may specify or
- refuse to grant the permission

An Bord Pleanála may also attach conditions to any permission granted.

3.5 Requirement for EIA

3.5.1 Statutory Requirement for EIA

The Council Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU (the EIA Directive) requires that public and private projects that are likely to have significant effects on the environment are subject to an environmental impact assessment prior to development consent being given.

The requirements of the EIA Directive have been transposed into Irish law with the enactment of a number of implementing legislative measures, including the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296/2018) ("the EIA Regulations") with effect from 1 September 2018. The relevant provisions of the Planning and Development Act 2000, as amended ("the Planning Acts") and the Planning and Development Regulations 2001, as amended (the "Planning Regulations") have been amended by the EIA Regulations.

Article 5 and Annex IV of the EIA Directive and Schedule 6 of the Planning Regulations specify the information to be contained in an EIAR in relation to this proposed development.

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 Planning Regulations. The class under Schedule 5 that is relevant to the proposed development is:

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.

As the offshore wind farm will have more than 5 Wind Turbine Generators (WTGs) and will have a total output greater than 5MW, it will exceed the threshold and therefore a mandatory EIA is required.

As an EIA is mandatory, EIA Screening (process to determine whether an EIA is required for the proposed development) is not required.

3.5.2 EIA Process

Article 1(2)(g) of the EIA Directive states that:

"Environmental impact assessment" means a process consisting of:

(i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);

(ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;

(iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;

(iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examination; and

(v) the integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a."

North Irish Sea Array Windfarm Limited (Ltd) is the 'Developer' proposing the proposed development and An Bord Pleanála is the 'competent authority' that will undertake the EIA examination and decide whether to grant consent for the proposed development under the Planning Acts.

3.6 Requirement for AA

3.6.1 Habitat Directive

The Habitats Directive (92/43/EEC) and the associated Birds Directive (2009/147/EC) are transposed into Irish legislation by Part XAB of the 2000 Act and the Birds and Natural Habitats Regulations 2011.2. The Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) was adopted in 1992 and is transposed into Irish Law by the European Communities (Birds and Natural Habitats) Regulations 2011 as amended (S.I. No. 355 of 2015) (the Habitats Regulations) and the Planning and Development Act (as amended).

The Habitats Directive provides the framework for the legal protection to ensure the conservation of a wide range of rare, threatened, or endemic animal and plant species throughout the European Union. The Birds Directive (Conservation of Wild Birds Directive (79/409/EEC) aims to protect all 500 wild bird species naturally occurring in the European Union.

The provisions of the Habitats Directive seek to maintain or restore the favourable conservation status (FCS) of habitats and species designated within protected areas, known as European sites. European sites consist of Special Areas of Conservation (SAC) and Special Protection Areas (SPA), which together provide for the protection and long-term survival of Europe's most valuable and threatened species and habitats. Collectively, these sites comprise the Natura 2000 network of protected sites across Europe.

The requirement for AA is set out in Article 6(3) of the Habitats Directive (92/43/EEC). If a project is likely to have a significant negative effect on a European site, either alone or in-combination with other plans or projects, it must undergo an AA process.

3.6.2 Screening and Outcomes

In view of the potential for the proposed development to affect Natura 2000 site(s) and as the proposed development is not connected with or necessary for the management of a Natura 2000 site, screening for AA is required. A Supporting Information for Screening for AA report has been prepared by GoBe Consultants Ltd on behalf of the Developer. This document presents the information required for a Stage 1 AA to be carried out by the competent authority, An Bord Pleanála, to determine whether or not the proposed development, either alone or in combination is likely to have significant effects on European sites. The document concludes that it has not been possible to rule out likely significant effects and therefore the proposed development must proceed to Stage 2. A Natura Impact Statement (NIS) has been prepared to assist the competent authority, An Bord Pleanála, in carrying out the AA.

3.7 Requirements for Water Framework Directive Assessment

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (hereafter referred to as the Water Framework Directive (WFD) was established in 2000 by the European Union (EU), to provide a framework for the protection of groundwater and surface water bodies. As a member state of the EU, Ireland is obliged to transcribe the WFD into relevant regulations. All new developments in Ireland that may have an impact on the water environment are required to comply with objectives of the WFD, under European Communities Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272/2009 (as amended).

A WFD assessment was therefore required to support this application, and to support the development of the EIAR (see Appendix 11.1 of Volume 9: Offshore Water Framework Directive Compliance Report, and Appendix 22.2 of Volume 10: Onshore Water Framework Directive Compliance Report of the EIAR submitted in support of this application). The purpose of the assessment is to demonstrate compliance of the proposed development with the objectives of the WFD, by ensuring proposed activities during construction, operation and decommissioning do not result in adverse effects to designated water bodies (or WFD sensitive areas). This assessment also reviews whether the proposed development would jeopardise the potential for WFD water bodies to achieve good chemical or ecological status, whether already achieved or as a future objective.

4. Non-Statutory Stakeholder Engagement

4.1 Introduction

Extensive engagement has been undertaken with a range of stakeholders during the development of the EIAR and statutory consent application in order to:

- Provide information on the proposed development
- Ascertain and understand the views of stakeholders
- Seek input from stakeholders on the design, construction, operation, and decommissioning assessment aspects of the proposed development

The Developer committed, from the outset, to provide information throughout all design development phases of the proposed development. To this end, the Developer established a systematic, documented process to manage the stakeholder consultation from the outset of the development process to bring forward proposals that would be appropriate in the context of the local area. At a very early stage in the design of the proposed development, the Developer initiated a stakeholder engagement campaign with statutory bodies, the public and other relevant organisations. The project team has conducted wide stakeholder consultation throughout the development process to include Fingal, Dublin City, Meath and Louth County Councils, relevant statutory bodies, fisheries organisations and other interested coastal and marine bodies, utility and service providers, and landowners as well as residents and businesses in proximity to the proposed development.

4.2 Pre-Application Public Consultation

Public participation has been an integral part of the iterative design of the proposed development from the outset. Public consultation was carried out to inform the public and stakeholders of the progress of the project from a very early stage and to seek feedback and participation. The project team has undertaken a comprehensive consultation and engagement process with stakeholders, landowners, and members of the public throughout the evolution of the proposed development.

The primary objective of the public consultation process has been to provide opportunities for members of the public and interested stakeholders (including fisheries stakeholders, community groups, public representatives) to contribute to the planning and design of the proposed development and to inform the development process. Public participation in the planning and design of the proposed development began in 2019 through on-the-ground engagement and information and media campaigns.

The early involvement of the public and stakeholders ensured the views of various groups, individuals and stakeholders were taken into consideration in the proposed development and in the preparation of the project to ensure that the development is appropriate, in the context of the local area.

The promotion of the public consultation events included advertising in local newspapers, within public buildings and on the proposed development's website (www.northirishseaarray.com). These included printed and electronic advertisements in the paper's weekly circulations, on their websites and leveraging their social media channels.

The events displayed all information that was available on the virtual consultation room (which ran concurrently with the in-person events, as further detailed below) with a minimum of six project team members present at any one time to ensure appropriate technical expertise was present at the event to address any concern a guest may have had.

All consultations undertaken and a summary of observations are detailed further in Appendix 1.2 of Volume 8 of the EIAR submitted in support of this application, as well as in Appendix 12 to the Planning Application.

5. Planning History

5.1 Introduction

A desk study was conducted to source publicly available information on historical planning applications within the proposed development boundaries, using the following searches of relevant websites, planning databases and other available sources.

- An Bord Pleanála website
- Local authority websites (Dublin City Council & Fingal County Council)
- National Planning Application Database (https://data.gov.ie/dataset/national-planning-applications)
- The EIA Portal (https://www.housing.gov.ie/planning/environmental-assessment/environmentalimpact-assessment-eia/eia-portal)

5.1.1 Landfall site

There is no record of existing relevant planning applications within the proposed development boundary at the Landfall site. Iarnród Eireann have however been preparing to submit a Railway Order application to An Bord Pleanála for the DART+ Coastal North project, which would, if approved, intersect the Landfall site along the railway line. DART+ Coastal North proposes the electrification of the railway line from Malahide to Drogheda MacBride Station. The proposed development cable route will cross under the railway line from the Transition Joint Bays to the R132 and would not be expected to interfere with any railway modifications. The DART+ application is expected to be submitted in Q2 of 2024.

Fingal County Council have also been preparing to submit an application to An Bord Pleanála for the Fingal Coastal Way Greenway, which is proposed to follow the railway line where it intersects the proposed development redline boundary between the Landfall site and the Grid Facility site. The Fingal Coastal Way application is expected to be submitted by Q3 of 2024.

To the south of the Landfall site, there is also a recent Fingal County Council Part 8 application for Bremore Regional Park Development (PARTXI/006/20). While Bremore Regional Park development does not intersect with the proposed development, it is located directly adjacent to it as seen in Figure 5.1 below.

Figure 5.1: NISA Boundary in relation to Bremore Regional Park Development

5.1.2 Grid Facility

There is no record of relevant planning applications within the proposed development boundary at the Grid Facility site.

5.1.3 Onshore Cable Route

The onshore cable route will be routed along public roads as much as possible apart from the connection point to the existing transmission network (at Belcamp substation) and where it is necessary to divert the route off the road for technical reasons (such as under the M1 and at watercourse crossings). Along the cable route a considerable number of historical planning applications intersect with the boundaries of the proposed development, the majority of which are minor residential applications or historical utility installations. Due to the nature of these applications in relation to the cable installation, they have not been listed here.

Other identified recent applications for infrastructure projects which intersect the proposed development boundary and may be of material consideration are as follows:

- Harry Reynold Road, Cycle and Pedestrian Route Project (PARTXI/001/20, permission granted Nov 2020): This scheme is predominantly located along Harry Reynolds Road and Hamilton Road in Balbriggan, Co Dublin and includes numerous measures to improve pedestrian and cyclist facilities in the area. This development is currently under construction.
- Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order (ABP- 314724-22, submitted Sept 2022): Potential interaction of this project and the proposed development at Estuary Roundabout in Swords. This application is not yet decided.
- Greater Dublin Drainage Project (ABP-312131-22, submitted Dec 2021): Potential interaction of this project and the proposed development where the Greater Dublin Drainage Project would cross from East to West under the Malahide Road (R107), or the Drumnigh Road (R124).
- BusConnects Clongriffin to City Centre Core Bus Corridor Scheme (ABP-313182-22, approved with conditions Jan 2024): This scheme is located within the proposed development red line boundary at the junction of R139 and Malahide Road (R107) (Northern Cross).
- ESB MetroLink 110kV Cable (ABP-317831-23, submitted Aug 2023): Potential colocation of both proposed projects for approximately 2.4km along the Malahide Road (R107) from Baskin Lane to the junction with the R139 and along the R139. This application has not yet been decided. Note two options for the proposed development onshore cable route are included – one along the R107 and one via the R124 –the alternative route providing flexibility to ensure integration with other existing utilities infrastructure including the planned route for power cables associated with the Metrolink 110kV project. The route via the R124 would add approximately 2km to the overall cable route (hence the cable route will be approximately 33 – 35km).

5.1.4 Connection at Belcamp Substation

Where the onshore cable route connects to the national electricity transmission network at Belcamp Substation, there are a number of historical planning applications within the site boundary. Of significance are two projects:

- New electricity transmission infrastructure at the existing ESB Belcamp substation (F23A/0040): The planning application states the development will expand facilities at the existing substation with an additional 220 kV Gas Insulated Switchgear (GIS) 16 Bay Building north of the existing station compound. This application was granted permission in December 2023, and is not yet under construction.
- East Meath – North Dublin Grid Upgrade (ABP-319422-24): The proposed development consists of the installation of an underground cable circuit, approximately 37.5km in length, connecting Woodland Substation (400kV) in the townland of Woodland in County Meath, and Belcamp Substation (220kV) in the townlands of Clonshagh and Belcamp in Fingal. The application was submitted in April 2024 and subject to approval, construction is predicted to commence in Q2 2026 and finish in Q4 2029.

6. Planning and Policy Context

6.1 Introduction

This section presents a summary of the policy context at international, European, national, regional and local level for the proposed development. The planning and policy documents discussed in the following sections are listed in Table 6.1.

Table 6.1: Planning and Policy Documents

International Policy
United Nations Framework Convention on Climate Change
Kyoto Protocol
Paris Agreement
European Policy
European Marine Spatial Planning Directive (2014/89/EU)
Marine Strategy Framework Directive 2008/56/EC
Promotion of the use of energy from renewable sources Directive (EU) 2018/2001
Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999
The European Green Deal
2020 EU Strategy for Offshore Renewable Energy
European Climate Law Regulation 2021/1119
8th European Environmental Action Programme
Council Regulation (EU) 2022/2577
REPowerEU
European Directive 2023/2413
European Wind Power Action Plan
European Wind Charter
National Marine Area Policy
Marine Planning Policy Statement
National Marine Planning Framework
National Planning Policy and Guidance
Offshore Renewable Energy Plan 2014
Offshore Renewable Energy Development Plan Interim Review May 2018
National Energy and Climate Plan 2021 – 2030
Climate Action and Low Carbon Development Acts 2015 to 2021
Climate Action Plan 2024
Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction
Project Ireland 2040: National Planning Framework (NPF)
National Development Plan
Programme for Government: Our Shared Future
Powering Prosperity – Ireland's Offshore Wind Industrial Strategy
The National Implementation Plan for the Sustainable Development Goals
Energy Security in Ireland to 2030

National Hydrogen Strategy
Draft Offshore Renewable Energy Future Framework Policy Statement
Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System
Regional Policy
Eastern and Midland Regional Spatial and Economic Strategy (RSES) 2019-2031
Local Policy
Fingal County Development Plan 2023-2029
Dublin City Development Plan 2022-2028
Meath County Development Plan 2021-2027
Louth County Development Plan 2021-2027
Lissenhall East Local Area Plan 2022
Kinsaley Local Area Plan 2019-2025
Flemington draft Local Area Plan (under consultation)

6.2 International

The international policies which are relevant to the proposed development are outlined below.

6.2.1 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. One hundred and fifty-four countries ratified the international treaty in 1992 as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. 198 countries have now ratified the Convention and are called Parties to the Convention.

The UNFCCC set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the UNFCCC outlines how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gas emissions The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

Amongst these negotiations, the Kyoto Protocol of 1997 and the Paris Agreement of 2015 shaped the responsibilities of the UNFCCC Secretariat in its current state. A key responsibility of the UNFCCC is the organisation of the Conference of Parties (COP) which are hosted annually. Ireland is currently considered an Annex I party within the UNFCCC which legally obligates Ireland to reduce overall greenhouse gas (GHG) emissions[19].

Therefore, the proposed development directly aligns with the UNFCCC by reducing GHG emissions in the Irish energy sector.

6.2.2 Kyoto Protocol

COP3 took place in 1997 and resulted in the 11 December 1997 introduction of the Kyoto Protocol. Following a complex ratification process, the Kyoto Protocol was formally ratified on 16th February 2005 when it was ratified by 192 parties around the world. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total GHG emissions of 8% below 1990 levels in the period 2008 to 2012.

[19] Annex I parties include the industrialised countries that were members of the OECD in 1992

The Kyoto Protocol served to operationalise the UNFCCC by committing industrialised countries and economies in transition to limit and reduce emissions in line with individually agreed targets. As a member of the UNFCCC, Ireland signed the Kyoto Protocol on 29th April 1998 and ratified it on 31st May 2002[20]. As a result, Ireland agreed to a legally binding target to limit the increase in its GHG emissions relative to 1990 levels to no more than 13% for the period of 2008-2012. Ireland was successful in meeting the Kyoto Protocol targets under the EU burden-sharing agreement.

On 8th December 2012, the Doha Amendment to the Kyoto Protocol was adopted to cover a second commitment period for members for the period of 2013-2020. However, this was superseded by the Paris Agreement of 2015.

6.2.3 Paris Agreement

The Paris Agreement is a legally binding international treaty on climate change adopted by 196 Parties at the Paris climate conference (COP21) on 12th December 2015. It was ratified by all Parties and entered into force on 4th November 2016. The Paris Agreement establishes a global framework to limit global warming to well below 2°C and to pursue efforts to limit it to 1.5°C. Ireland signed the Paris Agreement on 22 April 2016 and ratified the Agreement on 4th November 2016[21].

A further commitment under the Paris Agreement Is for countries to submit national Climate Action Plans to demonstrate national commitments to limit GHG emissions (see Section 6.5.2).

Furthermore, in COP 26, additional agreements were made by the Paris Signatories to phase out coal power globally and accelerate the transition to 100% zero emission cars and vans by 2040. Following COP 27, the Sharm el-Sheikh Implementation Plan was published on 20th November 2022 which reaffirmed the commitment to limiting global temperature increases to 1.5 degrees Celsius against pre-industrial levels. Finally, in 2023, COP 28 explicitly addressed the need to end global reliance on fossil fuels and to triple the renewable energy capacity to 2030.

In the recent COP 28, Ireland committed ongoing financial support of the new Climate Account of the Central Emergency Response Fund and financing of the new Loss and Damage Fund once established. Ireland further committed to doubling the climate finance to at least €225 million by 2025 which demonstrates ongoing commitment to investing in energy access and low carbon development globally.

The proposed development will contribute a significant amount of renewable electricity to reduce the emissions within the Irish energy sector and is essential to facilitate Ireland in the compliance with the binding climate targets laid out in the Paris Agreement.

6.3 European

Following on from its commitments under the UNFCCC, Kyoto Protocol and Paris Agreement, over the years the EU has proposed progressively more ambitious targets for the reduction of GHG emissions and the increased use of renewable energy. These are outlined in the following sections.

6.3.1 European Marine Spatial Planning Directive (2014/89/EU)

Directive 2014/89/EU[22] established a framework for maritime spatial planning aimed at promoting the sustainable growth of maritime economies, the sustainable development of marine areas and the sustainable use of marine resources. Directive 2014/89/EU required member states to make marine spatial plans for their seas. The spatial plans should be prepared by 31 March 2021. Directive 2014/89/EU specified the range of activities that must be included in the marine spatial process and plan.

[20] UNFCCC, *Ireland*, https://unfccc.int/node/61086 (accessed May 2023)

[21] *Ibid*

[22] Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0089

Ireland made a marine spatial plan for its seas, the National Marine Planning Framework (NMPF), which is summarised in Section 6.4.2, in response to Directive 2014/89/EU. The proposed development will comply with the NMPF, as detailed below and within the NMPF Compliance Document (Appendix D).

6.3.2 Marine Strategy Framework Directive 2008/56/EC

In 2008, the EU adopted the Marine Strategy Framework Directive (MSFD) to maintain clean, healthy, productive, and resilient marine ecosystems. The MSFD directly contributes to the ambitions of the European Green Deal (refer to Section 6.3.5) with specific emphasis on the EU's Biodiversity Strategy for 2030 and the Zero Pollution Action Plan.

The MSFD aims to guide sustainable development in the marine environment by establishing environmental guidelines for the protection of marine ecosystems and biodiversity. Its aim is to achieve a good environmental status of all the EU's marine waters and to protect the resources on which socio-economic and social activities rely upon.

The DHLGH is responsible for the implementation of the MSFD in Ireland, which has been carried out in a number of implementation cycles. These cycles guide member states to undertake an assessment of their marine environments to determine a 'Good Environmental Status'. The second cycle of the MSFD reporting is underway with public and stakeholder participation incorporated into each aspect of the MSFD implementation.

In providing a source of renewable energy in an effort to tackle rising global temperatures, the proposed development will contribute to the management of rising sea temperatures and will indirectly support the objectives of the MSFD.

6.3.3 Promotion of the use of energy from renewable sources Directive (EU) 2018/2001

Directive (EU) 2018/2001[23] on the promotion of the use of energy from renewable sources (revised Renewable Energy Directive (RED II)) imposed the requirement that Member States set national contribution targets in order to achieve the EU's overall renewable energy targets. RED II became legally binding on January 1, 2021, and amended the previous Renewable Energy Directive (RED I) (2009/28/EC).

RED II was introduced as part of the Clean Energy for all Europeans package and acts as a key policy to drive European growth in renewable energy. The policy objectives and binding targets outlined within RED II were introduced to ensure that the EU would remain a global leader in renewables and meet the binding targets introduced in the Paris Agreement (See Section 6.2.3).

RED established a new European-wide binding target for Member States to collectively ensure that the share of energy from renewable sources in the EU's gross final consumption of energy in 2030 is at least 32%, an increase from the 2020 target of 20% outlined in RED I. Directive 2018/2001 included a clause for a possible upwards revision by 2023 and an increased 14% target for the share of renewable fuels in transport by 2030.

Annex I of RED II states that Ireland's target share of energy from renewable sources in gross final consumption of energy by 2020 was 16%[24]. Ireland's actual share of energy from renewable sources in 2020 was 13.5% which meant Ireland was obligated to acquire statistical transfers of renewable energy from other Member States to compensate[25].

The European Commission agreed in March 2023 to raise the EU's binding renewable energy target for 2030 under the RED to a minimum of 42.5%, up from the previous target of 32%. The increased target brings the EU closer to the delivery of the targets embedded in the European Green Deal and the REPowerEU objectives.

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[23] European Union, *Directive (EU) 2018/2001 of the European Parliament and of The Council of 11 December 2018 on the promotion of the use of energy from renewable sources* Official Journal of the European Union 21.12.2018, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001&from=EN, accessed August 2022

[24] Ibid

[25] SEAI, *Renewables*, https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/renewables (accessed May 2023)

The proposed development will be operational by 2030 and will contribute significantly to the generation of renewable energy which will support Ireland in meeting its 42.5% final consumption target. In contributing a substantial supply of renewable energy to the Irish energy mix, the proposed development will facilitate future success in meeting climate targets.

6.3.4 Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999

Regulation 2018/1999[26] applies to the five dimensions of the EU Energy Union Strategy, which requires Member States to prepare an integrated national energy and climate plan to demonstrate how the targets for the five dimensions, including the 32% target for the share of energy from renewable sources, will be achieved. The national energy and climate plans must be prepared every 10 years, with the first plan covering the period 2021 to 2030.

Each Member State must describe in its national plan the main existing and planned policies and measures to achieve the objectives of its plan, including, where applicable, measures providing for regional cooperation and appropriate financing at national and regional level, including mobilisation of Union programmes and instruments.

Each Member State must also provide a general overview of the investment needed to achieve the objectives, targets and contributions set out in its national plan, as well as a general assessment on the sources of that investment.

The National Energy and Climate Plan (NECP) 2021 – 2030[27] was published in 2019 to comply with the requirement of Regulation (EU) 2018/1999, referred to above. An updated draft of the NECP was submitted to the European Commission in December 2023 with a final version due for submission in June 2024. The proposed development will facilitate the achievement of the renewable energy targets within the NECP by providing a significant source of offshore renewable energy.

6.3.5 The European Green Deal

The European Green Deal[28], 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 Green Deal outlines the investments needed and financing tools available. It also explains how to ensure a just and inclusive transition. The main elements of the Green Deal include increasing the EU's climate ambition for 2030 and 2050 and supplying clean, affordable, and secure energy.

In relation to increasing the EU's climate ambition for 2030 and 2050, the Green Deal provides a plan to increase the EU's GHG emission reductions target for 2030 to at least 50% and towards 55% compared with 1990 levels. One of the core objectives of the European Green Deal to achieve these targets is *"to develop the full potential of Europe's offshore wind energy".*

[26] Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (Text with EEA relevance.) https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ:L:2018:328:TOC&uri=uriserv:OJ.L_.2018.328.01.0001.01.ENG

[27] Government of Ireland. *National Energy and Climate Plan 2021-2030, Dublin 2019* https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030/ (accessed January 2024)

[28] European Commission, *Communication from the Commission The European Green Deal* COM (2019) 640 final, Brussels, 2019, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2019%3A640%3AFIN#:~:text=Brussels%2C%2011.12.2019%20COM%20%282019%29%20640%20final%20COMMUNICATION%20FROM,for%20the%20European%20Union%20%28EU%29%20and%20its%20citizens . Accessed August 2022

Table 6.2: Summary of EU Green Deal Climate and Energy Targets

EU Green Deal Objectives	EU Green Deal Targets to 2030
Cut in greenhouse gas emissions (from 1990 levels)	>55%
Share for renewable energy in total energy mix	38% - 40%
Renewable electricity as % of electricity generation	65%
Improvement in energy efficiency	36%

In relation to the supply of clean affordable and secure energy, the Green Deal states that the clean energy transition should involve and benefit consumers. The Green Deal further stipulates the necessity for offshore wind production in developing regional cooperation between Member States in decarbonising the EU's energy system to achieve carbon neutrality by 2050.

The proposed development will fully comply with and support the European Green Deal through the generation of new renewable electricity generation from the deployment of offshore wind. By effectively lowering Ireland's GHG emissions in the electricity sector, the proposed development will also directly align with the European Green Deal objectives.

6.3.6 2020 EU Strategy for Offshore Renewable Energy

In 2020, the EU launched its *Strategy for Offshore Renewable Energy*[29]. The aim of the strategy is to make offshore renewable energy a core component of Europe's energy system by 2050.

The strategy assesses the EU's contribution to the offshore renewable energy sector and addresses bottom-fixed and floating offshore wind and ocean energy technologies. It reviews the offshore renewable energy potential of the EU sea basins and considers the challenges of increasing existing offshore wind generation capacity by establishing a clear ambition for an installed capacity of 60GW of offshore wind by 2030, and 300GW by 2050.

The proposed development, as a Phase 1 project, will be one of the first commercial scale offshore wind projects deployed in Irish waters. The project will unquestionably comply with and support the EU Strategy for Offshore Renewable Energy by providing a new source of offshore renewable wind energy in Ireland which will contribute to making offshore renewable energy a core component of Ireland energy system by 2050 and as such, will support the continued delivery of a renewable energy system throughout Europe.

6.3.7 European Climate Law Regulation 2021/1119

The European Climate Law (Regulation (EU) 2021/1119)[30] commits the EU and its Member States to make continuous progress towards adaptive capacity, strengthened resilience and reduced vulnerability to climate change. Regulation 2021/1119 sets the long-term vision that the EU will be a climate resilient society by 2050 by becoming climate neutral with reinforced adaptive capacity and minimised vulnerability to climate impacts.

It also establishes the intermediate target of reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels. The targets of 55% reduction by 2030 and climate neutrality by 2050 are legally binding within the EU Climate Law. It further includes measures to monitor progress of member states' implementation of National Energy and Climate Plans (see Section 6.5.2). Written into the law are progress reviews every five years in line with the global stocktake exercise under the Paris agreement.

The proposed development will help Ireland implement the EU Climate Law by delivering clean electricity. The proposed development will be critical to lowering Ireland's GHG emissions in the electricity sector which will directly align with the EU Climate Law's objectives.

[29] European Commission *Communication From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions An EU Strategy to harness the potential of offshore renewable energy for a climate neutral future*, Com (2020) 741, Brussels 2020 https://ec.europa.eu/energy/sites/ener/files/offshore_renewable_energy_strategy.pdf, accessed August 2022

[30] Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law')

6.3.8 8th European Environmental Action Programme

Successive general Environment Action Programmes (EAPs) have guided the development and coordination of EU environment policy and provided the framework for EU action in the field of the environment and climate since 1973. The 8th such programme was published in April 2022[31] and replaces the 7th EAP to become a 10-year programme to keep the 2050 vision of becoming climate neutral on track.

The EAP sets out its priority objectives and identifies the enabling conditions necessary to attain those priority objectives. It establishes a monitoring framework to measure the progress of the EU and its Member States towards the attainment of the priority objectives and a governance mechanism to ensure attainment of those priority objectives.

The overall long-term priority objective of the EAP is *"that by 2050 at the latest, people live well, within the planetary boundaries in a well-being economy where nothing is wasted, growth is regenerative, climate neutrality in the Union has been achieved and inequalities have been significantly reduced.*"[32]

To achieve this objective, the EAP requires a swift and predictable reduction of GHG emissions in line with the EU's climate and environmental objectives whilst ensuring a just transition which leaves no individual behind.[33]

The proposed development will provide an essential contribution to the reduction of GHG emissions in Europe and thus directly aligns with the objectives of the EAP.

6.3.9 Council Regulation (EU) 2022/2577

On 22 December 2022, the European Council adopted Regulation (EU) 2022/2577. The Regulation established a framework to accelerate the deployment of renewable energy across the EU to phase out dependence on Russian fossil fuels. Faster deployment of renewables is considered necessary to strengthen the EU's security of supply and to immediately and structurally reduce the demand for fossil fuels in the power, heating/cooling, industry, and transport sectors.

The Regulation also aimed to accelerate the permit-granting procedures for renewable energy projects as well as for grid and infrastructure projects, that are needed to integrate renewable energy into the electricity system, as detailed in Article 6 of the Regulation.

6.3.10 REPowerEU

In May 2022 the EU issued the REPowerEU Plan[34] to respond to the disruption in the global energy market caused by Russia's invasion of Ukraine. REPowerEU aims to rapidly reduce EU dependence on Russian fossil fuels and simultaneously accelerate the green transition across Europe. The green transformation will aid strengthening economic growth, security, and climate action for Europe and its partners.

The measures outlined in the REPowerEU plan aim to implement energy savings, accelerate roll-out of renewable energy to replace fossil fuels in homes, industry, and power generation, and diversify energy supplies. REPowerEU is backed by financial and legal measures in order to build new energy infrastructure and systems that Europe needs.

Scaling-up and speeding-up of renewable energy in power generation, industry, buildings, and transport has been emphasised in REPowerEU to accelerate Europe's independence from Russian fossil fuels, facilitate the green transition and reduce energy cost to the consumer over time.

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[31] European Commission, *Decision (EU) 2022/591 Of The European Parliament And Of The Council of 6 April 2022 on a General Union Environment Action Programme to 2030*, Official Journal of the European Union, 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022D0591&from=EN accessed August 2022

[32] Ibid 30

[33] Ibid

[34] European Commission, *REPowerEU Plan*, Brussels, 2022 EUR-Lex - 52022DC0230 - EN - EUR-Lex (europa.eu) accessed February 2024

The European Commission has proposed to increase the headline 2030 target for renewables from 40% to 45% under the Fit for 55 packages.[35]

Table 6.3: REPowerEU Targets

REPowerEU Objective	REPowerEU Target 2030
Cut in greenhouse gas emissions (from 1990 levels)	>55%
Share for renewable energy in total energy mix	45% by 2030
Renewable electricity generation	1236GW by 2030

In relation to the acceleration of clean energy, REPowerEU facilitates the green transition and encourages investment in domestic renewable energy to reduce reliance on energy imports. Several short-term measures in REPowerEU related to the proposed development have been summarised as follows; The necessity for new energy partnerships with reliable suppliers, including future cooperation on renewables and low carbon gases are essential for the success of measures within REPowerEU. There is also a growing necessity for a rapid roll out of solar and wind energy projects, combined with renewable hydrogen deployment, as these deployments can save around 50 billion cubic metres of natural gas imports across Europe.

The need to transition away from natural gas was re-emphasised on 19 January 2023, when EU countries agreed to adapt new long-term goals for the deployment of offshore renewable energy up to 2050 in each of the EU's five sea basins. In total, these goals encompass 111GW of total offshore capacity by 2030, and 317GW by 2050[36].

The proposed development will deliver offshore renewable energy into the Irish energy mix. Offshore wind is a source of clean, affordable, reliable, energy and as such, the proposed development will support Ireland's contribution to RePowerEU target of 45% renewable energy in the total energy mix by 2030.

6.3.11 European Directive 2023/2413

Directive (EU) 2023/2413 (otherwise known as RED III) on the promotion of the use of energy from renewable sources, amends Directive (EU) 2018/2001. Expanding on the 2018 Directive, Directive 2023/2413 sets a binding target for the share of energy from renewable sources in the EU of 42.5% by 2030, with the aim of securing 45%.

Directive 2023/2413 notes that the energy sector contributes 75% of total GHG emissions in the EU. Through the reduction of associated GHG emissions, renewable energy will directly contribute to tackling additional environmental challenges including the loss of biodiversity and pollution. Directive 2023/2413 notes that member states should be able to combine different non-fossil energy sources by taking into account their specific national circumstances to achieve climate neutrality by 2050.

The proposed development will directly contribute to the achievement of Directive 2023/2413 targets by utilising Ireland's offshore resources to provide a significant source of offshore renewable energy by 2030.

6.3.12 European Wind Power Action Plan

The European Commission published the European Wind Power Action Plan to navigate the future growth of the European wind industry in order to meet the EU target of at least 42.5% share of energy from renewable sources by 2030. The European Wind Power Action Plan ensures that the clean energy transition will go hand-in-hand with industrial competitiveness to continue delivering the continued success story of European wind power.

[35] European Commission, *REPowerEU Plan, Brussels, 2022* REPowerEU (europa.eu) accessed February 2024

[36] https://energy.ec.europa.eu/news/member-states-agree-new-ambition-expanding-offshore-renewable-energy-2023-01-19_en#:~:text=Member%20States%20agree%20new%20ambition%20for%20expanding%20offshore%20renewable%20energy,-%C2%A9iStock%2FBenGrasser&text=EU%20countries%20have%20agreed%20on,achieved%20by%202030%20and%202040. (Accessed February 2024)

The European Wind Power Action Plan aims to accelerate the deployment of wind installations to meet the 2030 target for renewable energy, and notes that whilst a record 16GW of wind power installations were added in 2022, it remains well below the 37GW/year[37] required to achieve the 2030 targets. From an offshore wind perspective, the European Wind Power Action Plan notes that to meet the 111GW target committed to by the EU Member States from the 2022 installed capacity of 16.3GW, 12GW of offshore wind installations are required per annum to meet this objective. That represents a target of 10 times more than the 1.2GW installed in 2022.

The proposed development represents a critical step as it will provide a significant contribution to the 12GW per annum target required for the European Union to meet the objectives established in RED III under the European Wind Action Plan.

6.3.13 European Wind Charter

The European Wind Charter was published in December 2023 which builds upon the European Wind Power Action Plan above. The European Wind Charter seeks to develop and improve the necessary conditions for the realisation of at least 42.5% share of energy from renewable sources by 2030 as set out in RED III (see Section 6.3.11).

The key commitments outlined in the European Wind Charter are:

- Ensure a sufficient, robust, and predictable pipeline for the deployment of wind energy
- Improve, simplify, and provide consistency in the design of auctions for wind energy
- Ensure that business processes, governance, products, and services offered by the undersigning wind sector representatives satisfy high qualitative standards
- Improve the predictability of demand and supply through clear auctions
- Contribute to a fair and competitive international environment including through the Foreign Direct Investment Regulation
- Scale up wind equipment manufacturing capacity in EU

Ireland signed up to the European Wind Charter and pledged indicative targets of 20GW of offshore wind energy by 2040. The proposed development will contribute a significant proportion of this target and therefore will facilitate the Government of Ireland in meeting the obligations inherent in the signing of the European Wind Charter.

6.4 National Marine Area Policy

6.4.1 Marine Planning Policy Statement

The Marine Planning Policy Statement[38] was published in 2019 on a non-statutory basis, pending the introduction of legislation in 2020 which provided for the preparation, adoption, and review of statutory marine planning policy statements on six-yearly cycles. The purpose of the statement was to set out the core principles to inform the new marine planning and development management process.

The new marine planning and development management process comprised three elements, a marine spatial plan, a new marine development management system and new marine enforcement systems. The marine spatial plan is now called the NMPF Framework.

[37] European Commission, *Commission sets out immediate actions to support the European wind power industry*, Brussels 2023, https://ec.europa.eu/commission/presscorner/detail/en/ip_23_5185, accessed April 2024

[38] Government of Ireland *Marine Planning Policy Statement*, Dublin 2019, https://www.gov.ie/en/publication/3e262-marine-planning-policy-statement/, accessed September 2022

6.4.2 National Marine Planning Framework

The NMPF[39] published in 2021 is Ireland's first comprehensive marine spatial plan since Harnessing Our Ocean's Wealth in 2012. The publication of the NMPF satisfies the requirements of Article 4 of Directive 2014/89/EU, the Maritime Spatial Planning Directive, that required each member state to publish and implement a marine spatial plan by 2021. The NMPF is also one of the three elements of the new marine planning and development management process, proposed in Marine Planning Policy Statement, mentioned above.

The NMPF sets out, over a 20-year horizon, how Ireland intends to use, protect, and enjoy its seas. The NMPF sits at the top of the hierarchy of plans and sectoral policies for the marine area.

The NMPF covers all of Ireland's maritime area, an area of 490,000 km^2 from high water mark seaward to the limits of the Irish EEZ. The NMPF is a single plan for the entire Irish marine area. It is envisaged that sub-national (regional and local) plans will be part of future iterations. Throughout the NMPF, climate change is a central consideration and the NMPF sets out the forward planning framework within which Ireland's offshore renewable energy targets will be realised.

Under Section 30 of the MAP Act 2021, as part of their functions and decision-making processes, public bodies involved in authorising any marine usage are required to adopt such measures, consistent with the body's functions, as are necessary to secure the objectives of the NMPF.

In the NMPF, 32 overarching marine planning policies (OMPPs) are grouped under three high level objectives and 19 policy groupings. 16 key sectors/activities are identified. Sectoral objectives and policies (SMPPs) are stated for each of these key sectors/activities.

The overarching marine planning policies are a broadly-based series of environmental and sustainability policies. The environmental policies arise from the requirement, imposed by Directive 2014/89/EU, the Marine Strategy Framework Directive, and Directive 2000/60/EC and the Water Framework Directive, to achieve and maintain 'Good Environmental Status' for marine waters and the coastal, estuarine and inland waters covered by the Water Framework Directive. The overarching marine planning policies have very wide application and apply to all proposals capable of having impacts in the maritime area, i.e., both proposals that would be in the maritime area, and to proposals that would be outside of the maritime area, e.g., on land, but capable of having an impact in the maritime area.

ORE is one of the sectors addressed in the NMPF and the key sectoral policies are set out in chapter 13 of the NMPF.

The NMPF has seven objectives and 11 planning policies in relation to Energy - Offshore Renewable projects. The objectives are:

- *"Support the development of ORE in Ireland as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy*
- *Increase the sustainable ORE use of our extensive marine resource in an efficient and co-ordinated manner identifying, where possible, potential for synergies and opportunities for multi-use of our shared maritime area.*
- *Support Ireland's decarbonisation journey through increased use of ORE while delivering significant and sustained benefits, import substitution, fiscal return, national and local economic development and technology learning*
- *Support the strategic growth of the ORE industry recognising the potential to derive benefits particularly for Ireland's coastal communities*
- *Provide enhanced security of energy supply for Ireland in the short and medium term, in accordance with the Climate Action Plan*

[39] Government of Ireland *National Marine Planning Framework*, Dublin 2021 https://www.gov.ie/en/publication/60e57-national-marine-planning-framework/, accessed September 2022

- *Develop a robust, effective transparent consenting process to ensure appropriate environmental protections are built-in, while enabling sustainable ORE developments to progress*
- *Ensure good regulatory practices in ORE installation and generation, including decommissioning of existing facilities, at end of life, according to international best practice"*[40]

The NMPF supports the establishment of Ireland as a world leader in ORE deployment, highlighting the importance of ORE in Ireland's decarbonisation journey.

The proposed development supports the objectives of the NMPF in that it will contribute to the decarbonisation of electricity generation and will enhance the security of energy supply in Ireland.

An Bord Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the NMPF. Further information on the proposed development's compliance with the NMPF and the embedded policy points is provided in Appendix D.

6.5 National Planning Policy and Guidance

6.5.1 Offshore Renewable Energy Development Plan

6.5.1.1 Offshore Renewable Energy Plan 2014

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. In this way, the OREDP provides a framework for the sustainable development of Ireland's offshore renewable energy resources.

The Offshore Renewable Energy Development Plan (OREDP) identifies the 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
- creating jobs in the green economy

The proposed development will comply with the current OREDP by providing an offshore renewable energy source to the National Electricity Transmission Network providing electricity for Irish homes. The proposed development will increase indigenous production of renewable energy to enhance energy security (see Section 6.5.8) and will generate significant employment opportunities in the green economy (see Volume 5, Chapter 33 of EIAR supporting this application for further information on employment opportunities).

6.5.1.2 Offshore Renewable Energy Development Plan Interim Review May 2018

The objective of the interim review was to assess progress on the key policy actions set out in the OREDP and identify the challenges that had emerged since its publication in 2014. The Interim Review did not make any changes to the OREDP. Its aim was to chart progress on the OREDP. It identified the challenges that had emerged and identified the areas that needed to be prioritised or required attention.

[40] Ibid 120

6.5.2 Climate Action Policy

6.5.2.1 National Energy and Climate Plan 2021 – 2030

It is a requirement of Regulation (EU) 2018/1999 for all member states to establish integrated 10-year National Energy and Climate Plans.

The National Energy and Climate Plan 2021 – 2030 was published in 2019 to comply with the requirement of Regulation (EU) 2018/1999 to fulfil this obligation and committed Ireland to decarbonising the economy by establishing sectoral roadmaps. A draft update of the NECP was submitted to the European Commission in December 2023. A final, updated submission will be made to the European Commission in June 2024. The NECP 2021-2030 introduced the concept of 70-by-30, a target of 70% renewable electricity (RES-E) generation by 2030. The Programme for Government proposed this to increase to 80%. This increase was subsequently reflected in a revised target for 80% RES-E generation in the 2021 revision of the CAP alongside an increased target for ORE from 3.5GW to 5GW by 2030.

The proposed development will directly align with the objectives of the NECP 2021-2030 by providing a significant source of renewable energy to meet the Irish targets for offshore renewable energy and RES-E generation.

6.5.2.2 Climate Action and Low Carbon Development Acts 2015 to 2021

The Climate Action and Low Carbon Development Act 2015[41] requires the relevant Government minister to prepare and submit to the Government a national low carbon transition and mitigation plan. Within 24 months of the passing of the Climate Action and Low Carbon Development Act the relevant minister, was required to prepare a national climate change adaptation framework with updates required every five years. The Climate Action and Low Carbon Development Act also provides for the making of sectoral adaption plans by the relevant ministers, the establishment of a Climate Change Advisory Council and the submission to the Houses of the Oireachtas of an annual transition statement.

The Climate Action and Low Carbon Development (Amendment) Act 2021[42] amends the Climate Action and Low Carbon Development Act 2015 (together, the Climate Acts). Section 3(1) of the Climate Acts provides for the national climate objective as follows:

"*The State shall, so as to reduce the extent of further global warming, pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy (in this Act referred to as the "national climate objective").*"[43]

The Climate Acts commit Ireland to a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030[44], compared to 2018 levels.

6.5.2.3 Climate Action Plan 2024

The Climate Action Plan 2024 (CAP 2024) is the third update to Ireland's Climate Action Plan, prepared in compliance with the Climate Acts. It was approved by Government on 20 December 2023. The CAP 2024 was accompanied by an Annex of Actions.

The CAP 2024 builds upon the previous CAPs (2019, 2021 and 2023) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The CAP 2024 provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Acts.

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[41] Government of Ireland *Climate Action And Low Carbon Development Act 2015*, Number 46 of 2015, *https://www.irishstatutebook.ie/eli/2015/act/46/enacted/en/html*,*accessed August 2022*

[42] Government of Ireland *Climate Action and Low carbon Development (Amendment) Act 2021*, Number 32 of 2021, https://www.irishstatutebook.ie/eli/2021/act/32/enacted/en/pdf, accessed August 2022

[43] Ibid 8

[44] Ibid 14

As outlined in the CAP 2024, current and future key actions are required:

- Rapid and significant reductions in GHG emissions are required if we are to meet the 2015 Paris Agreement Goals
- The European Green Deal commits to delivering net-zero GHG emissions at EU level by 2050 with
- Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050
- While the benefits of transitioning to a low carbon economy are increasingly being recognised, action to reduce emissions must be significantly accelerated in the period to 2030
- Ireland must act now to secure an economy-wide low carbon future for all its citizens

In relation to energy, the CAP 2024 notes transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation in Ireland. The same is needed to strengthen the electricity grid and meet the demand and flexibility needs required for, but not limited to the following challenges:

- Increasing renewable generation to supply 80% of demand by 2030 through the accelerated expansion of onshore wind and solar energy generation, developing offshore renewable generation, and delivering additional grid infrastructure
- Transforming the flexibility of the electricity system by improving system services and increasing storage capacity
- Developing micro and small-scale generation, as well as community projects, through actions such as grant funding and enabling small-scale production to participate in energy markets

The CAP 2024 includes key targets for offshore wind energy. The national target for offshore wind energy is to have at least 5GW operational by 2030.[45]

The proposed development will prioritise local supply chains and will provide clean, secure and local electricity to between 500,000 -700,000 homes in an area of peak demand around Dublin and will represent up to 14% of the 5GW offshore wind target set for 2030. Without the generation of offshore renewable energy provided by the proposed development, there is a very strong chance that Ireland will miss meeting the binding renewable energy objectives set for 2030.

6.5.2.4 Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction

Ireland's publication of the Long-term Strategy on Greenhouse Gas Emissions Reductions[46] (hereafter referred to as the 'Emissions Strategy') in 2023 lays out the indicative pathways towards achieving climate neutrality beyond 2030 for 2050. The Emissions Strategy was established to comply with Article 4 of the Paris Agreement and with Article 15 of the EU Regulation 2018/1999 on the Governance of the Energy Union and Climate action to describe sector specific pathways to reach climate neutrality.

The Emissions Strategy builds upon the decarbonisation pathways laid out by the carbon budgets, sectoral emission ceilings and the CAP 2023 to ensure a coherent approach towards achieving carbon neutrality.

Benefits of action from a socio-economic perspective are highlighted in the Emissions Strategy which include reaping economic benefits from the development and export of offshore wind. To support this, the Emissions Strategy supports the continued roll out of *"regular, competitive auctions for onshore and offshore renewables under the Renewable Electricity support Scheme*"[47].

[45] Department of Environment, Climate and Communications, *Climate Action Plan 2024*, Dublin 2024 gov - Climate Action Plan 2024 (www.gov.ie) accessed February 2024

[46] Department of Environment, Climate and Communications, *Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction* (2023), 10

[47] Ibid, 42

The Emissions Strategy recognises the importance of renewables in meeting climate targets by stating:

"The core measures necessary to deliver a net zero emissions electricity sector are to deliver significantly higher renewable power capacity mostly through onshore wind, offshore wind, and solar PV.

To achieve the required increase in renewable electricity capacity, installation rates of wind and solar power will need to significantly accelerate.[48] *"*

The proposed development has secured a route to market as the Developer was successful in Ireland's first offshore renewable electricity support scheme (ORESS 1) auction in 2023, therefore, directly contributing to the Emissions Strategy by providing a long-term source of renewable energy. This will also facilitate the decarbonisation of the energy sector which will drive other sectors including heating and transportation towards carbon neutrality.

6.5.3 Project Ireland 2040: National Planning Framework (NPF)

Project Ireland 2040: National Planning Framework (NPF) and the National Development Plan 2018 – 2027 were published in 2018 and together set out a number of National Strategic Outcomes to support the OREDP. In 2021 a revised National Development Plan (NDP) was published to guide economic growth from 2021-2030.

The NPF is the overarching policy and planning framework for the social, economic and cultural development of the country. Together with the NDP (outlined in Section 6.5.4 below), the two documents present 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.

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
- Renewable Energy - transition to a low carbon energy future

The proposed development will support these objectives as it supports the growth and integration of low carbon and renewable energy.

Offshore renewable energy is specifically addressed in Chapter 7 of the NPF, Realising our Island and Marine Potential. Ireland's territorial waters are recognised as presenting "*major opportunities in the blue economy and offshore renewable energy sectors, which would support our transition to a zero carbon economy"*.

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."[49]

The proposed development will help to achieve the objectives of the NPF by sustainably capturing a portion of Ireland's offshore renewable energy potential and supporting the Irish transition to a low carbon energy system.

[48] Ibid, 44

[49] Ibid

6.5.4 National Development Plan

The National Development Plan (NDP) 2018 – 2027 was published in conjunction with the NPF in February 2018. The NDP has subsequently been updated for the period 2021-2030. The NDP acts as 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 2021-2030 aimed to deliver a Green Recovery Plan to manage the impact of the COVID 19 pandemic.

The NDP 2021-2030 has set out capital spending levels and priorities for the next decade. It has been developed as a plan that demonstrates the Government's unequivocal commitment to securing a sustainable Ireland.

NDP 2021-2030 also introduced the Economic Recovery Plan (ERP) which aims to have 2.5 million people employed in productive, innovative, resilient, secure, valued, and in new areas of opportunity. The ERP aims to combine policies and initiatives to drive this recovery and places emphasis on the CAP 2021 to guide the direction of this growth. Specifically, regarding the concept of a "Just Transition" wherein the NDP will measure the contribution to employment that is compatible with Ireland's long-term climate and environmental objectives.

The proposed development will deliver the economic growth necessary to the realisation of the Economic Recovery Plan by prioritising local employment and investment opportunities in the rapidly developing green economy. It will also be consistent with the NDP by providing critical infrastructure that will provide a source of renewable energy to contribute to the decarbonisation of Ireland's electrical system.

6.5.5 Programme for Government: Our Shared Future

The current Irish Government, formed in 2020, published its Programme for Government: Our Shared Future[50], which was adopted in June of 2020. The purpose of the Programme for Government is to provide a clear indication of the objectives and policies which the Government proposes to pursue over its 5-year term of office.

The Programme for Government places considerable emphasis on developing the vast potential of Ireland's offshore renewables industry and identifies a clear path to achieving national offshore wind energy targets.

The Programme for Government commits to a "revolution in renewables" by committing to the rapid decarbonisation of the energy sector and thereby creating new, quality jobs across the country51.

The Programme for Government also states that the Government will produce a long-term plan that will set out a path to achieving 5GW capacity in offshore wind by 2030 off Ireland's eastern and southern coasts. The proposed development will directly contribute towards Ireland meeting its offshore renewable energy targets which directly align with the aims of the Programme for Government.

6.5.6 Powering Prosperity – Ireland's Offshore Wind Industrial Strategy

In 2024, the Department of Enterprise, Trade and Employment published Powering Prosperity: Ireland's Offshore Wind Industrial Strategy which seeks to capitalise on the economic opportunities inherent in the 2050 target of 37GW of offshore renewable energy. Powering Prosperity establishes a pathway to 2030 to develop a strong domestic supply chain of industries and skills to create a resilient offshore renewable energy industry. The key targets for 2030 of Powering Prosperity include:

- Develop an innovative enterprise ecosystem, with indigenous and multinational companies, that will provide world-leading service to the offshore wind sector
- Dramatically scale up the enterprise base that will service the offshore wind sectors in Ireland and around the world

[50] Government of Ireland, *Programme for Government: Our Shared Future*, Dublin 2020, gov.ie - Programme for Government: Our Shared Future (www.gov.ie), accessed September 2022.

[51] Ibid 34

- Deliver up to 5,000 jobs in the offshore wind sector and related industries
- Maximise opportunities for companies and investors to develop a vibrant and successful supply chain
- In collaboration with other Departments, develop major industrial hubs around key deployment and operation and maintenance ports
- Transform Ireland's regional capability, and deliver opportunity for the people of Ireland, throughout Ireland, by developing industrial hubs and balanced regional economic growth

The proposed development will directly align with the objectives of Powering Prosperity: Ireland's Offshore Wind Industrial Strategy and will represent a crucial development for the realisation of a successful, vibrant and impactful offshore wind energy industry in Ireland.

6.5.7 The National Implementation Plan for the Sustainable Development Goals

In October 2022, Ireland launched a new National Implementation Plan for the Sustainable Development Goals 2022-2024.

The National Implementation plan was established in direct response to the United Nation's 2030 Agenda for Sustainable Development and provides a whole-of-government approach to implement the 17 Sustainable Development Goals (SDGs).

Goal 7 is to ensure access to affordable, reliable, sustainable, and modern energy for all. The two targets embedded in this goal are as follows:

- Target 7.1: By 2030, ensure universal access to affordable, reliable, and modern energy services and
- Target 7.2: By 2030, increase substantially the share of renewable energy into the global energy mix

The proposed development will deliver offshore renewable energy into the Irish energy mix. Offshore wind is an affordable, reliable, and modern energy source and as such, the proposed development is a necessary contribution that supports Ireland's targets set out in the National Implementation Plan for the Sustainable Development Goals 2022-2024. Thus, the proposed development will substantially contribute to Ireland's ability to increase its energy share of renewables within the global energy mix.

6.5.8 Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 was published in November 2023, as part of an Energy Security Package. The report presents a new strategy to ensure energy security in Ireland for this decade, while also ensuring a sustainable transition to a carbon neutral energy system by 2050.

The Energy Security report outlines how Ireland's future energy will be secured by moving from an oil and gas-based energy system to an electricity-led system. In order to facilitate this transition, the report places emphasis on maximising Ireland's renewable energy potential, flexibility, and the need to be integrated into Europe's energy systems.

The proposed development will deliver offshore renewable energy into the Irish energy mix. Offshore wind is a source of clean, affordable, and tried and tested energy that can aid the Ireland's transition to having an electricity-led energy system, in place of imported oil and gas-based energy systems and will support the reduction in reliance on the volatile imported energy market. As such, the proposed development will directly support the objectives of Energy Security in Ireland to 2030.

6.5.9 National Hydrogen Strategy

The National Hydrogen Strategy was published on 12 July 2023 and sets out the strategic vision for the role that hydrogen will play in Ireland's energy system. This Strategy looks into hydrogen's long-term role as a key component of a zero-carbon economy, and the short-term actions that are needed over the coming years to enable the development of the hydrogen sector in Ireland. The main aims of the Strategy are to decarbonise Ireland's economy, enhance Ireland's energy security and to develop industrial opportunities, through the potential development of export markets for renewable hydrogen and other areas such as sustainable aviation fuels.

In relation to enhancing Ireland's energy security, this Strategy, like many others, recognises Ireland's maritime area as having one of the best offshore renewable energy resources in the world. It is noted that utilising this asset and harnessing its renewable energy for the production of renewable hydrogen, can provide a significant opportunity for Ireland to reduce its reliance on imported fossil fuels, aid the achievement of energy independence, and could also provide an opportunity for Ireland to become a net exporter of renewable hydrogen in the long term.

The proposed development will deliver offshore renewable energy, which can potentially be harnessed for the production of renewable hydrogen in the future. Thus, the proposed development will support Ireland's contribution to the National Hydrogen Strategy.

6.5.10 Draft Offshore Renewable Energy Future Framework Policy Statement

The draft ORE Future Framework Policy Statement, published in January 2024, is an over-arching future framework for the development of offshore wind in Ireland's territorial seawaters and exclusive economic zone (EEZ).

This framework aims to deliver 20GW of ORE by 2040 and at least 37 GW in total by 2050. The draft Future Framework Policy Statement identifies 21 key actions to facilitate a long term and structured approach for the delivery of the ORE targets and which maximise the economic benefits to the State. These objectives are crucial for the decarbonisation of Ireland's economy, the delivery of long-term energy security and the development of green industrial opportunities for offshore renewable energy. As the proposed development is a fixed bottom foundation offshore wind farm which will be operational by 2030, it will facilitate the achievement of the targets in the draft Future Framework Policy Statement and will ensure delivery of offshore wind by 2030, which in turn will support the 37GW target of ORE by 2050.

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

The Irish Government approved a new framework and associated policy for Ireland's future offshore electricity system on April 14, 2021. The key ambition driving the policy statement on the framework for Ireland's offshore electricity transmission system is the 5GW of offshore wind by 2030, as well as the subsequent objective of harnessing approximately 30GW of floating wind in the Atlantic. The policy statement on the framework for Ireland's offshore electricity transmission system provides clarity for all stakeholders regarding the future development, operation and ownership of Ireland's offshore electricity grid by providing 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.

In the first phase of the phased transition, the Phase 1 projects, i.e., the projects which were successful in the first offshore RESS auction (including the proposed development) will develop the associated offshore transmission system requirement. The second phase entails the development of the offshore transmission system being carried out either by the respective developers or EirGrid. In the third phase, the offshore transmission systems will be developed solely by EirGrid, in specific areas designated for renewable development outlined in OREDP II.

As a Phase 1 project, the proposed development includes provision for the required transmission systems as detailed in Section 2 of this report and Volume 2 of the EIAR submitted in support of this application.

6.6 Regional

6.6.1 EMRA Regional Spatial & Economic Strategy 2019-2031

The Eastern and Midland Region covers the administrative areas of twelve local authorities. These are Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, Fingal, South Dublin and Dún Laoghaire-Rathdown County Councils and Dublin City Council. The proposed development is located within this region.

The Eastern and Midland Regional Assembly (EMRA) published the Regional Spatial and Economic Strategy[52] (RSES) in 2019 as a framework for implementing Project Ireland 2040's policy objectives on a regional scale. The RSES replaces the Regional Planning Guidelines.

The RSES aims to create a sustainable and competitive region that reflects three pillars of sustainability: social, environmental, and economic. The principles of climate action and economic opportunity are defined in the RSES as:

- The need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this
- To create the right conditions and opportunities for the Region to realise sustainable economic growth and quality jobs that ensure a good living standard for all[53]

The RSES came into effect on 31st January 2020. 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 RSES 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 RSES are structured under Regional Policy Objectives (RPOs). The proposed development aligns with several objectives of the RPOs, including RPO 10.24, in Chapter 10 of the RSES –

"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."[54]

The proposed development will effectively support the fulfilment of this objective by delivering a low carbon energy supply whilst promoting economic growth within the region. The proposed development will further deliver significant opportunities for the regional development of the green economy through implementation of indigenous energy infrastructure.

6.7 Local

6.7.1 County Development Plans

The development plans for the coastal planning authorities (CPA) of relevance to the proposed development are described in Sections 6.7.1.1 to 6.7.1.4. These include Fingal County Council, Dublin City Council, Meath County Council and Louth County Council. While the offshore infrastructure of the proposed development will be located off the coast of all four CPAs, onshore infrastructure will be located within Fingal County Council and Dublin City Council only.

6.7.1.1 Fingal Development Plan 2023-2029

The vast majority of the proposed onshore infrastructure elements of the proposed development will be located within the administrative boundaries of Fingal County Council (FCC).

The Fingal Development Plan 2023-2029 (hereafter referred to as the FDP) was adopted on 22nd February 2023 and came into effect on the 5th of April 2023.

The FDP is underpinned by four key themes: climate action, healthy place-making and sustainable development, social inclusion and high-quality design.

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[52] Eastern and Midland Regional Assembly,2019, *Regional Spatial and Economic Strategy 2019-2031*. https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf accessed July 2022

[53] Ibid 23

[54] Ibid 226

With respect to climate action, the FDP embodies the policy objectives outlined in the NPF (See Section 7.5.3) and serves to guide Fingal's development towards a low carbon community. The FDP supports the decarbonisation of the energy sector by transitioning to a diverse range of low, zero-carbon sources and through large renewable energy facilities.

With particular regard to renewable energy, *Section 5.5.3.3 Wind Energy* of the FDP notes:

"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. In this regard, Fingal County Council supports the implementation of the Offshore Renewable Energy Development Plan 2014 and subsequently reviewed in 2018 and will co-operate with state and semi-state agencies in relation to the implementation of projects in the Irish Sea.

Where appropriate, Fingal County Council will also seek to facilitate infrastructure such as grid infrastructure on the land side of any renewable energy proposals of the offshore wind resource, in accordance with the principles of the National Marine Planning Framework."

Additional policies relating to Climate Action are presented in the FDP, which supports the implementation of the Climate Actions Plans and promotes the development of renewable energy sources and associated electrical grid infrastructure. CAP16 specifically relates to the support for the development of offshore wind production and associated infrastructure including grid facilities in line with the principles set out in the NMPF.

The FDP further emphasises the need to support national energy targets by reducing dependency on imported fuels and replacing them with domestic energy supplies which will benefit the economy as well as the environment. The FDP highlights the commitment of FCC to support new infrastructure projects with a particular emphasis on renewable energy to provide a safe, secure, and reliable source of electricity.

Zoning Objectives

Landfall site

The landfall site is located north of Balbriggan and immediately south of Bremore Point in the townland of Bremore in North County Dublin. The landfall site encompasses Bremore Bay Beach, agricultural fields behind, a section of the Dublin to Belfast railway line and the R132.

The landfall site is primarily zoned as **High Amenity (HA)** or **Open Space (OS)** in the FDP. All infrastructure at the landfall site will be at or below ground level, therefore no impact to the sensitive zoning objectives will occur.

Grid Facility

The grid facility will be located in the townland of Bremore, Co. Dublin, approximately 2km north of Balbriggan town centre, west of the R132, close to the landfall site. The grid facility is zoned as **Rural (RU)** in the FDP. Utility Installations are listed as a permitted use within this zone.

Onshore Cable Route

The onshore cable route is approximately 33-35km in length and will be routed along public roads as much as possible apart from the connection point to the existing transmission network (at Belcamp substation) and where it is necessary to divert the route off the road for technical reasons. The proposed onshore cable route does not contravene zoning objectives of the FDP.

Development Management

The FDP provides for many development management policies which have been carefully considered in the design of the proposed development. Specifically relevant to the grid facility are the following objectives:

Objective DMSO17 – Location of New Utility Structures: *Where possible, new utility structures such as electricity substations and telecommunication equipment cabinets should not be located adjacent or forward of the front building line of buildings or on areas of open space.*

Objective DMSO18 – High Quality Design of New Utility Structures: *Require new utility structures such as electricity substations and telecommunication equipment cabinets to be of a high-quality design and to be maintained to a high standard by the relevant service provider.*

To minimise visual impact of the facility, mitigation is proposed which will consist of perimeter screen planting around the substation compound and a recessive colour scheme for the building. A detailed assessment of policy objectives relating to seascape, landscape and visual impact is presented in Volume 5, Chapter 29 of the EIAR submitted in support of this application.

Further policy objectives relating to biodiversity and heritage are also addressed within the EAIR submitted in support of this application, within Volume 4, Chapter 23: Biodiversity, and Volume 4, Chapter 25 respectively.

The proposed development will support the objectives of the FDP by providing a large source of offshore renewable energy off the coast of Fingal within the Irish sea. The proposed development will contribute to low carbon generation development and has been designed and will be constructed with due consideration for social, environmental, and cultural impacts.

Fingal County Climate Change Action Plan 2024-2029

Fingal County Council (FCC) developed the Climate Change Action Plan (CCAP) in collaboration with the other Dublin local authorities to deliver effective measures to respond to impacts driven by climate change on the Dublin Region and its citizens. The CCAP features actions across six key areas: energy and buildings, transport, flood resilience, nature-based solutions, circular economy and resource managements, and community engagement. In the CCAP, FCC committed to the target of a 51% reduction in GHG emissions by 2030.

The CCAP aligns with Irish and EU policy and identifies regional actions to achieve the climate targets for 2030 and beyond. Key actions include preparing local authority renewable energy strategies and undertaking studies on potential viable renewable energy projects. The CCAP is guiding the development of renewable energy projects through key objectives outlined in the FDP.

The proposed development will directly align with the objectives outlined in the FCC CCAP by delivering a significant source of offshore renewable energy to facilitate the decarbonisation of the energy sector within the region.

Our Balbriggan Rejuvenation Plan 2019-2025

The onshore cable of the proposed development will be routed through the town of Balbriggan.

FCC prepared the Our Balbriggan Rejuvenation Plan 2019-2025[55]. This plan includes a number of initiatives and funded projects proposed to rejuvenate Balbriggan town. Those of relevance to the proposed development included the proposed Bremore Regional Park (located to the south of the proposed development) (under construction) and the Fingal Coastal Way (which will run parallel to the rail line within the proposed development landfall area (at Emerging Preferred Route stage, planning application 2024) and Harry Reynolds Pedestrian and Cycle Scheme. Engagement is ongoing between the Developer and FCC in relation to the above projects.

6.7.1.2 Dublin City Council Development Plan 2022-2028

A short section of the onshore cable route of the proposed development will be located in Dublin City where the onshore cable connects to the National Grid Transmission Network at Belcamp Substation.

The Dublin City Development Plan 2022-2028 (hereafter referred to as the DCDP) (Dublin City Council (DCC), 2022) was adopted on the 2nd of November 2022 and came into effect on the 14th of December 2022. The DCDP aims to guide the City to develop in a manner to meet the needs of its residents, visitors and workers.

[55]Balbriggan (2019) Our Balbriggan Rejuvenation Plan 2019-2025 https://balbriggan.ie/wp-content/uploads/2019/05/Our-Balbriggan-Rejuvenation-Plan-compressed.pdf (accessed March 2024)

The vision of the DCDP 2022-2028 is to champion compact city living, distinct character, a vibrant culture, and a diverse, smart, green, innovation-based economy. DCC aims to establish the City as one of Europe's most sustainable, dynamic, and resourceful city regions. Decarbonising the energy sector, by facilitating a shift from fossil fuels to low-carbon energy sources, forms a key element of the climate action policy within the DCDP.

The DCDP recognises that wind power will make the most significant contribution to the achievement of national renewable energy targets and as such it is clear that the proposed development will support the delivery of large-scale offshore wind power which will make a large contribution to the achievement of the national renewable's energy target of 80% renewables by 2030 in Ireland.

The proposed development is situated close to one of Ireland's major load and growth centres in the Greater Dublin Area and as such supports the delivery of EirGrid's strategic aims in supporting the growth of the electricity network.

Zoning Objectives

The onshore cable route within DCC administrative boundary will be routed along public roads as much as possible apart from where it is necessary to divert the route off the road for technical reasons. The proposed onshore cable route does not contravene zoning objectives of the DCDP.

Development Management

The DCDP provides for many other development management policies which have been carefully considered in the design of the proposed development.

A detailed assessment of policy objectives relating to seascape, landscape and visual impact is presented in Volume 5, Chapter 29 of the EIAR submitted in support of this application.

Further policy objectives relating to biodiversity and heritage are also addressed in the EAIR, within Volume 4, Chapter 23: Biodiversity, and Volume 4, Chapter 25 respectively.

The DCDP includes policy objectives which directly support, encourage and facilitate the production of energy from renewable energy sources including offshore wind energy production in line with the OREDP. The proposed development will contribute to meeting the objectives of the DCDP by providing a large source of offshore wind energy to support the decarbonisation of the energy environment in Dublin City. The proposed development will be constructed with due consideration for social, environmental and cultural impacts.

The Dublin Region Energy Master Plan[56]

The Dublin Region Energy Masterplan (DREMP) was a project funded by the Sustainable Energy Authority of Ireland's Research, Development and Demonstration Funding Programme 2018. Codema[57] led the project and collaborated with the four Dublin local authorities to establish the first regional energy masterplan in Ireland.

The DREMP provides a realistic pathway for the Dublin Region to achieve carbon emission reduction targets to 2030 and 2050. The DREMP uses spatially driven energy scenario modelling to identify the cost-optimal solutions to deliver targeted actions to best reduce energy-related emissions within every region. At its core, the DREMP combines national and European plans and policies to demonstrate the impacts on the Dublin Region.

[56] Codema (2018) Dublin Region Energy Master Plan https://www.codema.ie/images/uploads/docs/Full_Report_-_Dublin_Region_Energy_Master_Plan.pdf (accessed March 2024)

[57] Codema is Dublin's Energy Agency and was set up as a not-for-profit limited company by Dublin City Council in 1997 under the SAVE II Programme of the European Union. It is one of 14 local energy agencies set up around Ireland to help local authorities meet their energy performance targets https://www.codema.ie/about-us/, accessed March 2024

The DREMP highlights the potential that offshore wind has to generate low-carbon electricity within the Dublin area with an estimated 5,241GWh of generation by 2030 and 13,124GWh in 2050. This represents the potential to provide electricity for the equivalent of 3.1 million homes by 2050. The DREMP provides a bottom-up approach to energy planning to deliver holistic approaches that combine different energy systems to enable local authority areas to achieve emission reduction targets. This pathway was produced in conjunction with the plans set forth in the Dublin City Development Plan and seek to cater to individual needs of each area within Dublin to deliver socially viable targets to improve connectivity.

6.7.1.3 Meath County Development Plan 2021-2027

The offshore infrastructure of the proposed development will be located off the coast of Counties Louth, Meath and Dublin and as such the Meath County development Plan has been considered in further detail.

The Meath County Development Plan 2021-2027 (MCDP) was adopted on 22nd September 2021 and came into effect on 3rd November 2021.

The MCDP seeks to establish guiding policies and objectives for the development of County Meath to continue to make significant contributions to the national economic recovery through sustainable development.

The MCDP recognises the significant role the green economy has to play in the competitiveness of the County and the country as a whole. Climate change adaptation and mitigation strategies are integrated throughout the MCDP with climate change as one of the cross-cutting themes.

In relation to energy, the MCDP includes several policy objectives which promote sustainable, locally based renewable energy alternatives. This includes the development of wind energy in accordance with government policies whist supporting Ireland's renewable energy commitments.

The MCDP also provides for the protection of high-quality landscape and seascapes. A detailed assessment of policy objectives relating to seascape, landscape and visual impact is presented in Volume 5, Chapter 29 of the EIAR submitted in support of this application.

The proposed development will align with the objectives of the MCDP by providing a large source of offshore renewable energy off the coast of Co. Meath. This will facilitate the transition to a low carbon economy and will contribute to the regional and national climate objectives.

6.7.1.4 Louth County Development Plan 2021-2027

The offshore infrastructure of the proposed development will also be located off the coast of County Louth.

The Louth County Development Plan 2021-2027 (LCDP) was adopted on 30th September 2021 and came into effect on 11th November 2021.

The LCDP sets out the overall strategy of Louth County Council for establishing a framework for sustainable develop in spatial, economic social and environmental terms.

One of the key strategic objectives of the LCDP, which will support the achievement of the LCDP's overall vision, is SO 4 which states:

Transition to a low carbon and climate resilient County supporting energy efficiency and reducing energy demand, through a combination of mitigation and adaptation responses to climate change. This includes for increased usage of renewable energy through developing indigenous energy resources, supporting the transition to a low carbon economy by 2050, and ensuring flood risk management. The Council will work with other bodies and organisations as appropriate, to identify and help protect critical infrastructure.

The LCDP recognises the need to take urgent and radical climate action through a combination of mitigation and adaptation measures. Amongst these is the Council's recognition that wind energy can significantly contribute to providing a clean and sustainable solution to meet the energy requirements of the local and national economy.

The LCDP also provides for the protected views and scenic routes from both a landscape and seascape perspective. A detailed assessment of policy objectives relating to seascape, landscape and visual impact is presented in Volume 5, Chapter 29 of the EIAR submitted in support of this application.

The proposed development will directly support the objectives of the LCDP by providing an indigenous source of renewable energy.

6.7.2 Local Area Plans

The Local Area Plans (LAPs) of relevance within close proximity of the proposed development are assessed in this section.

6.7.2.1 Lissenhall East Local Area Plan 2022

The onshore cable of the proposed development will be routed adjacent to the Lissenhall LAP boundary.

The Lissenhall East Local Area Plan (Lissenhall LAP) was adopted in January of 2023. It provides the land use framework to guide development on the Lissenhall East lands, which are situated in the northeastern part of Swords, within its development boundary.

The lands are strategically located approximately 5km north of Dublin Airport and adjacent to the M1 motorway, within the Dublin-Belfast economic corridor. The Lissenhall LAP provides a policy context to ensure that development which takes place within the lifetime of the LAP is consistent with strategic planning policy and has regard to relevant planning and environmental considerations.

Climate change was one of the three themes which shaped and informed the objectives of the Lissenhall LAP to align with national policy.

The proposed development will satisfy the objectives of the LAP by providing a large source of low carbon energy alternatives to the region.

6.7.2.2 Kinsaley Local Area Plan 2019-2025

The onshore cable of the proposed development will be routed along the R107 which is located within the boundary of the Kinsaley LAP.

The Kinsaley Local Area Plan (Kinsaley LAP) was adopted as part of the Fingal Development Plan 2017-2023 in May 2019. The Kinsaley LAP provides a framework for the planned, coordinated, and sustainable development of Kinsaley for the period of 2019-2025. The Kinsaley LAP was created in the context of the FDP and national climate policy which underpin the objectives of sustainable development, climate change adaptation, social inclusion and high quality design.

The proposed development will support the objectives of the Kinsaley LAP by providing a significant amount of low carbon renewable energy to the region.

6.7.2.3 Flemington draft Local Area Plan

FCC has published for consultation an issues paper for a draft LAP for the land adjacent to Flemington Lane, immediately south of the lands on which the grid facility will be located. However, there is insufficient information to assess the proposed development's compliance with the objectives of the Flemington LAP at this time.

6.8 Conclusions

The above policies and plans emphasise the essential contribution offshore wind will make to meeting national and European climate and renewable energy targets. The proposed development supports and is key to the delivery of multiple national and international policies and plans in relation to the production of renewable energy.

As an offshore wind project, the proposed development will deliver a significant proportion of Ireland's target of 5GW offshore renewable electricity and 80% of total electricity from renewables by 2030, thus contributing also to achieving the relevant EU objectives and targets (111GW of offshore wind deployment across Europe by 2030). As a significant indigenous energy source, the proposed development will help meet Ireland's security of supply requirements and the EU's objective to move away from imported fossil fuels. The proposed development will support the specific objectives of the NMPF in that it will contribute to the decarbonisation of electricity generation and will enhance the security of energy supply in Ireland.

Being located off the East Coast, the proposed development will deliver renewable electricity to an area of high demand and assist the transition of the region to low carbon energy, thereby meeting the climate and renewable energy objectives in the relevant county development plans.

7. Planning Conclusions

7.1 Legislative Compliance

The proposed development and this application are compliant with all relevant legislation and procedural guidance including the requirement to obtain a MAC, pre-application consultation under Sections 287 and 287A of the Planning Acts, and the requirements for the form in which an application must be submitted under Section 291. Also, in respect of Section 293 of the Planning Acts, the design of the proposed development, and the subsequent preparation of the EIAR and this Planning Report have taken significant consideration of the elements under which An Bord Pleanála must have regard when making a decision. As such, the following summary is provided:

- National Marine Planning Framework: Compliance Document included under Appendix D of this report
- Marine planning policy statement: Compliance evidenced under Section 6.4.1 of this report
- Any regional, spatial, and economic strategy of a regional assembly: Compliance evidenced under Section 6.6.1 of this report
- Any development plans of any coastal planning authority: Compliance evidenced under Section 6.7.1 of this report
- Any local area plans applicable to a part of the functional area of any coastal planning authority: Compliance evidenced under Section 6.7.2 of this report
- Any environmental impact assessment report or Appropriate Assessment: EIAR and NIS submitted as part of this application and summarised below in Sections 7.3 and 7.4

7.2 Policy Compliance

The detailed assessment of all relevant policy from international to local level has presented not only compliance with, but support to progress ambitious objectives. The policy analysis emphasises the essential contribution offshore wind will make to meeting national and European climate and renewable energy targets. The proposed development supports and is key to the delivery of multiple national and international policies and plans in relation to the production of renewable energy.

As an offshore wind project, the proposed development will deliver a significant proportion of Ireland's target of 5GW offshore renewable electricity and 80% of total electricity from renewables by 2030, thus contributing also to achieving the relevant EU objectives and targets, such as 111GW of offshore wind deployment across Europe by 2030. As a significant indigenous energy source, the proposed development will help meet Ireland's security of supply requirements and the EU's objective to move away from imported fossil fuels. The proposed development will support the specific objectives of the NMPF in that it will contribute to the decarbonisation of electricity generation and will enhance the security of energy supply in Ireland.

Being located off the East Coast, the proposed development will deliver renewable electricity to an area of high demand and assist the transition of the region to low carbon energy, thereby meeting the climate and renewable energy objectives in the relevant county development plans.

7.3 Conclusions of the EIAR

An EIAR is a "statement of the effects, if any, which the proposed development, if carried out, would have on the environment" (Environmental Protection Agency (EPA, 2022). The EIAR submitted in support of this application details the consideration of alternatives, consideration and assessment of likely significant effects, mitigation and monitoring measures to reduce significant adverse effects and assessment of residual effects. It has been prepared in compliance with Council Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU (the Environmental Impact Assessment (EIA) Directive).

The EIAR supports the statutory consent application to An Bord Pleanála for the proposed development, which if granted, will enable the construction, operation, maintenance and decommissioning of the proposed development as described herein.

Volume 1 of the EIAR contains the non-technical summary which summarises the findings and conclusions of the EIAR in a clear, understandable manner in non-technical language with relevant figures. The non-technical summary presents any likely significant effects, mitigation measures and relevant aspects of the EIAR in a way which can be easily understood.

7.4 Conclusions of NIS

The NIS submitted in support of this application presents the information required for a Stage 2 AA to be carried out by the competent authority, An Bord Pleanála, to determine whether or not the proposed development, either alone or in-combination, in view of best scientific knowledge, will adversely affect the integrity of European Sites.

Based on the assessment of the proposed development alone and in-combination, it was concluded that there is no potential for adverse effects on integrity of the Qualifying Interests of any European site.

7.5 Conclusions of the WFD Assessments

The detailed assessments presented in the WFD Compliance Reports (Appendix 11.1 of Volume 9: Offshore Water Framework Directive Compliance Report, and Appendix 22.2 of Volume 10: Onshore Water Framework Directive Compliance Report of the EIAR) indicated the following:

7.5.1 Offshore Water Framework Directive Compliance

On the basis of the information presented, the assessment concluded that there would be no potential for deterioration of the status of the Balbriggan, Front Strand Beach BW, North-West Irish Sea SPA and Rockabill SPA.

Further, the assessment concluded that proposed development will not result in a deterioration in the current status of hydromorphology, benthic habitats, fish, water quality, and benthic ecology and diversity (of relevance to Invasive and Non-Native Species), nor would it jeopardise the attainment of 'Good' status in the future. The proposed development is considered compliant with the WFD objectives in this regard.

7.5.2 Onshore Water Framework Directive Compliance

There is a low risk that the proposed development will cause a deterioration within the Matt_010, Ballough Stream_010, Ballough Stream_020, Ballyboghill_010, Tuvrvey_010, Broadmeadow_040, Ward_040, Gaybrook_010, Sluice_010 and Mayne_010 WFD river water bodies; Balrothery, Balbriggan, Dublin, Lusk-Bog of the Ring and Swords WFD groundwater bodies; and downstream protected areas. There is also low risk that the proposed development could prevent these waterbodies from achieving or maintaining their WFD objectives by the required date of 2027. Furthermore, there is low risk of either deterioration within adjacent water bodies, or of the mitigation measures identified in the RBMP for Ireland being prevented by the proposed development. As such, it is concluded that there is no risk of non-compliance of WFD as a result of the proposed development.

7.6 Overall Conclusion

This Planning Report has underscored not just the importance of the proposed North Irish Sea Array Offshore Wind Farm, but also the criticality of its successful realisation. The proposed development is a strategic initiative that aligns with the broader objectives of climate change mitigation and sustainable energy production. It stands as a testament to Ireland's commitment to harnessing renewable energy sources, thereby reducing reliance on fossil fuels, and making considerable strides towards achieving carbon neutrality goals.

Climate change and the climate emergency are indisputable at a global, national, and local scale. International treaties, and EU and Irish Government policy are responding to the climate change challenge with binding targets to reduce greenhouse gas emissions and develop renewable sources of electricity. It is essential that the proposed development proceeds in order to ensure these targets are achieved. The proposed development will deliver a significant portion of the 5GW target for offshore renewable generation which is imperative for meeting the 2030 targets whilst improving energy security and reducing reliance on the costly import of energy. Without the proposed development, there is a real risk Ireland's committed target of 5GW installed offshore wind capacity will not be met. This will further support the delivery of the wider European target of 111GW of offshore wind deployment across Europe by 2030.

Furthermore, the proposed development will generate substantial opportunities by contributing to local employment, regional delivery of renewable electricity generation, and a secure indigenous source of electricity. The community benefit fund will also provide local communities with approximately €4 million per annum for 20 years. The fund is expected to give residents a significant opportunity to bring about transformative and positive change to their local community through investment in local amenities and clubs, develop environmental and energy efficiency schemes and improve local industries throughout the region. Additionally, the proposed development will deliver clean renewable energy to between 500,000 and 700,000 homes.

By aligning new generation with existing infrastructure located within an area of high demand, the proposed development directly conforms with existing policies, plans and strategies of the Irish and European governments whilst directly addressing the climate emergency and enhancing Irelands energy security of supply. In essence, the proposed development is not just a project, but a vision of a sustainable and resilient future. It is a fundamental step forward in the journey towards a world where energy production and environmental preservation go hand in hand.

8. References

Balbriggan (2019) Our Balbriggan 2019-2025 Rejuvenation Plan: New Thinking, Fresh Leadership, Ambitious Initiatives

Codema (2021) Dublin Region Energy Masterplan

Department of Enterprise, Trade and Employment (2024) Powering Prosperity: Ireland's Offshore Wind Industrial Strategy

Department of the Environment, Climate and Communications (2014) Offshore Renewable Energy Development Plan

Department of the Environment, Climate and Communications (2015) Climate Action and Low Carbon Development Act 2015

Department of the Environment, Climate and Communications (2017) National Mitigation Plan 2017

Department of the Environment, Climate and Communications (2018) Offshore Renewable Energy Development Plan Interim Review May 2018

Department of the Environment, Climate and Communications (2020) Ireland's National Energy and Climate Plan 2021-2030

Department of the Environment, Climate and Communications (2020) Transition Protocol for relevant Offshore Wind Projects in the context of the MPDM Bill

Department of the Environment, Climate and Communications (2020) The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030

Department of the Environment, Climate and Communications (2021) Climate Action and Low Carbon Development (Amendment) Act 2021

Department of the Environment, Climate and Communications (2021) Climate Action Plan 2021

Department of the Environment, Climate and Communications (2021) Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System

Department of the Environment, Climate and Communications (2022) National Implementation Plan for the Sustainable Development Goals 2022-2024

Department of the Environment, Climate and Communications (2023) Climate Action Plan 2023

Department of the Environment, Climate and Communications (2023) Energy Security in Ireland to 2030

Department of the Environment, Climate and Communications (2023) Long-term Strategy on Greenhouse Gas Emissions Reductions

Department of the Environment, Climate and Communications (2023) National Hydrogen Strategy

Department of the Environment, Climate and Communications (2024) Consultation on the Offshore renewable energy (ORE) Future Framework Policy Statement

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

Department of Housing, Planning and Local Government (2021) Maritime Area Planning Act

Department of Housing, Planning and Local Government (2021) National Marine Planning Framework

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

Dublin City Council (2022) Dublin City Council Development Plan 2022-2028

Eastern and Midland Regional Assembly (2019) Regional Spatial and Economic Strategy for the Eastern and Midland Region

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

European Commission (2019) European Green Deal

European Commission (2020) An EU Strategy to harness the potential of offshore renewable energy for a climate neutral future

European Commission (2020) Stepping up Europe's 2030 climate ambition Investing in a climate-neutral future for the benefit of our people

European Commission (2021) EU Strategy on Adaptation to Climate Change

European Commission (2022) REPowerEU Plan

European Commission (2023) European Wind Power Action Plan

European Commission (2023) Member States agree new ambition for expanding offshore renewable energy. Available at: https://energy.ec.europa.eu/news/member-states-agree-new-ambition-expanding-offshore-renewable-energy-2023-01-19_en#:~:text=Member%20States%20agree%20new%20ambition%20for%20expanding%20offshore%20re

newable%20energy,-%C2%A9iStock%2FBenGrasser&text=EU%20countries%20have%20agreed%20on,achieved%20by%202030%20and%202040. (Accessed February 2024)

European Union (2014) Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning

European Union (2018) Directive (EU) 2018/2001 of the European Parliament and of The Council of 11 December 2018 on the promotion of the use of energy from renewable sources

European Union (2018) Regulation (EU) 2018/1999 of the European Parliament and of The Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council

European Union (2021) Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law')

European Union (2022) Council Regulation (EU) 2022/2577 of December 2022 laying down a framework to accelerate the deployment of renewable energy

European Union (2023) European Directive 2023/2413 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652

European Union (2023) European Wind Charter

Fingal County Council (2019) Kinsaley Local Area Plan

Fingal County Council (2021) What Next? Balbriggan Town Rejuvenation Plan Update 2021

Fingal County Council (2022) Lissenhall East Local Area Plan

Fingal County Council (2023) Fingal County Development Plan 2023-2029

Fingal County Council (2024) Climate Change Action Plan 2024-2029

Government of Ireland (2014) Foreshore Act 1933, as amended

Government of Ireland (2015) Climate Action and Low Carbon Development Act

Government of Ireland (2021) Climate Action and Low Carbon Development (Amendment) Act 2021

Government of Ireland (2021) Maritime Area Planning Act

Government of Ireland (2022) Planning and Development Maritime and Valuation (Amendment) Act 2022

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

Louth County Council (2021) Louth County Development Plan 2021-2027

Meath County Council (2021) Meath County Development Plan 2021-2027

Offshore Wind Delivery Taskforce (March 2023) Offshore Wind Energy Programme, Key Actions for 2023

Programme for Government (June 2020): Our Shared Future.

Appendix A

Information Provided by Developer under Section 287A of Planning Acts

ARUP

North Irish Sea Array Windfarm Ltd

North Irish Sea Array Offshore Wind Farm

Request for Opinion on Flexibility Under Section 287A(2) of the Planning and Development Act 2000, as amended

Reference: ABP-316332-23

| 26 October 2023

Job number 281240-00

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1. Prospective Applicant/General Project Details

North Irish Sea Array Windfarm Ltd. ("NISA") a Joint Venture between Statkraft Ireland Ltd and Copenhagen Infrastructure Partners P/S (hereafter referred to as the Developer) proposes to make an application for permission to carry out the development of the North Irish Sea Array Offshore Wind Farm (hereafter referred to as the proposed development) under Section 291 of the Planning and Development Act 2000, as amended (the "Planning Acts").

On 5th January 2023, the Developer submitted a request to An Bord Pleanála (the "Board") to enter pre-application consultation under Section 287(1) of the Planning Acts for the proposed development. The Board allocated Case number ABP-315801-23 to that request.

Subsequently, on March 10th 2023, Arup on behalf of the Developer prepared a report in response to a request from the Board (Case number ABP-315801-23) dated 20th February 2023 for the information described in its letter to be submitted to the Board in accordance with Section 288(1)(a) of the Planning Acts.

In that report, Arup confirmed on behalf of the Developer that the Developer would be requesting an opinion on flexibility under Section 287A of the Planning Acts. The Board allocated Case number ABP-316332-23 to that request.

On 31st May 2023, the Developer undertook a pre-application consultation ("PAC") meeting with the Board under Section 287(1) of the Planning Acts for the proposed development (Case number ABP-315801-23).

The Board invited the Developer to a follow up PAC meeting on 21st September 2023. Following this meeting, the Board invited the Developer to submit an '*application for opinion under section 287B*' of the Planning Acts.

For the purposes of seeking an opinion on design flexibility, the information required under Section 287A(2) of the Planning Acts is provided below. **Table 1** describes where the information required under Section 287A(2)(a)-(h) of the Planning Acts is addressed within this application.

Following submission of this application, a meeting with the Board under Section 287A of the Planning Acts will take place on 2nd November 2023.

Table 1 Signpost for provision of information as required under S287A(2) (a)-(h)

Section 287A (2)	Location in this report
(a) the name and address of the prospective applicant	Section 1.2
(b) a site location map sufficient to identify the maritime area in which the proposed development would be situated	Section 2
(c) a brief description of the nature and purpose of the proposed development and of its possible effects on the environment	Section 3
(d) a draft layout plan of the proposed development	Section 2
(e) a description of— (i) the details, or groups of details, of the proposed development that, owing to the circumstances set out in subparagraph (ii), are unlikely to be confirmed at the time of the proposed application, and	Section 4.4
(e) (ii) the circumstances relating to the proposed development, including such circumstances as the Minister may prescribe in relation to any class or description of development for the purposes of this subparagraph, that indicate that it is appropriate that the proposed application be made and decided before the prospective applicant has confirmed the details referred to in subparagraph (i) in particular, whether the prospective applicant may be able to avail of technology available after making the proposed application that is more effective or more efficient than that available at the time of the application,	Section 4.3

Section 287A (2)	Location in this report
(f) an undertaking to provide with the proposed application either— (i) two or more options in respect of each detail or group of details referred to in paragraph (e)(i), containing information on the basis of which the proposed application may be made and decided, (ii) parameters within which each detail referred to in paragraph (e)(i) will fall and on the basis of which the proposed application may be made or decided, or (iii) a combination of subparagraphs (i) and (ii),	Section 4.4
(g) such other information, drawings or representations as the prospective applicant may wish to provide or make available, and	Not providing.
(h) such other information as may be prescribed.	Not providing.

1.1 Application Fee

The Developer would be grateful if the Board could confirm the fee required as soon as possible. An electronic fund transfer can be then arranged.

1.2 Details of the Prospective Applicant

Applicant/Developer Name: North Irish Sea Array Windfarm Ltd.

Applicant Address: Building 3400, Cork Airport Business Park, Cork, T12 D23C

Contact Person: Tina Raleigh

Telephone Number: 086 0401188

Email Address: tina.raleigh@statkraft.com

2. Site location map(s)

The proposed development will be located within the proposed development boundary which is depicted as a "red line boundary" on the accompanying drawings in Appendix A which include the following:

- GEN-ZZ-0001: Site Location Map
- OFS-ZZ-1001: Offshore Layout Plan

The site location map shows the location of the proposed development including the maritime area in which the proposed development will be situated in addition to the location of the landfall, the onshore cable corridor and the grid connection at Belcamp. The draft offshore layout plan shows the indicative location of the offshore wind farm array and export cable corridor within the proposed development boundary. It is noted that the offshore layout plan as presented on OFS-ZZ-001 is at draft stage and does not reflect the two fixed layouts that will be provided in the planning application documentation.

3. Brief description of the nature and purpose of the proposed development and of its possible effects on the environment

3.1 Nature and Purpose of the Proposed Development

The proposed development is an offshore wind farm located off the coast of counties Dublin, Meath and Louth, bringing with it an opportunity to significantly contribute to the development of a clean, renewable energy future for the region.

Once operational the offshore wind farm will have the capacity to provide renewable energy for 500,000-700,000 homes and will transmit approximately 700 MW of generated electricity from the offshore wind farm to the national transmission grid. The proposed development will further the Irish Government's objectives with regard to increasing the generation and supply of renewable electricity and reducing the emissions of greenhouse gases, leading to an enhancement of Ireland's energy security, addressing a European wide target driven by REPowerEU. This will be an important contribution to reducing the effects of climate change on the environment, facilitating economic development and providing renewable power for a growing population. The Government published its Climate Action Plan (CAP) (to tackle Climate Breakdown) in 2019 to comply with the requirements of the Climate Action and Low Carbon Development Act 2015 and EU Regulation 2018/1999. The latest CAP (2023) includes a target of at least 5 GW of offshore wind by 2030 (and an additional 2 GW offshore wind for green hydrogen production).

As previously mentioned, the proposed development comprises of a combination of offshore infrastructure and onshore infrastructure ancillary works and activities. A brief description of the offshore and onshore elements is provided below.

3.2 Offshore Infrastructure

The key offshore elements of the proposed development will comprise the following:

- Between 35 and 49 offshore wind turbine generators (WTGs) (within array area)
- One offshore substation platform (OSP) (within array area)
- Substructures and associated seabed foundations (for WTGs and OSP) (within array area)
- Subsea inter-array cables (within array area)
- Offshore export cables (within an offshore export cable corridor)
- Scour protection around substructures and cable protection (as required); and
- Landfall site (interface between offshore and onshore infrastructure)

3.3 Onshore Infrastructure

The key onshore elements of the proposed development will comprise the following:

- Landfall site (interface between offshore and onshore infrastructure)
- Two 220kV offshore export cables (within an offshore export cable corridor)
- Two Transition Joint Bay(s) (within an onshore cable corridor)
- Two 220 kV HVAC underground export cable circuits between landfall site and onshore grid facility (within an onshore cable corridor)
- Onshore grid facility (comprising two distinct substations: the compensation substation and Bremore substation)

- Approximately 33-35km of a 220kV HVAC underground cable
- Connection to the existing EirGrid / ESBN substation at Belcamp; and
- Supporting infrastructure and ancillary works

3.4 Potential Environmental Effects

The preparation for an Environmental Impact Assessment Report ("EIAR") and Natura Impact Statement ("NIS") are ongoing, but not yet complete. The following brief description of potential environmental effects is made for the purposes of section 287A(2)(c).

Given the nature and location of the proposed development, the potential environmental effects arising during the construction, operation and decommissioning phase of the proposed development differ between the offshore and onshore infrastructure. A brief summary of the potential environmental effects, before any mitigation is applied, are provided below.

Mitigation measures will be considered throughout the design process of the proposed development. The requirement and feasibility of any mitigation measures will be dependent on the significance of the effects and will be consulted upon with a range of stakeholders throughout the Environmental Impact Assessment ("EIA") process.

The proposed development will be subject to all relevant environmental assessments, including an EIA and screening for an Appropriate Assessment ("AA") and AA, as necessary.

3.4.1 Offshore

Offshore construction activities such as drilling and piling, which may be required for the installation of the turbine foundations, have the potential to cause physical injury/ mortality and behavioural effects on marine mammals, benthic species, and fish through the introduction of additional underwater noise and vibration levels. Other construction works such as the preparation of the seabed for foundations could also lead to an increase in suspended sediment and turbidity which could result in a deterioration in water quality, reduction in prey availability and distribution and impact on benthic habitats. This in turn may result in potential impacts on commercial fisheries. An increase in vessel activity and installation works may also result in direct disturbance or displacement of birds from important offshore habitats, feeding and roosting areas.

The installation of the foundations for the wind turbines, potential scour protection and cables have the potential to cause direct disturbance and damage to known and undiscovered artefacts of marine archaeological significance. Similar impacts may occur as a result of anchoring and jack-up activities.

During the operational phase, there is a risk of birds in flight colliding with rotating turbine blades, however this depends upon physiological and behavioural characteristics of the species, in addition to the final layout and design specifications for the wind turbines. Potential visual impacts and potential impacts on shipping, navigation, aviation, commercial fisheries may arise due to the physical presence of the offshore wind turbines.

3.4.2 Onshore

Potential environmental effects arising from the construction activities associated with the installation of the onshore infrastructure predominately relates to loss of habitat and disturbance to nesting passerines, wintering birds, bats, mammals etc. Potential effects on watercourses are dependent on the crossing methodologies to be employed and the good work practices to implemented.

Potential effects on human health and wellbeing during the construction phase include noise, vibration, air quality, traffic and visual impacts.

The majority of the onshore infrastructure will be underground, however, during operation, potential landscape visual impacts may arise due to the physical presence of the onshore substation at Bremore.

Potential effects on the environment during the decommissioning phase of the proposed development will be similar to those expected during the construction phase, however given all below ground infrastructure will remain in-situ the potential effects are anticipated to be of a smaller scale and temporary in nature. The mitigation measures, described for the construction phase, will be implemented for the decommissioning phase, however these will be updated to reflect best practice at the time.

4. Design flexibility

4.1 Overview

As required under Section 287A(2)(e)(i) and (ii) of the Planning Acts, in seeking an opinion on design flexibility, the Developer has provided a description of:

i. the details of the proposed development that are unlikely to be confirmed at the time of the proposed application, and

ii. the circumstances relating to the proposed development that indicate that it is appropriate that the proposed application be made and decided before the final details are confirmed.

A description of the details of the proposed development that will not be confirmed at the time of the proposed application are provided in **Section 4.4** and the circumstances relating to the proposed development that indicate it is appropriate the proposed application be made and decided before the final details are confirmed are provided in **Section 4.3**.

4.2 Design Flexibility Guidance

4.2.1 Circular letter MPP 01/2023

A circular letter (MPP 01/2023) was issued by Department of Housing, Local Government and Heritage to the Board on 17th July 2023 titled 'An Opinion on Design Flexibility for Maritime Development'. The circular is intended to assist the Board in the application of the provisions of design flexibility for maritime development, under Section 287A of the of the Planning Acts.

The circular acknowledges that:

'Owing to the complex nature of offshore wind development, certain details of a proposed scheme may be unknown to the applicant at the time of submitting an application to the Board, including, but not limited to, foundation type, exact turbine tip height and turbine blade size. It is accepted that wind energy developers are unlikely to know precisely which turbines will be procured for the site until sometime after any consent has been granted. Accordingly, a degree of flexibility at planning application stage is desirable.'

The Circular also states that:

'*When requesting a meeting under section 287A, the applicant is required to provide an undertaking to include the following information as part of the application on the basis of which the proposed application may be assessed and decided:*

- *two or more options in respect of each detail or group of details referred to in paragraph 287A (2)(e)(i), containing information on the basis of which the proposed application may be made and decided;*
- *parameters within which each detail referred to in paragraph 287A (2)(e)(i) will fall and on the basis of which the proposed application may be made and decided, or;*
- *A combination of both options and parameters in respect of these details to be confirmed.'*

4.2.2 The Board correspondence 31st July 2023 (ABP-315801-23)

The Board issued a letter to the Applicant on 31st July 2023 in relation to Section 287A of the Planning Acts. Within the letter the Board advises that:

'*Options referred to under section 287A(2)(f) should refer to material differences only, and should follow the guidance set out below:*

(i) No more than two options, in respect of the details / technology to be deployed, such as turbine model, height, rotor diameter should be included in the application.

(ii) Parameters within which details referred to in item (i) above will fall such as the location, layout, foundation type and number of structures or other components of the development.

(iii) Combination of both options.

Where further options under item (i) are deemed necessary, regard should be had to the requirements in respect of the Environmental Impact Assessment and Appropriate Assessment processes.'

The letter also states that '*[t]here should not be an excessive number of options or range of parameters.*'

The areas of flexibility sought by the proposed development outlined in **Section 4.4** have regard for both the letter issued by the Board and the Circular from the Department of Housing Local Government and Heritage. The flexibility sought falls under the category of either options, parameters or both. There are not an excessive number of options or ranges of parameters. Justification for the flexibility required has been provided, including in instances where more than two options was required, described in **Section 4.3**.

4.3 Justification for flexibility

As required by Section 287A(2)(e)(ii) the circumstances relating to the proposed development that indicate it is appropriate that the proposed application be made are provided in this section.

4.3.1 WTG model

The WTG model that will be available to the proposed development at the time of construction will be unknown prior to the proposed application being submitted. The basis for the maximum export capacity (MEC) will be dictated by the transmission system operator (TSO), Eirgrid. The MEC dictates the total number of WTGs required for the project, and the WTG capacity/dimensions. Ultimately, this means that the dimensions of the WTG cannot be confirmed prior to application. Therefore, flexibility is required in relation to the WTG model the proposed development is applying for.

Flexibility in WTG model within planning applications for offshore wind farms is a standard approach taken in a number of jurisdictions with well-established consenting regimes for offshore wind farm development.

WTG availability

There will be significant advancements in WTG technology between the submission of the proposed planning application and the construction of the proposed development. With WTG technological advancements the WTG models become larger, with greater output per WTG resulting in a reduction to the levelised cost of energy. Production of the smaller, lower output WTG models ceases once larger models become available, due to being rendered less economically efficient. Therefore, WTG models that are currently available on the market will no longer be available when the proposed development is in a position to procure WTGs for construction.

For projects to maintain their commercial viability, projects must be able to benefit from advances in technological design and installation / construction techniques developed concurrently with the consenting process but not considered possible to confirm at the time of application.

It is currently unknown the rate of technological advancement that will occur between the planning stage and the construction stage of the proposed development. WTG manufacturers do not make formal announcements about the termination of production of specific models, so this information is not publicly available.

Therefore, it is unknown which WTG models will be available, what the dimensions of those WTGs will be and what the MW capacity will be once the proposed development reaches construction stage and is procuring WTGs.

There are also benefits to the consumer with regard to ensuring projects are able to procure the latest, most efficient WTGs on the market. Such WTGs have lower maintenance costs which subsequently reduces project development costs and can lead to reduction in the levelised cost of energy for consumers.

The offshore wind industry is experiencing significant supply chain constraints, with WTG suppliers potentially struggling to meet demand. This has potential to impact the availability of WTGs and will impact the procurement of generator assets. This uncertainty in the supply chain availability applies globally but has realistic potential to directly impact Irish projects. Confirmation on the WTG model will not be possible prior to submission of the proposed application.

Environmental Benefits

The proposed development aims to reduce potential environmental impacts where possible through the project design. Flexibility in the WTG models consented enables the proposed development to construct and install the most efficient WTG models that are available at the time of construction. Using the most efficient WTG models available on the market to procure means the overall number of turbines required to achieve target export capacity is reduced. A reduction in the number of WTG's is anticipated to reduce environmental impacts in a number of key ways including, but not limited to:

- reduced bird collisions
- reduced interaction with shipping and navigation
- reduced impacts to benthic ecology due to fewer foundations; and
- reduction in underwater noise impacts to marine mammals and fish and shellfish due to fewer foundation installations.

4.3.2 WTG foundations

The foundation type required for the proposed development will depend on the WTG model selected. The size and weight of the WTG influences the size and type of foundation that is most suitable. Therefore, the foundation size cannot be determined until the WTG model is determined. Therefore, flexibility is required in relation to the foundation type. Flexibility in turbine design also allows for advances in turbine design and installation techniques which could reduce interactions with the environment.

Further details regarding the site investigation work required in advance of confirming foundations is provided in **Section 4.3.4** below.

4.3.3 OSP

Flexibility is required in relation to the design of the OSP, both the topside which will contain the electrical componentry, and the foundation structure which will support the topside. The foundation structure cannot be confirmed prior to application, due to the exact location of the OSP being unknown (**Section 4.3.4**). The OSP will be sited in the most efficient location to reduce array and export cable lengths to the extent possible. However, the location cannot be confirmed until the detailed site investigation surveys have been undertaken to inform on the ground conditions. The final location of the OSP will influence the design of the foundation, including its size and weight. The design of foundation support structures is also influenced by the oceanographic conditions, of which, the detailed characterisation will be complete post application submission. Additionally, and similar to the WTG, technological advancement of electrical infrastructure is possible; design refinement of cable and major electrical components (e.g., transformers) is possible and will vary between different high voltage equipment suppliers. Given the lack of certainty on the final design of the electrical componentry necessitates flexibility in relation to the design of the OSP.

4.3.4 Siting of infrastructure

Programme of development works

A Maritime Area Consent (MAC) was awarded to the proposed development in December 2022 which included an 18-month deadline for the planning application submission. As such, the planning application needs to be submitted by June 2024. The proposed development was also awarded an Offshore Renewable Energy Support Scheme (ORESS) contract in June 2023 which requires the proposed development be fully operational by December 2031. Additionally, in order to contribute to the national target of 5GW offshore wind by 2030 the proposed development needs to be operational by 2030.

In order to meet these timelines, there is a requirement for project workstreams to occur concurrently with the planning application process, including detailed foundation design and site investigation surveys. Both of these workstreams are interdependent and require a lengthy lead in time. Designing offshore foundations involve the data collection aspect of the site investigations (along with significant post processing and interpretative work), followed by an iterative and complex structural design process.

The Foreshore Licence for site investigations in the array was awarded to the proposed development in December 2021, with the first site investigation survey commencing when the weather permitted in May 2022. Following this, survey data analysis took several months as a result of the detailed data obtained. Following the data analysis, complex design studies were undertaken which also took several months. The results of the initial site investigation survey works have facilitated the reduction in the footprint of the proposed development.

However, given the time constraints on the proposed development, there is insufficient time to conduct the detailed site investigation surveys and characterize the oceanographic conditions, have this data analysed and processed such that it can inform detailed design work. The layout of offshore infrastructure is influenced by the ground conditions, and as discussed in **Section 4.3.1**, is also dependant on the WTG model. Therefore, flexibility is required regarding the siting of the offshore infrastructure.

Two fixed layouts for the WTG will be provided in the consent application, one for each discrete Project Option the proposed development is including in the proposed application. The flexibility required in the siting of infrastructure relates to limits of deviations from those fixed locations. A limit of deviation for micro-siting will be provided in the consent application and each WTG can move no further than the limit of deviation in any direction and all offshore infrastructure will be sited within the offshore development boundary. It is noted that the offshore layout plan as presented on OFS-ZZ-001 is at draft stage and does not reflect the two fixed layouts that will be provided in the planning application documentation.

Flexibility in the siting of offshore infrastructure within planning applications for offshore wind farms is a standard approach taken in a number of jurisdictions with well-established consenting regimes for offshore wind farm development. It should also be acknowledged it is standard practice in other jurisdictions for detailed site investigation surveys to occur post consent award due to prohibitively high costs preventing developers from securing the required funds without the certainty of having the project consent. However, due to the timelines from the proposed development's MAC and ORESS conditions, and national renewable energy targets the proposed development will be undertaking the detailed site investigation survey as soon as possible on receipt of a licence from Maritime Area Regulatory Authority (MARA), which is anticipated to occur during the determination period.

Requirement for detailed site investigation surveys

The underlying geology across the proposed development array is variable; the sediment type and thickness of subsoil strata varies, along with the depth to bedrock within the extent of the site. If the geological profile was consistent and more homogeneous, and in particular, the depth and type of bedrock was consistent, then it may have been possible to provide more firm locations within the planning application. The results of the first round of site investigation survey data have allowed reliable conceptual designs. However, due to the variability in the seabed, and the inherent large spatial extent of offshore wind farms, detailed site investigation surveys are required prior to confirming the precise locations of infrastructure, and the associated foundation designs.

Additionally, due to the varied seabed, the WTG model that will be used is required to be known prior to the detailed site investigation survey being undertaken. The WTG model will determine the number of WTG, and the type and size of foundations required. Confirmation on these aspects of the project design will determine the number and survey area that will be targeted during the detailed site investigation surveys.

The proposed development has reduced the request for flexibility significantly by reducing the development boundary where the WTG will be sited to just 36% of the entire MAC boundary. A fixed layout for each discrete Project Option the proposed developing is including in the proposed application will be provided, however, a limit of deviation from that layout will be required. The precise location of WTG within the limited array area will not be confirmed until detailed site investigation surveys are undertaken. This will be executed in parallel with the consenting process in order to adhere to the time constraints the proposed development is working to.

Incorporation of mitigation measures

Flexibility is also required in the siting of offshore infrastructure in order to allow for the application of mitigation measures that may be required based on any potential discoveries made during the detailed site investigation surveys. For example, if any protected habitats, unexploded ordinance (UXO) or designated archaeology are identified during the detailed site investigation surveys, then these areas would be avoided when siting the offshore infrastructure. Mitigation measures to reflect this will be proposed in the EIAR. Therefore, flexibility in the siting of offshore infrastructure allows for the adjustment of locations and the implementation of mitigation measures.

4.4 Flexibility of the proposed development

As required by Section 287A(2)(e)(i) the details of the proposed development that, owing to the circumstances set out in **Section 4.3,** are unlikely to be confirmed at the time of the proposed application are provided in **Table 2** below.

The consent application for the proposed development will align with the details provided in **Table 2**. This undertaking is provided in respect of Section 287A(2)(f)(i)-(ii) of the Planning Acts.

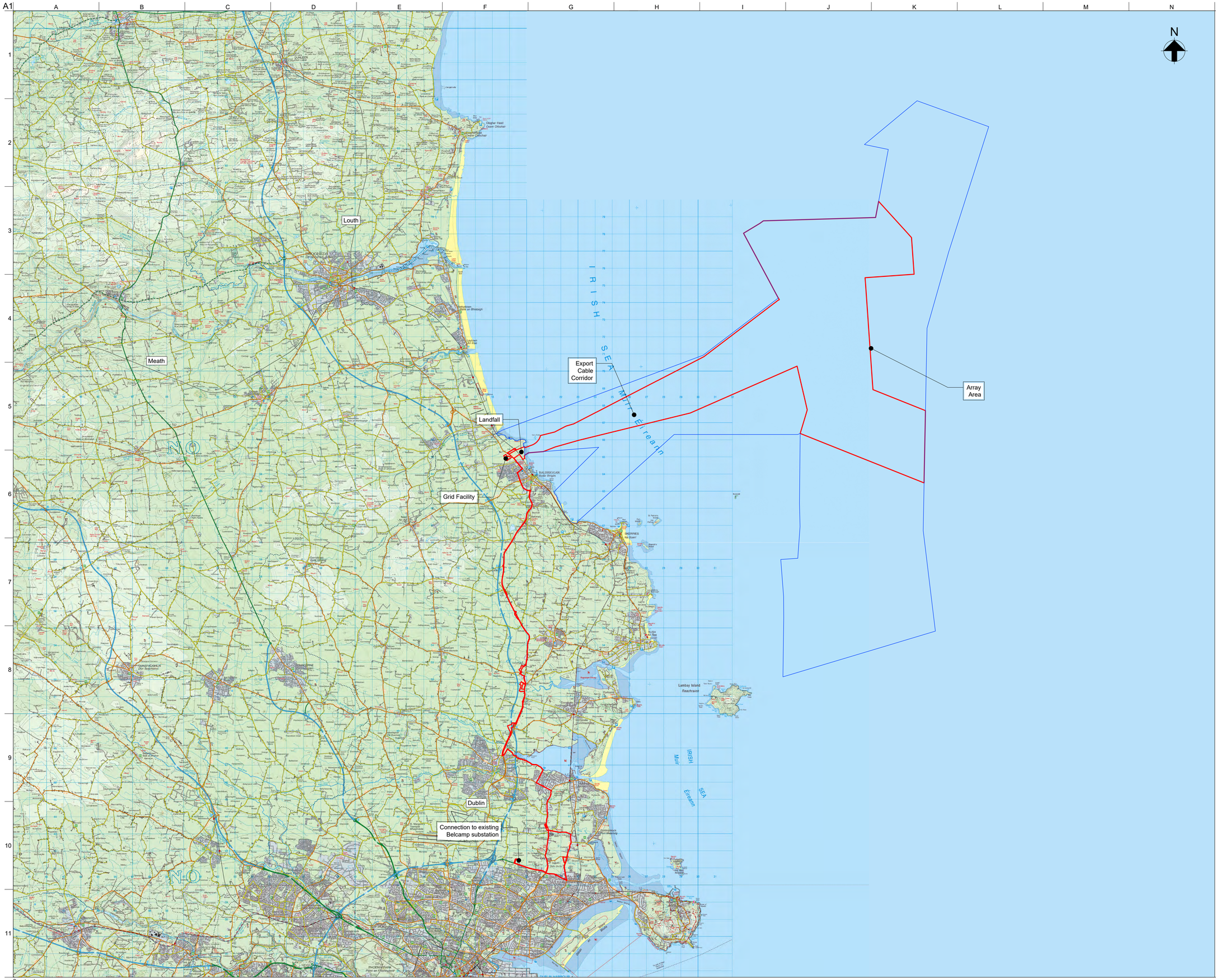
Table 2 Details of the proposed development not confirmed at the time of the proposed application submission

Aspects of Design	Options or Parameters or both	Flexibility to be sought		Will future technology be more effective or more efficient
		Parameter or option description	Extent / range / value	
(e) a description of – ***(i) the details, or groups of details, of the proposed development that, owing to the circumstances set out in subparagraph (ii), are unlikely to be confirmed at the time of the proposed application***	*(f) an undertaking to provide with the proposed application, either—* *(i) two or more options, in respect of each detail or group of details referred to in paragraph (e)(i), containing information on the basis of which the proposed application may be made and decided,* *(ii) parameters within which each detail referred to in paragraph (e)(i) will fall and on the basis of which the proposed application may be made and decided, or* *(iii) a combination of subparagraphs (i) and (ii),*			*(e)(ii) including, in particular, whether the prospective applicant may be able to avail of technology available after making the proposed application that is more effective or more efficient than that available at the time of the application*
Siting of Infrastructure				
WTG	Parameters	WTG locations	Fixed location with limit of deviation.	Yes
Foundations	Parameters	Foundation locations	Fixed location with limit of deviation.	Yes
Export cable alignment	Parameters	Export cable alignment	Fixed location with limit of deviation.	Yes
OSP Location	Parameters	OSP siting	Fixed location with limit of deviation.	Yes
WTG				
WTG number	Options	WTGs	Two options for WTG number. One for each discrete Project Option.	Yes
WTG dimensions	Options	Tip Height of turbines Rotor diameter Rotor swept area Nacelle and hub height	Two options for each WTG dimension. One for each discrete Project Option.	Yes
WTG Foundations and substructures				
Foundation type	Options	Foundation type options	Two options.	Yes
Foundation dimensions	Both	Diameter of pile structure	Maximum and minimum for each foundation option.	Yes
Offshore Cabling				
Subsea cable size	Parameter	Subsea cable size	Minimum and maximum subsea cable size.	Yes

Aspects of Design	Options or Parameters or both	Flexibility to be sought		Will future technology be more effective or more efficient
		Parameter or option description	Extent / range / value	
Subsea cable length	Parameter	Length of offshore cables	Minimum and maximum length of array and export cables.	No
Cable protection	Parameter	Dimensions of cable protection	Minimum and maximum height, width and depth of cable protection	No
OSP				
OSP foundation type	Options	Foundations	Three options.	Yes
OSP dimensions	Parameter	OSP dimensions	Minimum and maximum dimensions for OSPs topside: height above sea level, length and width. Minimum and maximum dimensions for OSP foundations.	Yes

Appendix A

Drawings



DRAFT

Rev	Date	By	Chkd	Appd
P03	12.09.23	KON	ND	MD

ARUP

One Albert Quay
Cork, Ireland
Tel +353 (0)21 422 3200
www.arup.com

Client
North Irish Sea Array Windfarm Ltd.

Project Title
North Irish Sea Array
Offshore Windfarm

Drawing Title
Site Location Map

Scale at A1 1:100,000 @ A1, 1:200,000 @ A3

Role Civil

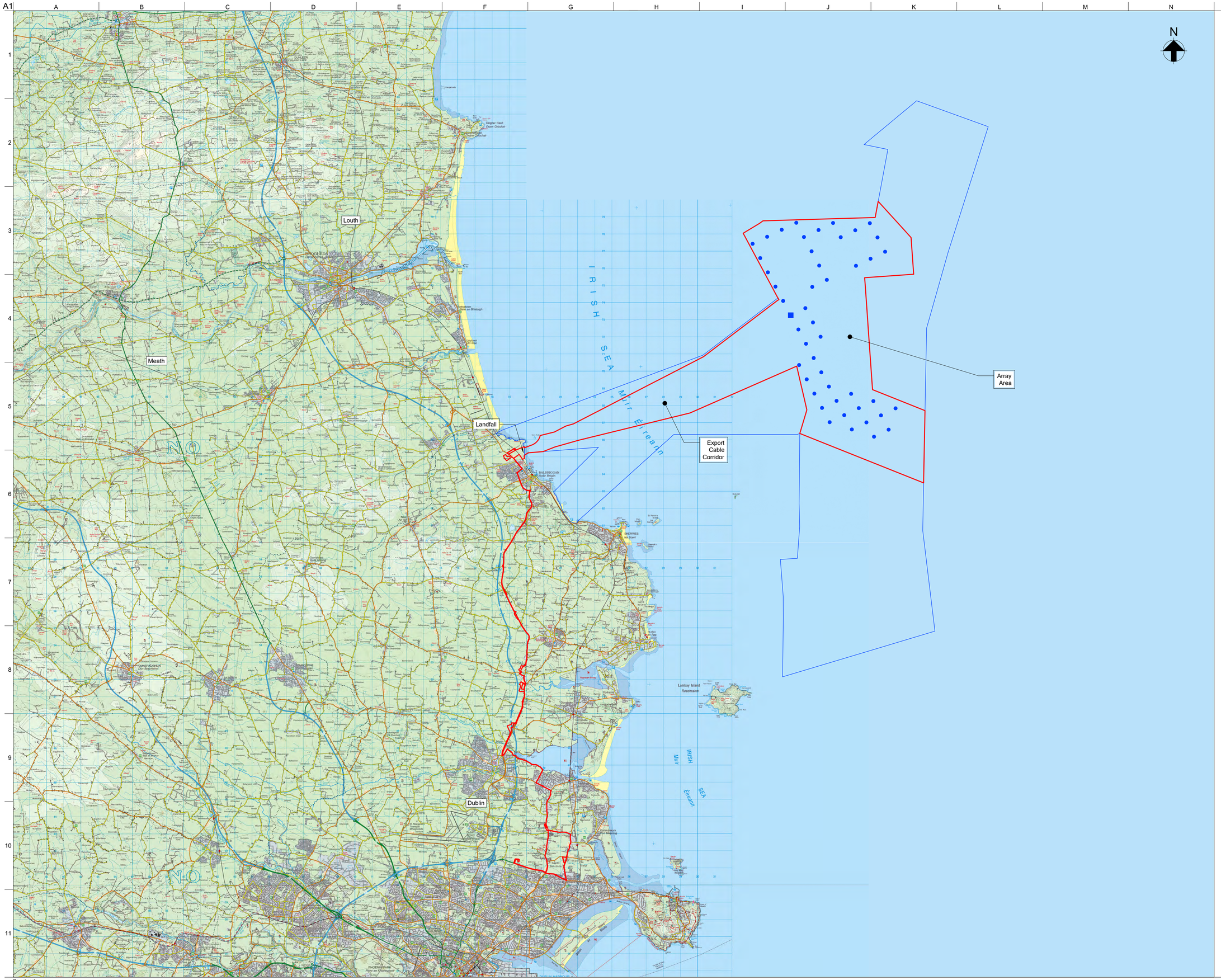
Suitability Planning

Arup Job No	Rev
281240-00	P03

Name
GEN-ZZ-0001

Do not scale

A1



DRAFT

Rev	Date	By	Chkd	Appd
P03	12.09.23	KON	ND	MD

ARUP

One Albert Quay
Cork, Ireland
Tel +353 (0)21 422 3200
www.arup.com

Client
North Irish Sea Array Windfarm Ltd.

Project Title
North Irish Sea Array
Offshore Windfarm

Drawing Title
Offshore Layout Plan

Scale at A1 1:100,000 @ A1, 1:200,000 @ A3

Role Civil

Suitability S2: Suitable for Information

Arup Job No	Rev
281240-00	P03

Name
OFS-ZZ-1001

Do not scale

Appendix B

Design Flexibility Opinion Received from An Bord Pleanála under Section 287B of Planning Acts

Our Case Number: ABP-316332-23

Your Reference: North Irish Sea Array Windfarm Ltd

An Bord Pleanála

ARUP
c/o Fiona Patterson
One Albert Quay
Co. Cork
T12X8N6

Date:

Re: Offshore windfarm with a maximum of 49 WTGs (Design Option).
Off the coast of Dublin, Meath and Louth.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned case.

An amending Board Opinion has been made under section 146A of the Planning and Development Act 2000, as amended.

A copy of the amending Opinion is enclosed.

Henceforth, the Board's Opinion should be read in conjunction with the amending Opinion.

Yours faithfully,

Nichola Meehan
Senior Executive Officer

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Glao Áitiúil	**LoCall**	1800 275 175
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Láithreán Gréasáin	**Website**	www.pleanala.ie
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An Bord Pleanála Opinion on Flexibility ABP-316332-23M

Planning and Development Act 2000, as amended

Amendment of An Bord Pleanála Opinion on Flexibility

Name of requestor/prospective applicant: North Irish Sea Array Windfarm Ltd., (Statkraft Ireland Ltd.)

Development Concerned: Offshore Windfarm with a maximum of 49 turbines. Off the coast of Dublin, Meath & Louth,

WHEREAS the Board made a determination, in relation to the above-mentioned proposed development on the 30th day of January, 2024,

AND WHEREAS it has come to the attention of the Board that reference to the Offshore Platform Foundation Type was omitted due to a clerical error in section 4 a) of the Opinion of the Board,

AND WHEREAS the Board considered that the clarification of the above-mentioned matter would not result in a material alteration of the terms of the proposed opinion,

NOW THEREFORE in accordance with section 146A(1) of the Planning and Development Act 2000, as amended, the Board hereby amends the above-mentioned determination so that section 4 a), under the heading Details/Circumstances – point 3 of its Opinion shall be as follows:

4) Opinion of the Board under section 287B of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.	
Information	**Details/ Circumstances**
a) The details, or groups of details, of the proposed development that may be confirmed after the proposed application has been made and decided.	1. Turbines (Model, Number & Dimensions [Tip height, Rotor diameter, Rotor swept areas, Nacelle height & Hub height]) 2. Turbine Foundations (Type & Pile Dimensions) 3. Offshore Substation Platform (**Foundation Type** and Dimensions [Height above sea level, Length & Width])

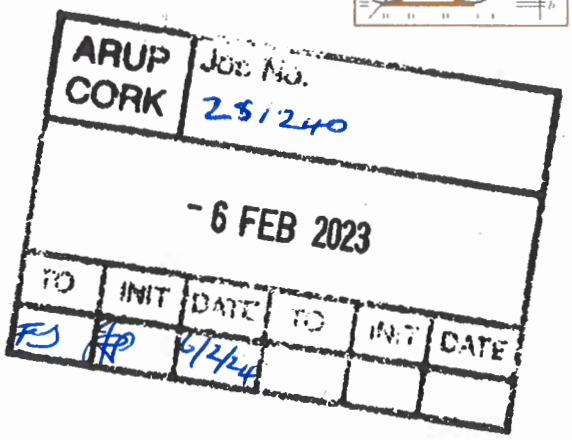
Chris McGarry
Member of An Bord Pleanála
duly authorised to authenticate the seal of the Board.

Dated this 16th **day of** April **2024**

Our Case Number: ABP-316332-23

Your Reference: North Irish Sea Array Windfarm Ltd

An Bord Pleanála



ARUP
c/o Fiona Patterson
One Albert Quay
Co. Cork
T12X8N6

Date: 02 February 2024

Re: Offshore windfarm with a maximum of 42 WTGs (Design Option).
Off the coast of Dublin, Meath and Louth.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned proposed development.

Please be advised that following consultations under section 287A of the Planning and Development Act 2000, as amended, the Board has formed an opinion on design flexibility. A copy of the opinion is enclosed.

Please note that the Board's opinion on design flexibility will not be available for public inspection until an application is made to it under section 291 of the Act.

Information in relation to challenges to the validity of a decision of An Bord Pleanála under the provisions of the Planning and Development Act 2000, as amended, is also enclosed.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email marine@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

pp Richard Mahon

Evan McGuigan
Executive Officer
Direct Line: 01 873 7200

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

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64 Marlborough Street
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D01 V902

Judicial review of An Bord Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

A person wishing to challenge the validity of a Board decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Board.

The validity of a decision taken by the Board may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Board. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

General information on judicial review procedures is contained on the following website, www.citizensinformation.ie.

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

An Bord Pleanála

An Bord Pleanála Opinion on flexibility

2) Request for meeting	
Request under section 287A of the Act:	Request for Design Flexibility in relation to a proposed offshore windfarm.
Request reference Number:	ABP-316332-23
Name of the requestor/ prospective applicant:	North Irish Sea Array Windfarm Ltd., (Statkraft Ireland Ltd.)
Location, townland or postal address of the land or structure to which the application relates (as may be appropriate):	Off the coast of Dublin, Meath & Louth
Nature and extent of the proposed development:	Offshore Windfarm with a maximum of 42 (49) turbines.
Date of receipt of the request:	11th April 2023
Opinion Reference Number:	ABP-316332-23
Date of Opinion:	26th January, 2024

3) Was the following Information included where relevant, with the Flexibility Meeting Request under section 287A of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.			
Information	**Enclosed with Request**		
(a) A site location map sufficient to identify the land on which the proposed development would be situated.	Yes: [✓]	No: [ ]	
(b) A brief description of the nature and purpose of the proposed development and of its possible effects on the environment.	Yes: [✓]	No: [ ]	
(c) A draft layout plan of the proposed development.	Yes: [✓]	No: [ ]	
(d) A description of the details, or groups of details, of the proposed development that, owing to the circumstances set out in (e) below, are unlikely to be confirmed at the time of the proposed application.	Yes: [✓]	No: [ ]	
(e) A description of the circumstances relating to the proposed development that indicate that it is appropriate that the proposed application be made and decided, before the prospective applicant has confirmed the details referred to in (d) above.	Yes: [✓]	No: [ ]	
(f) An undertaking to provide with the proposed application, either - i. two or more options, in respect of each detail or group of details referred to in (d) above containing information on the basis of which the proposed application may be made and decided, ii. parameters within which each detail referred to in paragraph (d) above will fall and on the basis of which the proposed application may be made and decided, or	Yes: [✓]	No: [ ]	

iii. a combination of (i) and (ii).			
(g) Such other information, drawings or representations as the prospective applicant may wish to provide or make available.	Yes: [ ]	No: [ ]	N/A: [✓]
(h) The appropriate fee.	Yes: [ ]	No: [ ]	N/A: [✓]

At a meeting held on 24th January, 2024 and 25th January, 2024 the Board considered the report of the Inspector, the documents submitted as part of the pre-application consultation under section 287A of the Planning and Development Act 2000 as amended on design flexibility.

In accordance with Section 287B(2) of the Act, the Board 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.

In this regard an opinion on design flexibility shall issue to the prospective applicant as set out below:

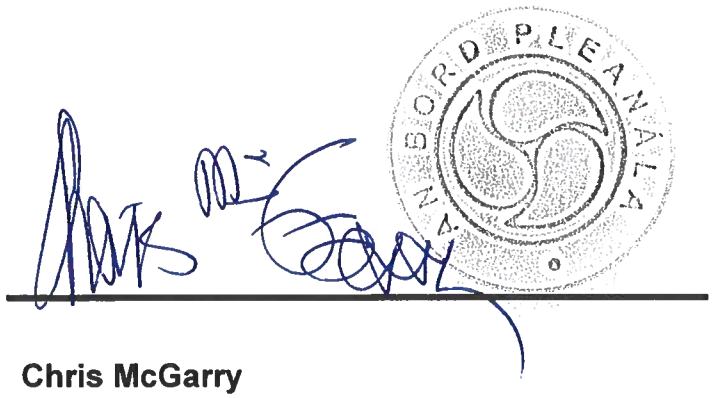
4) Opinion of the Board under section 287B of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.	
Information	**Details/ Circumstances**
a) The details, or groups of details, of the proposed development that may be confirmed after the proposed application has been made and decided.	1. Turbines (Model, Number & Dimensions [Tip height, Rotor diameter, Rotor swept areas, Nacelle height & Hub height]) 2. Turbine Foundations (Type & Pile Dimensions) 3. Offshore Substation Platform (Dimensions [Height above sea level, Length & Width])

	4. Siting of infrastructure – Fixed location with limit of deviation (Turbines, Foundations, Export cable and Offshore Substation Platform location) 5. Offshore cabling (Subsea cable size & Subsea cable length).
b) The circumstances relating to the proposed development that indicate that it is appropriate that the proposed application be made and decided before the prospective applicant has confirmed the details referred to in paragraph (a) above.	Ongoing advances in technology and recognition of the need to install the most efficient and effective project elements in relation to Items 1 to 5 above.

For each detail, or groups of details, referred to above, the proposed application shall, in addition to any other requirement imposed by or under the Planning and Development Act 2000, as amended, be accompanied by the information referred to in the undertaking and be in the form of the options range and set of parameters, submitted with the flexibility meeting request under section, 287A(2)(f) of the Planning and Development Act 2000, as amended.

The Board decided not to accept the request for design flexibility for the extent and nature of the protection for subsea cable 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 of the development. Options related to construction practice that may not be clarified at application stage, should be set out and assessed in the application documentation (including the EIAR and NIS) and in the event of a favourable decision on the application, construction related methodologies could be agreed prior to commencement of development, by way of compliance with a planning condition.

The proposed application must be consistent with the opinion provided in accordance with section 287B of the Act.



Chris McGarry
Member of An Bord Pleanála
duly authorised to authenticate
the seal of the Board.

Dated this 25th day of January 2024

Our Case Number: ABP-316332-23

Your Reference: North Irish Sea Array Windfarm Ltd

An Bord Pleanála

ARUP
c/o Fiona Patterson
One Albert Quay
Co. Cork
T12X8N6

Date: 04 April 2024

Re: Offshore windfarm with a maximum of 42 WTGs (Design Option).
Off the coast of Dublin, Meath and Louth.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to its letter to you dated 6th February, 2024 in relation to the above-mentioned proposed development.

In order to provide clarification and for the avoidance of doubt it is noted that the request for 42 number turbines applied for, was increased to 49 number turbines during the course of the pre-application consultation process.

Therefore, having regard to the above, an application by North Irish Sea Array Windfarm Ltd. to the Board in relation to the proposed development may be for 49 number turbines.

Yours faithfully,

Nichola Meehan
Senior Executive Officer

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

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64 Marlborough Street
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Appendix C

Form 22 Supplementary Information to Accompany an Application Accompanied by an Opinion on Flexibility

Supplementary information to accompany an application accompanied by an opinion on flexibility

1. Prospective Applicant Name:	North Irish Sea Array Windfarm Limited

2. Contact details of person authorised to operate on behalf of the Prospective Applicant (Applicant or Agent): (Not for Public release)	
Name:	Fiona Patterson
Correspondence Address:	Arup One Albert Quay Cork Ireland T12 X8N6
Telephone:	+353 21 4223327
Email:	fiona.patterson@arup.com

3. Proposed Development	
Address of the proposed development:	The offshore infrastructure of the proposed development will be located off the coast of counties Dublin, Meath and Louth. The onshore infrastructure of the proposed development will be located in County Dublin (Fingal County Council and Dublin City Council administrative areas).
Description of the proposed development:	Offshore wind farm consisting of wind turbine generators, offshore substation platform and subsea cables, landfall and associated infrastructure, grid facility and associated infrastructure, and onshore cables and grid connection.

4. Declaration:	
I hereby declare that, to the best of my knowledge and belief, the information given in this form is correct and accurate and fully compliant with the Planning and Development Act 2000, as amended, and the Regulations made thereunder.	
5. Signature of person authorised to operate on behalf of the Prospective Applicant:	
	
Date:	6th June 2024

6. Information on Flexibility Meeting Request and Opinion on Flexibility	
Meeting requested under section 32H, 37CC, 182F or 287A of the Act:	287A of the Act
Meeting Reference Number:	1st
Date of Meeting Request:	26th October 2023
Date of Meeting:	2nd November 2023
Opinion Reference Number:	ABP-316332-23
Date of Opinion:	26th January 2024

7. Document to be submitted			
Document	**Enclosed with Request**		
A copy of the opinion issued under section 32I, 37CD, 182G or 287B of the Planning and Development Act 2000	Yes: [√] Refer to Appendix B of Planning Report	No: [ ]	

8. Statement of unconfirmed details		
(a) Outline each of the of the details, or groups of details, of the proposed development that are unconfirmed in the application		
1. Turbines (model, number & dimensions [tip height, rotor diameter, rotor swept areas, nacelle height & hub height])		
2. Turbine foundations (type & pile dimensions)		
3. Offshore substation platform (foundation type and dimensions [height above sea level, length & width])		
4. Siting of infrastructure – fixed location with limit of deviation (turbines, foundations, export cable and offshore substation platform location)		
5. Offshore cabling (subsea cable size & subsea cable length)		
(b) For each detail, or groups of details, referenced in (a) above confirm whether the application for permission in respect of the unconfirmed details is being made on the basis of options, parameters or both and provide a description of the details of the options, parameters or both.		
Detail	**Options/ Parameters/ Both**	**Details of options/ parameters or both**
Turbines	Options	Two options for WTG number and dimensions.
Turbine Foundations	Both	Two options for foundation type Maximum and minimums for foundation dimension
Offshore substation platform	Both	Three options for foundation type Minimum and maximum dimensions for OSPs topside:

		height above sea level, length and width. Minimum and maximum dimensions for OSP foundations
Siting of infrastructure	Parameters	Fixed locations with 500m limit of deviation
Offshore cabling	Parameter	Minimum and maximum subsea cable size. Minimum and maximum length of array and export cables.

9. Official Use only:	
Planning Reference:	
Board Stamp:	

Appendix D

NMPF Compliance Document

Contents

Tables

1. Introduction

This report presents an assessment of compliance of the North Irish Sea Array Offshore Wind Farm (hereafter referred to as the 'proposed development') with the objectives of the National Marine Planning Framework (NMPF) published in June 2021. This report provides information on the measures implemented by North Irish Sea Array Windfarm Limited (Ltd) (hereafter referred to as the 'Developer') to ensure compliance with the objectives of the NMPF.

The NMPF brings together all marine-based human activities for the first time, and sets out the Government's vision, objectives and marine planning policies for each marine activity.

The NMPF does not replace or remove existing regulatory regimes or legislative requirements governing the operation of various marine sectoral activities. Rather, it provides an overarching framework for their continued operation.

An Bord Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the NMPF.

The proposed development is an offshore wind farm comprising 35 or 49 wind turbine generators (WTGs) installed using monopile or jacket foundations, 18km of offshore export cables, between 91km to 111km of inter array cables and one offshore substation platform (OSP). The onshore elements include connection of the offshore export cables to a proposed grid facility close to the landfall at Bremore and a 33-35km onshore cable route to connect the grid facility to an existing transmission substation at Belcamp, North Co. Dublin.

In Table 1, the consistency of the proposed development with the objectives of the NMPF is assessed.

Table 1 Consistency of the proposed development with the policies and objectives of the NMPF.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
OVERARCHING MARINE PLANNNG POLICIES (OMPPs)			
Environmental - Ocean Health			
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 Marine Strategy Framework Directive (MSFD) targets identified.	Yes	The proposed development is an offshore wind farm which comprises construction, operation and decommissioning phases. Compliance with NMPF policies has been embedded into the design of the proposed development wherever possible. Where this has not been possible, additional mitigation and monitoring measures are proposed to ensure compliance. In relation to the MSFD, the first cycle of implementation established 24 environmental targets covering all descriptors. The 2021 update to the Irish Marine Strategy has led to 25 revised environmental targets to align with the Birds and Habitats Directives, the Water Framework Directive, the Common Fisheries Policy and in turn with the criteria in the Commission Decision 2017/848. This resulted in 10 biodiversity targets, two commercial fisheries targets, three eutrophication targets, four targets for contaminants, two targets for marine litter and one target for non-indigenous species, hydrographical conditions, underwater noise, and contaminants in seafood. These are addressed throughout the EIAR as follows: • Ten Biodiversity targets (including food webs and sea-floor integrity) are addressed in the following chapters: Volume 3, Chapter 10: Marine Geology, Oceanography and Physical Processes (hereafter referred to as the 'Physical Processes Chapter'), Volume 3, Chapter 11: Marine Water and Sediment Quality (hereafter referred to as the 'Marine Water and Sediment Quality Chapter'), Volume 3, Chapter 12: Benthic Subtidal and Intertidal Ecology (hereafter referred to as the 'Benthic Ecology Chapter'), Volume 3, Chapter 13: Fish and Shellfish Ecology (hereafter referred to as the 'Fish and Shellfish Chapter'), Volume 3, Chapter 14: Marine Mammal Ecology (hereafter referred to as the 'Marine Mammals Chapter'), Volume 4, Chapter 15: Offshore and Intertidal Ornithology (hereafter referred to as the 'Offshore Ornithology Chapter'), Volume 5, Chapter 23: Biodiversity (hereafter referred to as the 'Biodiversity Chapter'), and Volume 5, Chapter 35: Offshore Bats (hereafter referred to as the 'Offshore Bats Chapter'). No significant, long-term negative effects have been identified in relation to the biodiversity targets for all impacts assessed. However, under the precautionary principle, a likely significant effect cannot be ruled out for foraging bats from the potential bat population at Rockabill as further monitoring is required to determine if a roost exists on the island. For further information on the assessment undertaken refer to Chapter 35. • Two commercial fisheries targets are addressed in the following chapters: the Fish and Shellfish Chapter and Volume 3, Chapter 16: Commercial Fisheries (hereafter referred

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			to as the 'Commercial Fisheries Chapter'). No significant negative effects have been identified in relation to the commercial fisheries targets. • Three eutrophication targets are addressed in the following chapters of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, and Volume 4: Chapter 22: Water (hereafter referred to as the 'Water Chapter'). No significant negative effects have been identified in relation to the eutrophication targets. • Four targets for contaminants are addressed in the following locations of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, the Water Chapter, the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8), and the Onshore Construction Environmental Management Plan (Appendix 9.1 of Volume 8). No significant negative effects have been identified in relation to the contaminants targets. • Two targets for marine litter are addressed in the following locations of the EIAR: Volume 5, Chapter 31: Resource and Waste Management (hereafter referred to as the 'Resource and Waste Chapter') and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8). No significant negative effects have been identified in relation to the marine litter targets. • The non-indigenous species target is assessed in the following locations of the EIAR: the Benthic Ecology Chapter, the Biodiversity Chapter, and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8). No significant negative effects were identified in relation to the non-indigenous species target. • The hydrographical target is addressed in the following locations of the EIAR: the Physical Processes Chapter, the Marine Water and Sediment Quality Chapter, the Water Chapter. No significant negative effects have been identified in relation to the hydrographical targets. • The underwater noise target is addressed in the following locations of the EIAR: the Fish and Shellfish Chapter, the Marine Mammals Chapter and the Underwater Noise Modelling Report (Appendix 14.1 of Volume 8). • The target contaminants in seafood is addressed in the Fish and Shellfish Chapter. No significant negative effects have been identified in relation to the contaminants in seafood targets. The assessments conducted concluded that the proposed development will not have a negative effect on achieving good environmental status for the 25 current MSFD targets which demonstrates compliance of the proposed development with Environmental – Ocean Health Policy 1.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Biodiversity			
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: • avoid • minimise or • mitigate significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity	Yes	The proposed development has the potential to have significant adverse impacts on species adaption or migration or natural habitat connectivity. However, the design has been developed to avoid impacts where practicable and the assessments carried out in the preparation of the EIAR have included measures to minimise and mitigate against any potential adverse effects on biodiversity. As such no significant permanent negative impacts on species adaptation or migration, or on natural native habitat connectivity, are expected. However, under the precautionary principle, a likely significant effect cannot be ruled out for foraging bats from the potential bat population at Rockabill as further monitoring is required to determine if a roost exists on the island. For further information on the assessment undertaken in relation to offshore bats refer to Chapter 35. The residual effects of the proposed development in relation to species and species habitats are described in the following chapters: • The Benthic Ecology Chapter: Sections 12.5 to 12.7 demonstrate that the effects on seabed habitats and communities arising from disturbances during the lifecycle of the proposed development are all assessed to be not significant. • The Fish and Shellfish Chapter: Sections 13.5 to 13.7 inclusive, demonstrate that the significance of effects on fish, shellfish and megafauna species (turtles and basking sharks) associated with temporary increase in suspended sediment concentrations (SSC) and sediment deposition; habitat damage and disturbance; mortality, injury, behavioural impacts and auditory masking arising from noise and vibration are all assessed to be not significant. • The Marine Mammals Chapter: Sections 14.5 to 14.7 inclusive, demonstrate that the significance of effects associated with UXO clearance, pile driving, other construction activities, disturbance and collisions with vessels on prey availability and distribution and increased concentration of suspended solids are all assessed to be not significant for all species, post mitigation. The mitigation to be used includes a Vessel Management Plan (VMP), and a piling-specific Marine Mammal Management Protocol (MMMP). • The Offshore Ornithology Chapter: Sections 15.5 to 15.7 inclusive, demonstrate that the proposed development with proposed mitigation will not have significant effects on bird species adaptation or migration, and there will be no significant disturbance or displacement to birds. • In the Biodiversity Chapter, the significance of effects associated with disturbance or important habitat reduction is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, reversible and negative residual effects at a local geographical scale to FW2 Lowland depositing river habitat during the construction phase.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			Short-term, reversible, and negative impacts are also assessed on WL1 hedgerows and WL2 treelines and on breeding birds which will be reversed as habitats are reinstated and compensatory planting is established at Blakes Cross North and the landfall site. Temporary, reversible impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas. However, positive, long-term effects are expected during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development. • The Offshore Bats Chapter; Sections 35.5 to 35.7, inclusive, demonstrate that the proposed development with proposed mitigation will not have significant adverse effects on bat species adaptation or migration, and there will be no significant disturbance or displacement to bat species and populations with one exception. Under the precautionary principle a likely significant effect cannot be ruled out for foraging bats from the potential bat population at Rockabill as further monitoring is required to determine if a roost exists on the island. For further information on the assessment undertaken in relation to offshore bats refer to Chapter 35. The proposed development has been subjected to a robust design and assessment process intended to avoid and minimise impacts to biodiversity, including on species adaptation or migration, or on natural native habitat connectivity. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level. Consequently, the proposed development complies with the requirements of Biodiversity Policy 1.
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.	Yes	The assessments carried out in the preparation of the EIAR have included measures to avoid, minimise and mitigate against any potential adverse effects on the distribution and net extent of important habitats and other habitats that important species depend on. No significant adverse impacts on such habitats are expected. Evidence of this is included within the following chapters: • In the Benthic and Intertidal Ecology Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with habitat damage and disturbance is assessed to be not significant. • In the Fish and Shellfish Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with a temporary increase in SSC and sediment deposition, habitat damage and disturbance, are all assessed to be not significant. In the Marine Mammals Chapter, the significance of effects associated with UXO clearance, pile driving, and temporary increase in suspended sediment concentration (SSC) are all assessed to be minor or negligible for all species, post mitigation. • In the Biodiversity Chapter, the significance of effects associated with habitat disturbance or important habitat reduction is assessed in Sections 23.5 to Section 23.7.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			The assessment concluded that there would be short-term, reversible and negative residual effects at a local geographical scale to FW2 Lowland depositing river, WL1 hedgerows and WL2 treelines habitats during the construction phase. Temporary, reversible and negative impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas. However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development. The proposed development has been subject to a robust design and assessment process intended to avoid and minimise impacts on habitats. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level. Consequently, the proposed development complies with the requirements of Biodiversity Policy 2.
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 mitigate significant adverse impacts on marine or coastal natural capital assets, or c. 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	Yes	The design has been developed to avoid, where possible, impacts on marine or coastal natural capital assets, such as flora and fauna, air, water, geology and soils. The assessments carried out in the preparation of the EIAR have included measures to minimise and mitigate against any potential adverse effects on natural capita assets. No significant, permanent negative impacts on natural capital assets are expected. The residual effects of the proposed development in relation to natural capital assets is included within the following chapters: • In the Benthic and Intertidal Ecology Chapter: Sections 12.5 to 12.7 demonstrate that the significance of effects assessment of the potential impacts to seabed habitats arising from disturbances during the lifecycle of the proposed development are all assessed to be not significant. • In Volume 4, Chapter 21: Land and Soils, Sections 21.5 to 21.7 demonstrate that the significance of effects assessment of the potential impacts to soils and geology arising from disturbances during the lifecycle of the proposed development are not significant. • In the Water Chapter, Sections 22.5 to 22.7 demonstrate that the significance of effects assessment of the potential impacts to water quality arising from disturbances during the lifecycle of the proposed development are not significant. • In the Biodiversity Chapter, the significance of effects associated with disturbance to natural capital asses is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, reversible negative residual effects at a local geographical scale to FW2 Lowland depositing river habitat. However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			• The assessment presented in Volume 5, Chapter 27: Air Quality (hereafter referred to as the 'Air Quality Chapter') concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development. The proposed development has been subject to a robust design and assessment process which has sort to avoid and minimise impacts to marine and coastal natural capital assets. Where there is the potential of a likely significant adverse effect, mitigation measures are proposed to ensure the effect is lowered to not a significant level. Consequently, the proposed development complies with the requirements of Biodiversity Policy 3.
Biodiversity Policy 4	Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements: • avoid • minimise or • mitigate significant disturbance to, or displacement of, highly mobile species	Yes	The assessments carried out in the preparation of the EIAR have included measures to avoid, minimise and mitigate against any potential adverse effects on highly mobile species. Evidence of this is included within the following chapters: • In the Fish and Shellfish Chapter; Sections 12.5 to 12.7 inclusive, the significance of effects associated with the temporary increase in SSC and sediment deposition, habitat damage and disturbance, mortality, injury, behavioural impacts and auditory masking arising from noise and vibration during construction, on fish and shellfish, are all assessed to be not significant. • In the Marine Mammals Chapter, the significance of effects associated with UXO clearance, pile driving, other construction activities, disturbance and collisions with vessels, prey availability and distribution and increased concentration of suspended solids are all assessed to be minor or negligible for all species, post mitigation. The mitigation to be used includes a VMP, EVMP and a MMMP. • In the Offshore Ornithology chapter, the significance of effects associated with disturbance and displacement from increased vessel activity, indirect effects on prey species, habitat loss, the accidental release of pollutants during construction, operation and decommissioning are all assessed to be not significant. During operation there is also collision risk of seabirds and migratory birds with offshore infrastructure in the array area and impacts arising from artificial light which are both assessed to be not significant. • In the Biodiversity Chapter, the significance of effects associated with mobile species is assessed in Sections 23.5 to Section 23.7. The assessment concluded that there would be short-term, significant and reversible effects on breeding birds which will be reversed as habitats are reinstated and compensatory planting is established at Blakes Cross North and the landfall site. Temporary, significant and reversible impacts to aquatic and fish species were assessed which will be reversed once watercourses are reinstated at dry working areas.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			However, positive, long-term effects are assessed during the operational phase of the proposed development due to the biodiversity enhancement planting incorporated within the design of the proposed development. • In the Offshore Bats chapter, the significance of effects associated with disturbance and displacement from noise, vessel activity and infrastructure, artificial lighting at night, changes to prey during construction, operation and decommissioning are all assessed to be not significant. During operation there is also potential impacts to migrating and foraging bat species from collision and barotrauma which is also assessed to be not significant with one exception, under the precautionary principle a likely significant effect cannot be ruled out for foraging bats from the potential bat population at Rockabill as further monitoring is required to determine if a roost exists on the island. For further information on the assessment undertaken in relation to offshore bats refer to Chapter 35. The embedded mitigation measures discussed in each chapter ensure compliance with Biodiversity Policy 4.
Protected Marine Sites			
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.	Yes	The Developer has prepared a Natura Impact Statement (NIS) which is included within the planning application, which assessed whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. No potential impacts were identified on the conservation objectives of any of the SACs and SPAs screened in to the assessment that may result in an adverse effect on the integrity of the European site following mitigation. This ensures compliance with Protected Marine Sites Policy 1. Please refer to the NIS document prepared for the proposed development for a full detailed analysis of each SAC and SPA.
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	Yes	The Developer has prepared a NIS to assess whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. The guidance used in the preparation of the NIS was as follows. • Appropriate Assessment Screening for Development Management-OPR Practice Note PN01 (Office of the Planning Regulator, 2021); • Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment Heritage and Local Government (DEHLG, 2009, revised 11/02/10); • Guidelines for Ecological Impact Assessment in the UK and Ireland. Chartered Institute of Ecology and Environmental Management (CIEEM 2018, updated 2022);

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			• Offshore Renewable Energy Development Plan II: Strategic Environmental Assessment Report. Department of Environment, Climate and Communications & Sustainable Energy Authority Ireland (DECC, 2023); • Offshore Renewable Energy Development Plan II: Principles Report. Department of Environment, Climate and Communications & Sustainable Energy Authority Ireland (DECC, 2022); • Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive - Guidance for Planning Authorities (DEHLG, 2010); Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 and PSSP 2/10 (DEHLG, 2010); • Guidance on EIS and NIS preparation for Offshore Renewable Energy Projects. Department of Communications, Climate Action and Environment (DCCAE, 2017); • Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission (EC 2021); • Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011); • Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC. European Commission (EC, 2007); • European Commission Managing Natura 2000 sites The provisions of Article 6 of the Habitats Directive 92/43/EEC, EC 2018; • Marine Natura Impact Statements in Irish Special Areas of Conservation: A working document. Prepared by National Parks and Wildlife Service. Department of Arts, Heritage and Gaeltacht (DAHG 2012); • Guidance to Manage the Risk to Marine Mammals from Manmade Sound Sources in Irish Waters. Prepared by National Parks and Wildlife Service. Department of Arts, Heritage and Gaeltacht (DAHG 2014); • Wind energy developments and Natura 2000. European Commission (EC, 2011); • The Guiding Principles for Cumulative Impact Assessments in Offshore Wind Farms, (Renewable UK, 2013) as presented in the Guidance on EIS and NIS Preparation for Offshore Renewable Energy Projects. Department of Communications, Climate Action and Environment (DCCAE, 2017); and • Interpretation line suggested by the Commission as regards the application of Directive 85/337/EEC to associated/ancillary works. The guidance used to inform the NIS ensures compliance with Protected Marine Sites Policy 2.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
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	Yes	The purpose of the proposed development is not to enhance the ability of any marine protected site to adapt to climate change. However, the proposed development is an offshore wind energy project which will significantly contribute to the Government's target of achieving 5GW of electricity generated by offshore wind by 2030. The renewable electricity generated will facilitate the long-term shift away from fossil fuel use and associated fossil fuel emissions. There will be a net beneficial impact on climate change which will have the indirect effect of enhancing the resilience of marine protected sites. This ensures compliance with Protected Marine Sites Policy 3.
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 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: • avoid • minimise or • mitigate significant impacts on features that may be required to develop and further establish the network or • if it is not possible to mitigate significant impacts, proposals should set out the reasons for proceeding	Yes	In the preparation of the EIAR and NIS, the features and qualifying interests of the protected marine sites, within the zone of influence of the proposed development, were identified. The likely significant effects on the features and qualifying interests of protected marine sites were assessed, in particular in the EIAR in the Physical Processes Chapter, the Benthic Ecology Chapter, the Fish and Shellfish Chapter, the Marine Mammals Chapter, the Offshore Ornithology Chapter and the Biodiversity Chapter. Mitigation measures were proposed, as required. The Developer prepared a NIS to assess whether the proposed development (either alone or in combination with other projects or plans) is likely to have an adverse effect on the integrity of a European site. No potential impacts were identified on the conservation objectives of any of the SACs and SPAs in the proposed development's zone of influence that may result in an adverse effect on the integrity of the European site following mitigation. This ensures compliance with Protected Marine Sites Policy 4.
Non-Indigenous Species			
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:	Yes	No marine invasive non-native species (MINNS) were identified during the site specific surveys. However, records of a number of non-native species exist from the benthic study area such as slipper limpet, *Crepidula fornicate*, wireweed *Sargassum multicum*, carpet sea squirt *Didenmum vexillum*, Japanese skeleton shrimp *Caprella mu*tica, leathery sea squirt *Styela clava* and the Pacific oyster *Magallana gigas*. A wide range of vessels will be engaged, particularly in the construction and decommissioning phases, of the proposed development. The vessels may come from

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	• moving equipment, boats or livestock (for example fish or shellfish) from one water body to another • 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		overseas and some will make numerous round trips to port, which will contribute to the risk of the introduction or spread of MINNS through ballast water discharge. The risk is addressed in the Benthic Ecology Chapter and the Offshore Environmental Management Plan (Appendix 6.1 of Volume 8). Non-native species management measures implemented during the construction, operation and decommissioning phases are in compliance with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (2004) and the International Convention for the Prevention of Pollution from Ships (MARPOL), thus ensuring that the risk of the potential introduction and spread of MINNS will be minimised. These measures are included in the offshore Environmental Management Plan (Appendix 6.1) and ensure compliance of the proposed development with Non-Indigenous Species Policy 1.
Water Quality			
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: • avoid • minimise or • mitigate significant adverse impacts	Yes	The proposed development will require seabed installations of export cables, inter-array cables, 35 to 49 WTGs and one OSP. The construction phase has the potential to introduce contaminants and increase suspended sediment in the water column, causing deterioration of the water quality of bathing waters, shellfish water protected areas (WPAs), waterbodies designated under the Water Framework Directive (WFD) and non-designated waterbodies. Potential impacts to water quality have been assessed in the Marine Water and Sediment Quality Chapter and the Water Chapter, with no significant adverse residual effects expected on relevant waterbodies (designated and non-designated) during construction, operation and decommissioning. Further information is also provided in the Offshore Water Framework Directive Compliance Report (Appendix 11.1 of Volume 9) and the Onshore Water Framework Directive Compliance Report (Appendix 22.2 of Volume 10). Habitats and species that are sensitive to a change in water quality are considered in the Benthic and Intertidal Ecology Chapter, Fish and Shellfish Chapter, Offshore Ornithology Chapter and Marine Mammals Chapter. Potential impacts have been identified (Sections 12.4 and 13.4, respectively) and assessment of the effect of these impacts is presented (Sections 12.7 and 13.7, respectively). Mitigation measures are presented in each chapter (Sections 12.6 and 13.6, respectively). These include an offshore environmental management plan (EMP) that specifies measures that will reduce the risk of harm to habitats and species including: • Marine pollution contingency measures to address the risks, methods and procedures to deal with any spills and collision incidents in relation to all activities carried out seaward of the high water mark (HWM)

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			• A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance • Non-native species measures to manage the risk of introduction and spread of invasive non-native species; and • Waste management arrangements Due to the assessed level of impact to water quality being not significant for all activities assessed and the commitment to implement the Offshore EMP to manage potential impacts to water quality, the proposed development is compliant with Water Quality Policy 1.
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.	No	Water Quality Policy 2 is not relevant to the proposed development as the project is not designed to improve water quality, nor enhance habitats and species.
Sea Floor and Water Column Integrity			
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: • avoid • minimise or • mitigate significant adverse impacts on marine habitats or • if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding	Yes	The proposed development will require seabed installation of export cables, inter-array cables, 35 to 49 WTGs and one OSP. The construction phase has the potential to introduce pollutants, chemicals and suspended sediment into the water column, causing deterioration of the water quality and consequent adverse impacts on marine habitats. The placement of temporary and permanent infrastructure on the seabed also has the potential to cause temporary and long-term habitat loss. The potential impacts from the construction, operation and decommissioning activities on marine habitats have been assessed in the Benthic and Intertidal Ecology Chapter and the Fish and Shellfish Chapter. The direct impacts to subtidal benthic habitats as a result of long-term habitat loss during construction, operation and decommissioning are assessed to be not significant. There will be no loss of intertidal habitat (due to the use of HDD under the intertidal zone to the exit pit in the subtidal zone) and minimal loss and disturbance of nearshore habitats at the exit pit location itself. The offshore EMP (Appendix 6.1) includes measures that will reduce the risk of harm to benthic and intertidal species and habitats including: • Marine pollution contingency measures in compliance with MARPOL to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM • A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			• Non-native species measures to manage the risk of introduction and spread of invasive non-native species and • Waste management arrangements Due to the assessed level of impact being not significant and the commitment to implement the offshore EMP, the proposed development is compliant with Sea Floor and Water Column Integrity policy 1.
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: • avoid • minimise or • mitigate adverse impacts on important habitats and species	Yes	The proposed development will require seabed installation of export cables, inter-array cables, up to 49 WTGs and one OSP. The construction phase has the potential to introduce pollutants, chemicals and suspended sediment into the water column, causing deterioration of water quality and consequent adverse impacts on important habitats and species. The placement of temporary and permanent infrastructure on the seabed also has the potential to cause temporary and long-term habitat loss. The potential impacts from the construction, operation and decommissioning activities on marine habitats have been assessed in the Benthic and Intertidal Ecology Chapter and the Fish and Shellfish Chapter. The likelihood of direct impacts to habitats is assessed to be not significant and there will be minimal loss and disturbance of inshore habitats. No ecologically significant adverse residual effects on benthic subtidal ecology receptors have therefore been predicted as a result of long-term habitat loss. The offshore EMP (Appendix 6.1) includes measures that will reduce the risk of harm to benthic and intertidal species and habitats including: • Marine pollution contingency measures in compliance with MARPOL to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM • A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance • Non-native species management measures to manage and prevent the risk of introduction and spread of MINNS and • Waste management arrangements Due to the assessed level of impact being below ‘significant adverse’ and the commitment to implement the offshore EMP, the proposed development is compliant with Sea Floor and Water Column Integrity policy 2.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
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	Yes	The installation of the export cables at the landfall has the potential to have an adverse impact through disturbance on coastal habitats, ecosystem functioning and ecosystem services at the coastline. At the landfall the export cables will be installed by horizontal directional drilling (HDD). The HDD entrance pit is situated landward of the HWM and the HDD exit pit is seaward of the low water mark, thereby effectively avoiding the entire intertidal zone. Therefore, the landfall activities will minimise the potential for impact on the coastal habitats and ecosystems. The impacts on subtidal and inter-tidal coastal habitats are assessed the Intertidal and Benthic Ecology Chapter and the residual effects are described in 12.5 to 12.7 and are assessed as not significant. The impacts on the coastal habitats above the HWM are assessed in the Biodiversity Chapter and the residual effects are described in Section 23.7. The conclusion of the assessments is that there will be no likely significant effects on the coastal habitats above the HWM. The offshore EMP (Appendix 6.1) and the onshore Construction Environmental Management Plan (CEMP) include measures that will reduce the risk of harm to coastal species and habitats including: • A marine pollution contingency plan to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM • A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance • A non-native species management plan detailing how the risk of introduction and spread of invasive non-native species will be minimised and • Waste management arrangements Due to the assessed level of impact being below ‘significant adverse’ and the commitment to implement the offshore EMP and onshore CEMP, the proposed development is compliant with Sea Floor and Water Column Integrity Policy 3.
Marine Litter			
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,	Yes	The proposed development will require numerous vessels in the construction, operation and decommissioning phases, which raises the risk of potentially introducing litter into the maritime area. To mitigate this risk the Developer is committed to implementing the marine pollution contingency measures which are laid out in full in in the offshore EMP (Appendix 6.1) to comply with MARPOL requirements. The Developer will manage waste as per the accepted waste hierarchy broadly defined as prevention, preparing for re-use, recycling, recovery, and disposal, in decreasing order of preference.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	in order of preference and in accordance with legal requirements: • avoid • minimise or • mitigate the litter Demonstration of these measures must provide satisfactory evidence that the proposal is able to manage all waste without creation of litter.		The offshore EMP provides a detailed explanation of the measures which ensures compliance with Marine Litter Policy 1.
Underwater Noise			
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: a. Appropriate Assessment (AA) b. Environmental Impact Assessment (EIA) c. Strategic Environmental Assessment (SEA) d. 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 e. Species protected under the Wildlife Acts	Yes	The proposed development will be constructed using a variety of underwater techniques and therefore is expected to create some level of underwater noise. Underwater noise modelling was undertaken as part of the preparation of the EIAR to assess the likely significant effects on marine fauna. The assessment presented in the Marine Mammals Chapter (supported by the Underwater Noise Assessment Technical Note (Appendix 14.1 of Volume 9)) considered the loudest noise and the greatest potential impact range, which was from pile driving monopile foundations surrounded by the deepest waters. Other noise sources were also considered, including cable laying, dredging, drilling, rock placement, trenching and the operation of the turbines. These noise sources were found to be significantly below that of impact piling. The noise of unexploded ordnance clearance was also considered. The assessment presented in the Marine Mammals Chapter determined that there will be no significant effects on marine fauna from underwater noise (Section 14.7). Consequently, a Noise Assessment Statement is not required. Underwater noise impacts have also been considered in the NIS where marine fauna species are identified as Qualifying Interests of protected marine sites. Proposed mitigation measures include the use of marine mammal observers and acoustic deterrent devices, and these are described in the MMMP (in Appendix 14.3 of Volume 9). Implementation of these measures ensures compliance with Underwater Noise Policy 1.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	• 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.		
Air Quality			
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.	Yes	The proposed development is an offshore wind energy project. As a significant source of renewable electricity, the proposed development will result in a reduction in the air pollution from fossil fuel electricity generation, both directly and cumulatively. The assessment presented in the Air Quality Chapter concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development. Therefore, the proposed development complies with Air Quality Policy 1.
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: a. avoid b. minimise or c. mitigate air pollution	Yes	As a significant source of renewable electricity, the proposed development will result in a reduction in air pollution from fossil fuel electricity generation. Whilst there will be a slight negative residual effect of increased air pollution associated with the construction phase of the proposed development, this is not considered significant in EIA terms. The assessment presented in the Air Quality Chapter concludes that there will be a positive, moderate and permanent residual effect on air quality in Ireland as a result of the proposed development. Therefore, the proposed development complies with Air Quality Policy 2 by providing a reduction in overall air pollution.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Climate Change			
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: • avoided • minimised • mitigated • 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.	Yes	The proposed development will be subject of a statutory environmental impact assessment. The potential impact of the construction and presence of the offshore infrastructure on the coastline has been assessed within the Marine Physical Processes Chapter of the EIAR. The assessment concluded that there will be no significant adverse effects (Section 10.7). In the preparation of the EIAR, no flood defence or carbon sequestration ecosystem service receptors were identified within assessment study areas. The coastal area in proximity to the proposed development boundary seaward of the HWM (hereafter referred to as the 'offshore development area') is relatively benign and sheltered in terms of wave and tidal effects which is conducive to the settlement of mainly fine sediments that dominate the local seabed. The presence of the WTG and OSP during the operational phase will cause slight reductions in wave heights which will dissipate to leeward (down-wind) of the array area. Modelling of wave processes toward the adjacent coastline showed that during large storm events there would be a slight reduction in the heights of waves which could reach the coastline. However, subsequent wave shoaling into shallow water will remain the dominant process on waves in the nearshore, so this modification to wave conditions is considered imperceptible, relative to baseline conditions, which is not significant. In addition, tidal blockage, which will occur in the form of local scale flow interactions around individual WTG and OSP foundations, will not extend any distance or occur at a scale that would interfere with any marine process receptors, therefore there would be no impact to the coastal area. Modelling of physical processes resulting from the proposed development demonstrated that there will be no adverse changes to physical features of the coast, ensuring compliance with Climate Change Policy 1.
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	Yes	The proposed development will be a significant source of renewable electricity over its 35-year life. The generation of greenhouse gas emissions due to the construction of the proposed development and the savings in greenhouse gas emissions during its operations are presented and assessed in Volume 5, Chapter 28: Climate. The assessment demonstrated that significant reductions in greenhouse gas emissions will arise due to the consumption of renewable electricity over the lifetime of the proposed development. Consequently, the proposed development complies with Climate Change Policy 2.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	• 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, if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.		
Economic – Thriving Maritime Economy			
Co-existence			
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: • minimise significant adverse impacts • mitigate significant adverse impacts or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding	Yes	The site of proposed development is in an area of relatively high marine usage and as such, poses a potential for high levels of potential adverse impacts. However, the developer is committed to implementing mitigation measures to significantly reduce theses impacts. The developer will create and ensure the contractor implements cable specification and installation measures, a Cable Risk Assessment (CBRA), a Vessel Management Plan (VMP) and a Fisheries Management and Mitigation Strategy (FMMS). In addition, advisory safety zones will be established, the details of the development will be published in Notice to Mariners and included on updated nautical charts. Adoption of the management plans listed above will reduce potential impacts on other marine activities to no higher than moderate (not significant). Please refer to the Commercial Fisheries Chapter, Volume 4, Chapter 17: Shipping and Navigation (hereafter referred to as the 'Shipping and Navigation Chapter'), Volume 4,

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			Chapter 20: Infrastructure and Other Users (hereafter referred to as the 'Infrastructure and Other Users Chapter'), and Volume 5, Chapter 33: Socio-Economic, Tourism and Recreation (hereafter referred to as the 'Socio-Economic, Tourism and Recreation Chapter') for further information on the co-existence of the proposed development with the relevant users of the marine environment. The project design and the implementation of the management plans ensure compliance with the Co-existence Policy 1.
Infrastructure			
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.	Yes	The construction of the offshore elements of the proposed development will create approximately 740 and 1,360 full time equivalent direct and indirect jobs respectively. Regionally this results in 416 direct jobs and 765 indirect jobs after factoring in leakage and displacement. It is anticipated that the operational phase will employ approximately 1,530 and 2,570 full time equivalent (FTE) direct and indirect jobs respectively. Regionally this results in 1,033 direct jobs and 1,735 indirect jobs after factoring in leakage and displacement. See the Socio-Economic, Tourism and Recreation Chapter for further information. The proposed development will indirectly facilitate the diversification or regeneration of marine industries, in compliance with Infrastructure Policy 1.
Social-Engagement with the Sea			
Access			
Access Policy 1	Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference: • avoid • minimise or • mitigate significant adverse impacts on public access	Yes	The proposed development has the potential to impact on tourism and recreation during the construction and operational phases. The offshore and onshore development areas overlap with areas used for tourism and recreation. Recreation is assessed in the Infrastructure and Other Users Chapter and in the Socio-Economic, Tourism and Recreation Chapter. These assessments include mitigation measures where necessary and conclude that there will be no significant adverse impacts on public access, tourism or recreation as a result of the proposed development. Therefore, the proposed development complies with Access Policy 1.
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	Yes	Though not a tourist development, it is anticipated that there will be opportunities for marine tourism which will allow tourists to visit the offshore development area. Recreation is assessed in the Infrastructure and Other Users Chapter and the Socio-Economic, Tourism and Recreation Chapter. Therefore, the proposed development indirectly complies with Access Policy 2.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	competent authority, and where they contribute to the policies and objectives of this NMPF.		
Employment			
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	Yes	The construction of the offshore elements of the proposed development will create direct employment opportunities for approximately 740 individuals and indirect opportunities for approximately 1360. Construction of the onshore infrastructure of the proposed development will create a further 250 full time equivalent jobs. Approximately 15 full time equivalent jobs, some of which will local and marine related, will be created to facilitate the operation of the proposed development. Further information on the need for the proposed development is presented in Volume 2, Chapter 4: The Need for the Proposed Development (hereafter referred to as the 'Need for the Proposed Development Chapter'). Socio-economic benefits of the proposed development are presented in the Socio-Economic, Tourism and Recreation Chapter. In addition, it is it is anticipated that there may be opportunities for marine tourism, thereby indirectly creating independent employment opportunities for local individuals from the Irish coastal communities. The proposed development will contribute to a net increase in marine employment. to comply with Employment Policy 1.
Heritage Assets			
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: • avoid • minimise or • mitigate harm to the significance of heritage assets and • if it is not possible, to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. (see definition of 'Public Benefits' in the Glossary)	Yes	The installation of cables and foundations for WTGs, the OSP and the onshore grid facility has the potential to cause direct disturbance and/or damage to undiscovered artefacts of marine archaeological significance and terrestrial cultural heritage features. An assessment of these potential impacts has been undertaken in Volume 3, Chapter 18: Offshore Archaeology and Cultural Heritage and Chapter 25: Onshore Archaeology, Architectural and Cultural Heritage from an offshore and onshore perspective, respectively. The assessments have determined that no significant effects on heritage assets are expected (Sections 18.7 and 25.7, respectively). The main mitigation for the protection of known marine archaeological receptors will be avoidance. This will be achieved via the implementation and monitoring of archaeological exclusion zones (AEZs), which are proposed for identified high value offshore archaeological and cultural heritage receptors. In such zone no works will be undertaken. All high value receptors with a potential for impact will have a minimum 100m AEZ. A Protocol for Archaeological Discoveries (PAD) will be implemented for the construction phase. The PAD is part of the Offshore EMP. The PAD is a system for reporting and investigating unexpected archaeological discoveries encountered during the different phases of the project, with a retained archaeologist providing guidance and advising the contractor on the implementation of the PAD. The PAD also makes

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			provision for the implementation of temporary exclusion zones around areas of possible archaeological interest, for prompt archaeological advice, and, if necessary, for archaeological inspection of important features prior to further activities in the vicinity. The PAD provides a mechanism to comply with legislation, including notification to the National Monuments Service. The Cultural Heritage Strategy (Appendix 25.4) provides appropriate identification, recording and relevant protection measures of cultural heritage assets in the onshore development area. The assessment of the potential effects on marine and onshore cultural heritage determined that there will not be any significant effect on heritage assets. The proposed development complies with the Heritage Assets Policy 1.
Rural Coastal and Island Communities			
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.	Yes	The proposed development will be situated off the coasts of Counties Dublin, Meath and Louth. Approximately 740 direct full time equivalent (FTE) and 1,360 indirect FTE jobs will be required for the construction phase. A further 1,530 direct and 2,570 indirect FTE jobs will be required for the operation and maintenance of the proposed development. The developer will establish a Community Benefit Fund once the proposed development is in construction. It is estimated that the funding will reach approximately €80 million, approximately €4 million per annum for 20 years. The fund is expected to allow the local coastal communities to develop new and existing initiatives in their own areas, support existing local amenities and clubs, develop environmental and energy efficiency schemes, as well as the fishing industry. Further information on the Operation and Maintenance Facility is provided in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Volume 5, Chapter 32: Population and Human Health and the Socio-Economic, Tourism and Recreation Chapter address the socio-economic effects of the proposed development, including the community benefit fund. The proposed development complies with the Rural Coastal and Island Communities Policy 1
Seascape and Landscape			
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	Yes	Multiple photomontages were prepared at various stages during the design process. These photomontages were published on the Developer's website (www.northirishseaarray.ie) and displayed during public consultation events. Further information on the public consultation and feedback received is presented in the Consultation Report (Appendix 1.2) of this EIAR.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	b) minimise or c) 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.		Photomontages were prepared and visualisation assessments were carried out. These are presented in Volume 5, Chapter 29: Seascape, Landscape and Visual (hereafter referred to as the 'Seascape, Landscape and Visual Chapter') and the appendices to the chapter. In the assessment, 55 representative viewpoints were selected and used to measure the magnitude of the impacts. The assessment concluded that the greatest significance of effect on the seascape and landscape of the area, and on visual amenity, will be major to moderate negative, which is not significant in EIA terms. The cumulative effect assessment carried out for the Seascape, Landscape and Visual Chapter concluded that though the Negligible or Low-negligible contribution of the proposed development to the overall cumulative effect from the southerly viewpoints (VP36 to VP47), it is acknowledged that a significant cumulative effect is generated at these viewpoints. Whilst a significant adverse cumulative effect was assessed from the southerly viewpoints (VP 36 to 47), it is noted that the proposed development is a critical development to enable Ireland to meet the legally binding renewable energy target of 5GW of offshore wind energy by 2030. The key objectives of the proposed development also include: • To deliver a fixed bottom offshore wind farm to contribute towards the Irish Governments target delivery of 5GW of offshore wind generation by 2030 and 80% of electricity to come from renewable sources by 2030 • To support the European carbon reduction targets of reducing emissions by 95% by the year 2050 to support the European Union in becoming carbon neutral • To support the reduction in demand for imported energy from a volatile fossil fuel import market by improving Ireland's domestic energy generation capabilities through the deployment of offshore wind • To deliver the proposed development in a safe, efficient and environmentally sustainable manner within the constraints of technical feasibility and economic viability • To deliver renewable electricity at low cost to the Irish consumer through the use of known, tried and tested technology (fixed foundation offshore wind) Further information outlining the reasons for the proposed development to proceed despite the significant cumulative impact is presented in Volume 2, Chapter 4: Need for the Proposed Development. Therefore, the proposed development complies with Seascape and Landscape Policy 1.
Social Benefits			

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
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: • minimise or • mitigate significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits	Yes	The developer will establish a Community Benefit Fund which will be put in place once the proposed development is in construction. It is estimated that the funding will reach approximately €80 million, approximately €4 million per annum for 20 years which will directly enhance social benefits in the region of the proposed development. Further information on the proposed development's compliance of Social Benefits Policy 1 are provided in the Socio-Economic, Tourism and Recreation Chapter. The proposed development and the Community Benefit Fund associated with it directly align with Social Benefits Policy 1.
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.	No	Social Benefits Policy 2 is not relevant to the proposed development as the project is not explicitly designed to increase the understanding and enjoyment of the marine environment.
Transboundary			
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.	Yes	Notifications of the application for permission for the proposed development have been sent to the Northern Ireland Department for Infrastructure Planning, the United Kingdom Department for Levelling Up, Housing and Communities, the Planning Directorate (Wales), Strategic Environmental Assessment Gateway (Scotland) and Isle of Man Department of Infrastructure. The proposed development is an offshore wind farm situated off the east coast of Ireland in the Irish Sea. Transboundary effects arising throughout the lifetime of the proposed development have been assessed in Volumes 3-5 of the EIAR. The assessments concluded that there will be no significant transboundary effects. Therefore, the proposed development complies with Transboundary Policy 1.
KEY SECTORAL/ACTIVITIY POLICIES			
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	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm and not a proposal for the sustainable development of aquaculture.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
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: • avoid • minimise • mitigate significant adverse impacts on aquaculture • If it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm with no aquaculture areas involved.
Aquaculture Policy 3	Land-based coastal infrastructure that is critical to and supports development of aquaculture should be supported, in accordance with any legal requirements and provided environmental safeguards contained within authorisation processes are fully met.	No	The aquaculture policies are not relevant to the proposed development as the project is for an offshore wind farm with no aquaculture areas involved.
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: • Safety of navigation and access to naval facilities • Firing, test or exercise areas • Communication, and surveillance systems • 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.	Yes	The proposed development is in proximity to the Gormanston Danger Area EID1, through which the offshore export cable corridor (ECC) passes. The closest radar equipped military airfield is Casement Aerodrome. An assessment of impacts on these receptors is presented in Volume 3, Chapter 19: Aviation and Radar and the Infrastructure and Other Users Chapter. Both the Irish Air Corps (IAC) and the Department of Defence (DoD) have been informed by the proposed development under the assumption that the WTGs will be detected on the Casement Primary Surveillance Radar (PSR). Consultation with the DoD will continue to ensure that construction, operation and decommissioning activities will not impact on activities within the Gormanston Danger Area EID1, the airspace of which used by the IAC as a firing range. The effect of the proposed development on the defence forces' military receptors is determined to be not significant. As the Developer and EIAR team have engaged with the DoD, the proposed development is in compliance with Defence and Security Policy 1.
Energy - Emerging Technologies (Carbon Capture and Storage, and Hydrogen)			

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
n/a	NMPF notes that specific marine planning policy development will be considered in the future	No	There are no known carbon capture and storage or hydrogen projects in the proposed development area.
Energy - Natural Gas Storage			
Natural Gas Storage Policy 1	Subject to assessments required for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), natural gas storage proposals should be supported.	No	Natural Gas Storage Policy 1 is not relevant to the proposed development as the project is for an offshore wind farm with natural gas storage component.
Energy – Offshore Renewable Energy (ORE)			
ORE Policy 1	Proposals that assist the State in meeting the Government's offshore renewable energy targets, 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.	Yes	The proposed development is an offshore wind energy project which will directly contribute to the Government's target of achieving 5GW of offshore wind-generated renewable electricity by 2030. The contribution of a renewable electricity source on the east coast of Ireland will facilitate the long-term shift away from fossil fuel use and will increase Ireland's energy security. The Need for the Proposed Development Chapter provides further information on how the proposed development will assist in meeting the Governments offshore renewable energy targets. Volumes 3 and 5 of the EIAR present a rigorous assessment of the impacts of the proposed development and the mitigation measures in relation to minimising impacts on the marine environment, marine ecology, and other maritime users. In conclusion, the proposed development is compliant with the objectives of the ORE Policy 1.
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.	Yes	Volume 2, Chapter 3: Legal and Policy Framework and the Need for the Proposed Development Chapter describe how the proposed development is consistent with national policy including the OREDP in assisting the Government in meeting offshore renewable energy targets. The OREDP identified assessment areas for offshore wind development in the Strategic Environmental Assessment. The proposed development is strategically positioned within Assessment Area 1) East Coast – North. The proposed development is deemed a Phase One Project under the Transition Protocol and therefore directly complies with ORE Policy 2.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	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).		
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: • avoid • minimise • mitigate adverse impacts or • 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.	No	ORE Policy 3 is not relevant to the proposed development as the project is an ORE proposal.
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.	Yes	The proposed development has been carefully assessed alongside all other proposed and potential construction activities in the local area and each has been considered with potential cumulative effects. The interaction of the proposed development and other activities of national importance is also assessed within the Commercial Fisheries Chapter, Shipping and Navigation Chapter, Aviation and Radar Chapter and the Infrastructure and Other Users Chapter. The assessment of the impacts of proposed development on proposed and consented activities is provided in Volume 6, Chapter 38: Cumulative and Inter-Related Effects.
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.	No	ORE Policy 5 is not relevant to the proposed development as the project is an ORE proposal that will not affect other ORE projects.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
ORE Policy 6	Proposals for infrastructure enabling local use of excess energy generated from emerging marine technologies (wave, tidal, floating wind) should be supported.	No	ORE Policy 6 is not relevant to the proposed development as the project is not for local infrastructure related to use of excess energy.
ORE Policy 7	Where potential for ports to contribute to ORE is identified, plans and policies related to this port must encourage development in such a way as to facilitate ORE and related supply chain activity.	Yes	The proposed development will require a construction port, where the components will be stored and, in some instances, assembled before being transferred to the offshore development area. A Construction Port Assessment was carried out during the preparation of the EIAR, which identified a number of suitable ports both on the island of Ireland and Great Britain. For the Operation and Maintenance Facility, the current option under consideration is the adaption and leasing of part of an existing port facility at Greenore in Ireland. Whilst the Operation and Maintenance Facility is subjected to a separate planning/permitting consents, it is included in the cumulative impact assessment of the EIAR in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Further information is provided in Volume 2, Chapter 6: Description of the Proposed Development – Offshore (hereafter referred to as the 'Offshore Description Chapter'). The proposed development complies with ORE Policy 7.
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.	Yes	Existing and potential future sub-sea cables were considered when defining the cable corridor and development boundary for the proposed development. A total of 6 cables and pipelines pass through the study area but none intersect the proposed development boundary. Please refer to Volume 2, Chapter 5: Consideration of Alternatives, Volume 2: Chapter 8: Construction Strategy – Offshore (hereafter referred to as the 'Offshore Construction Chapter'), Chapter 9: Construction Strategy – Onshore (hereafter referred to as the 'Onshore Construction Strategy'); the Infrastructure and Other Users Chapter, and Volume 4, Chapter 26: Material Assets (hereafter referred to as the 'Material Assets Chapter') for further information. Therefore, the proposed development adheres to the policy objectives inherent in ORE Policy 8.
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.	Yes	Visualisation assessments were carried out and are presented in the Seascape, Landscape and Visual Chapter in accordance with the following guidelines: • Landscape Institute and the Institute of Environmental Management and Assessment, Guidelines of Landscape and Visual Impact Assessment: Third Edition (2013)

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	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.		• Scottish Natural Heritage (SNH) (now known as NatureScot), Offshore Renewables – Guidance on assessing the impact on coastal landscape and seascape, Guidance for Scoping an Environmental Statement (SNH, 2012) • SNH (NatureScot), Visual Representation of Wind Farms Guidance (SNH, 2017a) • SNH (NatureScot), Siting and Designing Wind Farms in the Landscape (SNH, 2017b) • SNH (NatureScot), NatureScot (2021) Guidance - Assessing the cumulative landscape and visual impact of onshore wind energy developments (also identified as applicable to the cumulative effects of offshore wind energy developments) and • Department of the Environment, Heritage and Local Government (DEHLG), Wind Energy Development Guidelines (2006 / 2019) Draft Revised As part of the pre-application process, multiple photomontages were prepared at various stages during the design process. These photomontages were published on the Developer's website (www.northirishseaarray.ie) and displayed during public consultation events. Further information on the public consultation and feedback received is presented in the Consultation Report (Appendix 1.2) of this EIAR. Therefore, the proposed development adheres to the policy objectives inherent in ORE Policy 9.
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.	No	The proposed project is not a land use plan or policy. ORE Policy 10 is not relevant.
ORE Policy 11	Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.	Yes	The flexibility provided by the DF Opinion will enable the proposed development to avail of emerging renewable energy technologies and associated supply chains.
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: • avoiding, or • minimising, or	No	The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	• mitigating adverse impacts. • If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.		
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: • avoid, or • minimise, or • mitigate potential adverse impacts on those activities. • If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	No	The Petroleum Policies are not relevant to the proposed development as the project is not on or near any site where petroleum activities or infrastructure exist.
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.	No	Transmission Policy 1 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission project.
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	No	Transmission Policy 2 is not relevant to the proposed development as the proposed development will not be in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	or consenting process for energy transmission proposals should demonstrate that they will, in order of preference: • avoid • minimise • mitigate adverse impacts, or • if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding		energy transmission proposals. See the Infrastructure and Other Users Chapter for more details on offshore infrastructure in the vicinity of the proposed development.
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.	No	Transmission Policy 3 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission development.
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.	No	Transmission Policy 4 is not relevant to the proposed development as it is an ORE development which does not include any facilitation of energy transmission projects.
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	Yes	The array area of the proposed development is situated approximately 0.5km from Interconnector 2 Scotland to Ireland (IC2) with the nearest WTG located approximately 750m from IC2. The interaction with the construction phase of the proposed development and IC2 is assessed in the Infrastructure and Other Users Chapter. Due to the distance from IC2 to the array area, the assessment concluded that there are no significant effects arising from the construction of the proposed development. The onshore cable will cross IC2 twice and Interconnector 1 (IC1) once. The views of Gas Networks Ireland in relation to how such activities could impact the pipelines will be taken into account. The pipeline crossing works will be undertaken in accordance with the Gas Networks Ireland GNI Safety Advice for Working in the Vicinity of Gas Pipelines (2016). A Gas Networks Ireland (GNI) inspector will be present for the duration of the pipeline crossing works to ensure adherence to the Gas Networks Ireland procedures. Gas Networks Ireland has been consulted in relation to the proximity of the proposed development and IC2 and IC1 and the proposed crossing of the onshore assets. Therefore, the proposed development aligns with Transmission Policy 5.

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	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.		
Transmission Policy 6	Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation of fracked gas, additional proposals for natural gas transmission/ import infrastructure should be supported.	No	Transmission Policy 6 is not relevant to the proposed development as the proposed development is an ORE project and not a transmission project.
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: • avoid, • minimise, or • mitigate such impacts. • 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.	Yes	The impacts of the proposed development on the access for existing commercial fisheries activities was assessed. Please refer to the Commercial Fisheries Chapter for a full impact assessment on the predicted impacts on the commercial fishing industry. The fisheries activities included in the assessment are Irish and UK demersal otter trawlers, Irish potting vessels, Irish razor clam, mussel and scallop dredgers, UK scallop dredgers, Irish and Belgian beam trawlers, and Irish pelagic trawlers and demersal seine fisheries. Upon implementation of the Fisheries Management and Mitigation Strategy (FMMS) (developed in consultation with the fishing industry), all residual effects are expected to be not significant (Section 16.7). This ensures compliance with Fisheries Policy 1.
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 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	Yes	A FMMS will be prepared in consultation with the local fishing interests. (refer to Volume 9, Appendix 16.2) Upon implementation of the FMMS all residual significant effects on fishing activities are not expected to be significant (Section 16.7). This ensures compliance of the proposed development with Fisheries Policy 3.

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	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 the 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.		

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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.	No	Fisheries Policy 3 is not relevant to the proposed development as the project is not designed to enhance fishery sustainability.
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.	No	Fisheries Policy 4 is not relevant to the proposed development as the project is not designed to enhance access to fishing activities.
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 essential fish habitat, they must demonstrate that they will, in order of preference: • avoid, • minimise, • mitigate significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes. • If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.	Yes	The proposed development will not enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. The impact of the proposed development on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes has been assessed in the Benthic and Intertidal Ecology and Fish and Shellfish Ecology chapters. The assessments determined that residual effects of the proposed development on benthic and intertidal habitats and species and fish and shellfish species would not be significant. This ensures compliance with Fisheries Policy 5.
Fisheries Policy 6	Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to discuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.	No	Fisheries Policy 6 is not relevant to the proposed development as the project is not a port or harbour development.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Mineral Exploration and Mining			
Mineral Exploration and Mining Policy 1	Only proposals which are in line with national policy on mineral exploration and mining should be considered, provided they fully meet the environmental safeguards contained within the mineral exploration and mining consent processes.	No	The Mineral Exploration and Mining policy is not relevant to the proposed development as the project contains no mining or mineral exploration aspects.
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	Yes	Impacts of the proposed development on navigation, ports and anchorages are assessed in Section 17.5 of the Shipping and Navigation Chapter. The assessment included a Navigational Risk Assessment (NRA) (Appendix 17.1 of Volume 9). Mitigation and monitoring measures relevant to shipping and navigation during the construction phase will include: • advisory safety zones; • advisory safe passing distances; • buoyed construction area; • compliance with relevant regulator guidance; • guard vessel(s) as required; • liaison with Irish Coast Guard in relation to search and rescue (SAR) resources; • lighting and marking; • marine coordination for project vessels; • marking on nautical charts; • project vessel compliance with international marine regulations; and • promulgation of information. The Shipping and Navigation Chapter assessed potential impacts on vessel displacement, collision risk, reduced access during construction, operation and decommissioning and additionally allision risk, reduction in under keel clearance, anchor interaction and emergency response capabilities during operation. The resulting residual effect was either tolerable with mitigation or broadly acceptable, which are not significant in EIA terms. Therefore, the proposed development complies with Ports, Harbours and Shipping Policy 1.
Ports, Harbours and Shipping Policy 2	Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference: • avoid	Yes	Impacts associated with safety of port operations and access are assessed in Section 17.5 of the Shipping and Navigation Chapter. The significance of the effect from the impact of the proposed development during construction, operation and decommissioning on current port activity (i.e. access to local

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	• minimise or • mitigate significant adverse impacts and • if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding		ports) is determined to be broadly acceptable and As Low As Reasonably Practicable (ALARP), which is not significant in EIA terms. Therefore, the proposed development complies with Ports, Harbour and Shipping Policy 2.
Ports, Harbours and Shipping Policy 3	Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate consideration of the National Ports Policy, the National Planning Framework, and relevant provisions related to the TEN-T network.	Yes	An Operation and Maintenance Facility will be required for the proposed development. The current option under consideration is the adaption and leasing of part of an existing port facility at Greenore in Ireland. Whilst the Operation and Maintenance Facility is subjected to a separate planning/permitting consents, it is included in the cumulative impact assessment of the EIAR in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. Further information is provided in the Offshore Description Chapter. The modification and use of Greenore port would be in compliance with Ports, Harbours and Shipping Policy 3.
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.	Yes	Key stakeholders were consulted and feedback from consultation is included within Section 4 of the Navigation Risk Assessment. The consultees included the Department of Transport, Marine Survey Office, Commissioners of Irish Lights and the Irish Coast Guard, and Dublin Port Company and Drogheda Port Company as local ports. The Navigation Risk Assessment also includes analysis of vessel traffic in the area based on multiple data sources. Therefore, the proposed development aligns with Ports, Harbours and Shipping Policy 4.
Ports, Harbours and Shipping Policy 5	Proposals for capital dredging will be supported where it is necessary to safeguard national port capacity and Ireland's international connectivity, and where required compliance assessments associated with authorisations have been carried out and incorporated into subsequent competent authority decision(s).	No	Ports, Harbours and Shipping Policy 5 is not relevant to the proposed development as the project is not a dredging proposal.
Ports, Harbours and Shipping Policy 6	In areas of authorised dredging activity, including those subject to navigational dredging, proposals for	No	Ports, Harbours and Shipping Policy 6 is not relevant to the proposed development as the project is not situated in areas of authorised dredging activity.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	other activities will not be supported unless they are compatible with the dredging activity.		
Ports, Harbours and Shipping Policy 7	Proposals for maintenance dredging activity will be supported where: • relevant decisions by competent authorities incorporate the outcome of statutory environmental assessment processes, as well as necessary compliance assessments associated with authorisations, including in relation to the planning process • there will be no significant adverse impact on marine activities or uses or the maritime area. Any potential adverse impact will be, in order of preference, avoided, minimised or mitigated • dredged waste is managed in accordance with internationally agreed hierarchy of waste management options for sea disposal • if disposing of dredged material at sea, existing registered disposal sites are used, in preference to new disposal sites and • where they contribute to the policies and objectives of this NMPF	No	Ports, Harbours and Shipping Policy 7 is not relevant to the proposed development as the project is not a proposal for maintenance dredging.
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" • minimise • mitigate or • if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding	No	Ports, Harbours and Shipping Policy 8 is not relevant to the proposed development as the project is not situated in a licensed disposal area.
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).	Yes	The sea-bed preparation required for WTG foundation installation may require localised dredging and management of drill cuttings. The management of all wastes arising from the proposed development have been assessed against the waste hierarchy as described in the Resource and Waste Chapter. The assessment concluded that there are not significant impacts arising from the management of dredged material within the proposed development boundary. Therefore,

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
			the proposed development aligns with the objectives of Ports, Harbours and Shipping Policy 9.
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	No	Ports, Harbours and Shipping Policy 10 is not relevant to the proposed development as it does not identify new dredge disposal sites.
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.	Yes	Impacts to commercial and recreational vessels are assessed in Section 17.5 of the Shipping and Navigation Chapter, including in relation to changes in navigable sea room and WTG blade air gap, with no significant effects identified. Measures to minimise the navigational risk between commercial vessels arising from an increase in the density of vessels in the maritime space as a result of the wind farm are presented in the Shipping and Navigation Chapter and the Navigational Risk Assessment (Appendix 17.1) of the EIAR. For mitigation measures specifically, please refer to Section 17.6. Measures to minimise the navigational risk arising between recreational and commercial vessels by redirecting recreational vessels are included in the Shipping and Navigation Chapter and the Infrastructure and Other Users Chapter of the EIAR. With the implementation of measures included within the EIAR, it is concluded the proposed development does not pose a significant navigational risk. In conclusion, the proposed development is compliant with the objectives of the Safety at Sea Policy 1
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: • avoid • minimise • mitigate adverse impacts or	Yes	For the proposed development, inter-array and export cables will have target burial depth of 1m – 3m. Seabed burial will be the primary means of cable burial and the burial depth plus any external cable protection will be determined by the CBRA. There is a higher risk of an under-keel clearance effect with the export cables when compared to the inter-array cables. This is due both to the export cables being in shallower water and increased crossing traffic volumes. Baseline surveys indicated that vessel traffic in transit through the ECC was low and the majority of vessels cross the ECC perpendicularly thus minimising the overall exposure

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	• if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding		to any underwater allision risk. This will be managed through the CBRA process. See the Shipping and Navigation Chapter for further information. The probability of an underwater allision occurrence has been assessed to be extremely unlikely or negligible (in respect to inter-array cables) and the reduction in under-keel clearance is considered broadly acceptable, which is not significant in EIA terms. Therefore, the proposed development complies with Safety at Sea Policy 2.
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.	Yes	As per Section 17.6 of the Shipping and Navigation Chapter, lighting and marking of the array will comply with the requirements of with the Commissioners for Irish Lights and with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. Further information is provided in the Lighting and Marking Plan (LMP) included in Appendix 17.1 of Volume 9. Therefore, the proposed development complies with the objectives of Safety at Sea Policy 3.
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.	Yes	As per Section 17.6 of the Shipping and Navigation Chapter, lighting and marking of the array will comply with the requirements of the Commissioners for Irish Lights and with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. Further information is provided in the Lighting and Marking Plan (LMP) included in Appendix 17.1 of Volume 9. Therefore, the proposed development complies with the objectives of Safety at Sea Policy 3.
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: • avoid • minimise • mitigate adverse impacts or • 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	Yes	Potential impacts to SAR have been assessed within Section 17.5 of the Shipping and Navigation Chapter, and have been determined to be tolerable with mitigation and ALARP, which is not significant in EIA terms. The Developer is committed to working within the parameters of MGN 654, including ID marking as well as lighting and marking in liaison with the IRCG, to minimise impacts. The most likely consequences in the event of a SAR operation is that SAR assets are able to fulfil their objectives without any limitations on capability. As part of the scenario deemed to have the greatest likely significant effect, it may not be possible to undertake an effective search. However, given compliance with MGN 654 for the layout, this is considered highly unlikely. Overall, relevant embedded mitigation measures are compliant with relevant regulator guidance, liaison with IRCG in relation to SAR resources, lighting and marking, marine coordination for proposed development vessels, proposed development vessel compliance with international marine regulations and WTG design/layout. Therefore, the proposed development aligns with Safety at Sea Policy 5.
Sport and Recreation			

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
Sport and Recreation Policy 1	Proposals that promote sustainable development of water-based sports and marine recreation, while enhancing community health, wellbeing and quality of life, should be supported, provided that due consideration is given to environmental carrying capacities and tourism pressures.	No	Sport and Recreation Policy 1 is not relevant to the proposed development as the proposal is not designed to promote development of water-based sports and marine recreation.
Sport 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	Yes	The site of proposed development is in an area of relatively high marine usage. However, there are no sailing clubs, marinas, wind, kite or wave surf clubs within the study area. Recreational facilities have been assessed in the Infrastructure and Other Users Chapter. No potential likely significant effects have been identified on marine recreational users. The developer proposes to create and ensure implementation by the contractor of a Vessel Management Plan (VMP) which includes navigational safety measures and promulgation of information will further ensure impacts and risks are managed to an acceptable level. Additionally, advisory safety zones and details of the development may be published in Notice to Mariners (where deemed appropriate). Please refer to the Infrastructure and Other Users Chapter and the Socio-Economic, Tourism and Recreation Chapter for further detail. The design of the proposed development and further mitigations plans ensure compliance with the Sports and Recreation Policy 2.
Sport and Recreation Policy 3	Opportunities to promote inclusive development of water-based sports and marine recreation should be supported, where appropriate and at the applicable scale, with a focus on facilities for people with disabilities.	No	Sport and Recreation Policy 3 is not relevant to the proposed development as the proposal is not designed to promote inclusive development of water-based sports and marine recreation.
Sport and Recreation Policy 4	Proposals that improve access to marine and coastal resources for tourism activities, and sport and recreation should be supported, where appropriate, at the applicable scale and aligned with existing development plans.	No	Sport and Recreation Policy 4 is not relevant to the proposed development as the proposal is not designed to increase access to marine and coastal resources for sports and marine recreation.
Sport 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 consideration for planners and due consideration should be given to best practice guidance for marine	Yes	Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established. Advisory safety zones of 50m will be sought for incomplete structures where construction activity may be temporarily paused (and therefore the 500m safety zone has lapsed) such as installed foundations or where construction works are completed but the WTGs have not yet been commissioned in compliance with MGN 645. Further information on the design and implementation of water safety protocols for the proposed development is presented in the Offshore Description Chapter, the Offshore Construction Chapter, the Shipping and Navigation Chapter, the Navigational Risk

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	and coastal recreation areas endorsed by the Visitor Safety in the Countryside Group.		Assessment (Appendix 17.1 of Volume 9) and the Lighting and Marking Plan (Appendix 17.4 of Volume 9). The design and implementation of safety protocols ensure the compliance of the proposed development with Sport and Recreation Policy 5.
Telecommunications			
Telecommunications Policy 1	Proposals that guarantee existing and future international telecommunications connectivity which is critically important to support the future needs of society, Government, the provision of Public Services and enterprise in Ireland, should be supported.	No	Telecommunications Policy 1 is not relevant to the proposed development as the proposal is not designed to explicitly guarantee existing and future international telecommunications connectivity due to its main objective being the transmission of power.
Telecommunications Policy 2	Preference should be given to proposals where evidence is provided of an integrated approach to development and activity, such as the bundling of cables (electricity and communications) where suitable, as well as pipelines for multiple activities, to minimise impacts on the marine environment, infrastructures and other users. Compatibility should be achieved, in order of preference, through: • avoiding or • minimising or • mitigating adverse impacts, or • If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding	Yes	There are no proposed third party cables which could be bundled with the proposed development's cables. Known and potentially future sub-sea cable assets and onshore cable assets within the proposed development area have been identified. A total of 6 cables and pipelines that cross the study area but none come within the proposed development boundary. Please refer to the Offshore Construction Chapter, the Onshore Construction Strategy; the Infrastructure and Other Users Chapter and the Material Assets Chapter. Cable installation methodology, as well as the burial depth and any requirement for protection measures, will be defined by a detailed CBRA. The export and inter-array cables are likely to be buried. The burial depth will ensure that the cable is adequately protected against scour and damage from activities such as potential laying of other cables in the future. The proposed development will be compliance with the NMPF Telecommunications Policy 2
Telecommunications Policy 3	Preference should be given to proposals that protect submarine cables whilst achieving successful seabed user coexistence, such as the bundling of cables (electricity and communications) as well as pipelines for multiple activities where suitable. Proposals should specify if separate access to cables for the purposes of repair and maintenance is required. With regard to decommissioning redundant submarine cables, a risk-based approach should be applied with consideration given to cables being left in situ where this would minimise significant impacts on the	Yes	A total of 6 cables and pipelines transect the study area, but none are the proposed development boundary. Therefore, the proposed development aligns with Telecommunications Policy 3. Please refer to the Offshore Construction Chapter, the Onshore Construction Strategy, the Infrastructure and Other Users Chapter, and the Material Assets Chapter.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	physical, natural, societal, historic, and economic value of the area.		
Telecommunications Policy 4	Proposals that ensure and enhance connectivity of Ireland's rural and island communities to high quality telecommunications networks should be supported.	No	Telecommunications Policy 4 is not relevant to the proposed development as the proposal is not related to telecommunication connectivity.
Tourism			
Tourism Policy 1	Where appropriate, proposals enabling, promoting, or facilitating sustainable tourism and recreation activities, particularly where this creates diversification or additional utilisation of related facilities beyond typical usage patterns, should be supported.	No	Tourism Policy 1 is not relevant to the proposed development as the proposal is not designed to promote or facilitate sustainable tourism and recreation activities.
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.	Yes	The effects of the proposed development on tourism resulting from the construction, operation and decommissioning of the proposed development have been assessed in the Socio-Economic, Tourism and Recreation Chapter. The assessment concluded that there were no significant pre-mitigation effects on tourism arising from the proposed development. Therefore, the proposed development aligns with Tourism Policy 2.
Tourism Policy 3	Proposals for tourism development should seek to optimise facilities and use of space by taking a cross-sectoral development approach that provides for multiple activities, whilst minimising the extent to which the proposal is likely to adversely impact on the natural environment.	No	Tourism Policy 3 is not relevant to the proposed development as the proposal is not designed to develop tourism.
Wastewater Treatment and Disposal			
Wastewater Treatment and Disposal Policy 1	Proposals by Irish Water related to the treatment and disposal of wastewater that: • service the social and economic development of the country under the National Planning Framework • resolve environmental issues at priority areas identified by the EPA • contribute to the realisation of the objectives of: a. Ireland's River Basin Management Plan 2018 – 2021 b. The Water Services Policy Statement 2018 – 2025	No	Wastewater Treatment and Disposal Policy 1 is not relevant to the proposed development as the proposal is not from Irish Water.

Policy Name	Policy Description	Relevant to Proposed Development?	Consistency of the proposed development with objectives of the NMPF
	c. Marine Strategy Framework Directive 2012 - 2020 should be supported, provided they fully meet the environmental safeguards contained within relevant authorisation processes.		
Wastewater Treatment and Disposal Policy 2	Proposals that have the potential to significantly adversely affect existing and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for by Irish Water should not be authorised unless: • compatibility with the existing, authorised, proposed or otherwise identified in consultations with Irish Water activity, can be satisfactorily demonstrated; • the proposal is clearly of strategic or national importance. Where possible, proposals that may affect Irish Water activities or plans should engage with Irish Water at the earliest available opportunity. Compatibility should be achieved, in order of preference, through: • avoiding adverse impacts on those activities; and / or • minimising impacts where they cannot be avoided; and / or • mitigating impacts where they cannot be minimised.	No	Wastewater Treatment and Disposal Policy 1 is not relevant to the proposed development as the proposal has no impact on wastewater management or treatment.

2. Conclusion

This report provides an assessment of the consistency of the proposed development with the policies and objectives of the NMPF.

The assessment concluded that through all phases, with the implementation of the mitigation measures proposed, the proposed development will further the objectives and policies of the NMPF with respect to Offshore Renewable Energy and will not adversely affect the attainment of the objectives and policies for the other key sectors.

In relation to the overarching biodiversity policies of the NMPF, avoidance, minimisation or embedded mitigation has been incorporated in the design of the proposed development, and further mitigation measures will be implemented as required, to reduce adverse effects on biodiversity receptors. With one exception, such effects are not expected to be significant. The one exception is a conclusion in respect of offshore bats that, r, under the precautionary principle, during the operational phase a likely significant effect cannot be ruled out for foraging bats from the potential bat population at Rockabill, as further monitoring is required to determine if a roost exists on the island. The underlying assessment to this conclusion is comprehensively outlined in Volume 5, Chapter 35: Offshore Bats.

In addition, in relation to SLVIA, the EIAR concluded that the project will not have any significant negative impact by itself but when considered cumulatively with the southernly viewpoints (VP 36-47), a significant cumulative negative impact could not be ruled out.

No other significant impacts were identified in the carrying out of the EIAR in respect of the proposed development, either alone or when considered cumulatively with other projects.

Other than the potential impact in relation to offshore bats highlighted above, the proposed development, which is of critical importance to the delivering of Ireland’s climate goals, will not adversely affect the attainment of the overarching policies of the NMPF.